Council meeting agenda

Metro
600 NE Grand Ave.
Portland, OR 97232-2736

Thursday, September 26, 2024 **10:30 AM** **Metro Regional Center, Council chamber, https://zoom.us/j/615079992 (Webinar ID: 615079992) or 888-475-4499 (toll free)**

This meeting will be held electronically and in person at the Metro Regional Center Council Chamber.
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https://zoom.us/j/615079992 (Webinar ID: 615 079 992)

1. Call to Order and Roll Call

2. Public Communication

Public comment may be submitted in writing. It will also be heard in person and by electronic communication (video conference or telephone). Written comments should be submitted electronically by emailing legislativecoordinator@oregonmetro.gov. Written comments received by 4:00 p.m. the day before the meeting will be provided to the council prior to the meeting.

Those wishing to testify orally are encouraged to sign up in advance by either: (a) contacting the legislative coordinator by phone at 503-813-7591 and providing your name and the agenda item on which you wish to testify; or (b) registering by email by sending your name and the agenda item on which you wish to testify to legislativecoordinator@oregonmetro.gov. Those wishing to testify in person should fill out a blue card found in the back of the Council Chamber. Those requesting to comment virtually during the meeting can do so by using the "Raise Hand" feature in Zoom or emailing the legislative coordinator at legislativecoordinator@oregonmetro.gov. Individuals will have three minutes to testify unless otherwise stated at the meeting.

3. Presentations

3.1 National Day of Remembrance for Indian Boarding School Survivors — 24-6124

Attachments: Attachment 1

4. Consent Agenda

4.1 Resolution No. 24-5427, For the Purpose of Confirming the Reappointment of Chris Oxley to the Metropolitan Exposition Recreation Commission — RES 24-5427

Attachments: Resolution 24-5427
Staff Report

5. Resolutions

5.1 Resolution No. 24-5431 For the Purpose of Accepting the Oregon Zoo 2024 Campus Plan — RES 24-5431

Presenter(s): Heidi Rahn, Zoo Director, Metro
Utpal Passi, Zoo Deputy Director, Metro
Kristin Solomon, Senior Capital Project Manager, Metro

Attachments: Resolution no. 24-5431
Staff Report
Exhibit A

6. Public Hearing for 2024 Urban Growth Management: Chief Operating Officer Recommendations

6.1 2024 Urban Growth Management: Public Hearing on Chief Operating Officer Recommendations — 24-6123

Presenter(s): Marissa Madrigal, COO, Metro
Eryn Kehe, Urban Policy and Development Manager, Metro
Ted Reid, Principal Regional Planner, Metro

Attachments: Staff report
Attachment 1
Attachment 2
Attachment 3

7. Chief Operating Officer Communication

8. Councilor Communication

9. Adjourn

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ការគោរពសិទ្ធិពលរដ្ឋរបស់ ។ សំរាប់ព័ត៌មានអំពីកម្មវិធីសិទ្ធិពលរដ្ឋរបស់ Metro ឬដើម្បីទទួលពាក្យបណ្តឹងរើសអើងសូមចូលទស្សនាគេហទំព័រ www.oregonmetro.gov/civilrights។
បើលោកអ្នកត្រូវការអ្នកបកប្រែកាសនៅពេលអង្គប្រជុំសាធារណៈ សូមទូរស័ព្ទមកលេខ 503-797-1700 (ម៉ោង 8 ព្រឹកដល់ម៉ោង 5 ល្ងាច ថ្ងៃធ្វើការ) ប្រាំពីរថ្ងៃថ្ងៃធ្វើការ មុនថ្ងៃប្រជុំដើម្បីអាចឲ្យគេសម្រួលតាមសំណើរបស់លោកអ្នក ។

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January 2021

3.1 National Day of Remembrance for Indian Boarding School Survivors
Presentation

Metro Council Meeting
Thursday, September 26, 2024

Federal Indian Boarding School Initiative Investigative Report Vol. II

July 2024

Assistant Secretary for Indian Affairs
Bryan Newland

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United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

July 17, 2024

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
Washington, D.C. 20240

Dear Madam Secretary:

On December 28, 1890, the U.S. military entered Third Mesa of Hopi and took 104 children from their families so they could be sent to the Keams Canyon Boarding School. Four years later, on November 25, 1894, two U.S. cavalry companies with rapid-fire artillery guns arrived again at Third Mesa to arrest 19 Hopi leaders as prisoners of war after they refused to send additional Hopi children to the school: Heevi'ima, Polingyawma, Masatiwa, Qotsventiwa, Piphongva, Lomahongewma, Lomayestiwa, Yukiwma, Tuvehoyiwma, Patupha, Qotsyawma, Sikyakeptiwa, Talagayniwa, Talasyawma, Nasingayniwa, Lomayawma, Tawalestiwa, Aqawsi, and Qoiwiso.

The U.S. Government sent those leaders to Alcatraz Island, a former U.S. military installation, where they were held captive until September 1895 — isolated next to the frigid waters of San Francisco Bay more than 1,000 miles from their families, their Tribe, and their Hopi homelands.

More than a century later, on June 22, 2023, I visited Alcatraz Island to learn about the important role it played in our nation's relationship with Indigenous Peoples. During my visit, I looked down into the underground military prison cell where the United States held those 19 Hopi government and religious leaders for refusing to send Hopi children to boarding school.

As I stood there, I imagined their lives, their hopes for the children in their villages, and their experience with the U.S. Government. I also reflected on our work together to tell the truth about our nation's history of operating Federal Indian boarding schools. I thought of the hundreds of people we have met in communities across the country, who came to share their experiences, and their relatives' experiences, at Federal Indian boarding schools – many, for the first time.

For the first time in the history of the country, the U.S. Government is accounting for its role in operating Indian boarding schools to forcibly assimilate Indian children, and working to set us on a path to heal from the wounds inflicted by those schools.

You launched the Federal Indian Boarding School Initiative in June 2021 which, among other things, called for the Department of the Interior (Department), to produce the first official U.S. Government investigation into the Federal Indian boarding school system.

The Department released the first volume of its Investigative Report on Federal Indian boarding schools on May 11, 2022. That report included the first official list of Federal Indian boarding schools across the United States. It explained the policy justification for establishing those institutions, the conditions children experienced at those schools, and the intergenerational impacts

those schools had on Indigenous Peoples throughout the United States. That first volume also indicated that the Department would complete a second written report to more fully explain the cost, scope, and nature of the Federal Indian boarding school system.

Accordingly, I am submitting to you Volume II of the Federal Indian Boarding School Initiative Investigative Report. This second volume adds to our understanding of the Federal Indian boarding school system by:

- Updating the official list of Federal Indian boarding schools to include 417 institutions across 37 states or then-territories;
- Providing detailed profiles of each Federal Indian boarding school;
- Identifying 1,025 other institutions that did not satisfy the four criteria used for this investigation, but were nevertheless used to advance similar assimilation and education policy goals;
- Confirming that at least 973 American Indian, Alaska Native, and Native Hawaiian children died while attending Federal Indian boarding schools;
- Confirming that there are at least 74 marked and unmarked burial sites at 65 different school sites;
- Listing 127 different Treaties between the United States and Indian Tribes that implicate the Federal Indian boarding school system; and,
- Reporting that the Department estimates that the U.S. Government made appropriations available of more than $23.3 billion in FY23 inflation-adjusted dollars between 1871 and 1969 for the Federal Indian boarding school system as well as other similar institutions and associated assimilation policies.

In the process of publishing these two volumes, the Department's staff and contractors reviewed approximately 103 million pages of U.S. Government records. We also participated in listening sessions with hundreds of Indian boarding school survivors at 12 locations across the United States. The reflections and words of some of those individuals are included in this volume. We have also met with government officials and Indigenous leaders in some of our peer nations to understand their process of healing from the legacy of similar assimilationist boarding schools and institutions.

We have witnessed a change in our nation's understanding of these schools in a short period of time. Survivors and leaders have begun efforts to explain the legacy and impacts of Indian boarding schools on local communities across Indian country. Universities and other institutions have begun their own actions to redress for their role in the Federal Indian boarding school system. Popular books, television shows, and films have discussed these institutions, and humanized this history for wide audiences. Courts and members of Congress have engaged in a dialogue on the policies and laws advanced by this system.

It is important to acknowledge the work of the U.S. Government team members and contractors who carried out the research for this Initiative. They reviewed heart-wrenching documents, listened to survivors, and got to know the people affected by Federal Indian boarding schools. Their work was heavy, and it took a toll on them. Nevertheless, they remained dedicated to completing this work to bring truth and healing to people and communities across our nation who have been seeking it for generations. I will forever be grateful for their commitment, effort, and sacrifice.

Madam Secretary, it is my hope that this report does not mark the end of the U.S. Government's work to acknowledge, understand, and heal from the impacts of these boarding schools. Instead, our shared work should mark the beginning of a long effort to heal our nation – after all, these schools were used to pursue a policy of forced assimilation over a century and a half. Our work has occurred over just three years.

This volume includes eight additional recommendations that chart a road to healing. We recommend that our nation develop concrete actions to fulfill these recommendations, as some of our peer countries have done in similar circumstances. These actions should be rooted in what we have learned and set forth in this report, as well as in consultation with Indian Tribes and the people impacted by these schools. Our research and reporting can aid a national truth and healing commission, academic researchers, Tribal leaders, members of Congress, and policymakers in seeking a more detailed understanding of the present-day impacts of these institutions, and in developing specific remedies.

The most important thing is that our work to tell the truth about the Federal Indian boarding school system be paired with action.

As we have learned over the past three years, these institutions are not just part of our past. Their legacy reaches us today, and is reflected in the wounds people continue to experience in communities across the United States. We should honor the spirit of the Hopi leaders imprisoned at Alcatraz, as well as the people from across Indian country who have shared their families' stories with us, by working to heal those wounds.

I want to thank you, Secretary Haaland, for your leadership and courage in speaking the truth about our past, and the imperative to heal from it.

Sincerely,



Bryan Newland
Assistant Secretary – Indian Affairs



[1]

[1] Hopi prisoners of the U.S. Government sent to Alcatraz Island for "seditious conduct" [Photograph]. (1895). National Park Service (attributing photograph to Mennonite Library and Archives, Bethel College, North Newton, Kansas).

The Federal government had darker designs. By the late 1870s, its goals turned toward destroying tribal identity and assimilating Indians into broader society. Achieving those goals, officials reasoned, required the 'complete isolation of the Indian child from his savage antecedents.'

And because 'the warm reciprocal affection existing between parents and children' was 'among the strongest characteristics of the Indian nature,' officials set out to eliminate it by dissolving Indian families.

– *Haaland v. Brackeen*, 599 U.S. 255, 298 (2023) (Gorsuch, J., concurring) (internal citations omitted).



[2]

★ ★ ★ ★ ★ ★

1. Federal Indian Boarding School Initiative

On June 22, 2021, Secretary of the Interior, Deb Haaland, announced the Federal Indian Boarding School Initiative, a comprehensive effort to recognize the troubled legacy of Federal Indian boarding school policies with the goal of addressing their intergenerational impact and to shed light on the traumas of the past.

The Federal Indian Boarding School Initiative would have many facets, but the immediate direction was that the Department undertake the first U.S. Government investigation of the loss of human life and lasting consequences of the Federal Indian boarding school system. For nearly two centuries, the U.S. Government was responsible for operating or overseeing Indian boarding schools across the United States and its territories. Secretary Haaland determined that the Department was therefore uniquely positioned to assist in the effort to recover the histories of these institutions.

As described in Volume I, the United States has unique treaty and trust responsibilities to Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community, including to protect Indian treaty rights and land and other assets. To support these political and legal obligations, the Department protects and stores critical archival

[2] Indian children from the Sheldon Jackson School [Photograph]. (between ca. 1900 and ca. 1930). Library of Congress Prints and Photographs Division Washington, D.C.

records and other information relating to Indian Affairs. Important goals of the Federal Indian Boarding School Initiative include:

- Identifying Federal Indian boarding school facilities and sites;
- Identifying names and Tribal identities of Indian children who were placed in Federal Indian boarding schools;
- Identifying locations of marked and unmarked burial sites of remains of Indian children located at or near school facilities; and
- Incorporating viewpoints, including those of descendants, on the experiences in, and impacts of, the Federal Indian boarding school system.

 [3]

The Department completed the Federal Indian Boarding School Initiative Investigative Report Volume I within the scope of its existing U.S. Government appropriations, which limited the scope of the Department's ability to carry out some of

[3] Choate, J. N. (1870-1879). *Group of Four Students at the Carlisle Indian School* [Photograph]. Photo ID: PO#19, Collection: Potamkin, Cumberland County Historical Society.

the research needed for this investigation. The COVID-19 pandemic and resulting closures of U.S. Government facilities also warranted a continuation of the investigation.

Congress subsequently invested $7 million per fiscal year in dedicated support for the Federal Indian Boarding School Initiative, totaling $21 million as of January 1, 2024.

As part of the Federal Indian Boarding School Initiative and in response to recommendations from Assistant Secretary Newland in Vol. I, Secretary Haaland launched The Road to Healing. This tour across the country provided survivors of the Federal Indian boarding school system the opportunity to share their experiences, help connect communities with trauma-informed support, and facilitate collection of an oral history. This volume includes anonymized statements from speakers at these sessions to highlight the perspective of those who were directly affected by Federal Indian boarding schools.

This report identifies potential policy and investment opportunities that will help to inform priorities and the Federal budget development process, but it is not a budget document and does not imply approval of any specific action or investment. All activities and recommendations included in this report are subject to resource constraints and weighing of priorities as part of the annual budget formulation process, as well as the availability of appropriations provided by Congress.



[4]

[4] Photograph No. 519137; "Students in cadet uniforms in front of the buildings, Indian training school, Forest Grove, Oregon," 1882; Photographs of Indians, Indian Agencies, and Schools, 1876-1896; Records of the Bureau of Indian Affairs, Record Group 75; National Archives at College Park, College Park, MD.

2. Executive Summary

"Conditions within Indian schools, particularly boarding schools, have done a great deal to bring about the causes of problem drinking and very little to prevent them."

– Kennedy Report, U.S. Senate, 1969.[5]

 [6]

For this volume, the Department analyzed additional U.S. Government records to update the official list of Federal Indian boarding schools. Congress appropriated funding to support the Department's efforts to compile information for the second volume of the Federal Indian Boarding School Initiative, and the National Endowment for the Humanities provided additional funding to support this work. The National Native American Boarding School Healing Coalition, through a Memorandum of Understanding with the Department, was instrumental in the sharing of information and records pertinent to the U.S. Government's development of the list.[7]

[5] Committee on Labor and Public Welfare, Indian Education: A National Tragedy – A National Challenge, S. Rep. No. 91-501 at 19 (1969) [hereinafter Kennedy Report].
[6] Choate, J. N. (1879). Portrait of Group of Children [Photograph]. Scope and Contents: "Frank Cushing, Taylor Ealy, Mary Ealy, and Jenny Hammacker, All in School Uniform," Photo lot 81-12, John N. Choate photographs of Carlisle Indian School, National Anthropological Archives, Smithsonian Institution.
[7] Memorandum of Understanding Between the U.S. Department of the Interior and National Native American Boarding School Healing Coalition, Dec 7, 2021.

For Vol. I and Vol. II, the Department reviewed and considered all documents submitted to it regarding the Federal Indian Boarding School Initiative by American Indian, Alaska Native, and Native Hawaiian individuals, Indian Tribes, Alaska Native Villages, the Native Hawaiian Community, Indigenous organizations, and religious institutions and organizations.

The Department found that between 1819 and 1969, the Federal Indian boarding school system consisted of 417 Federal schools across 37 states or then-territories, including 22 schools in Alaska and 7 schools in Hawai‘i. Some individual Federal Indian boarding schools comprised multiple sites. The 417 Federal Indian boarding schools accordingly comprised 451 specific sites. The list of the names and locations of these schools are included in this report at **Appendix A**. New profiles for each school are provided in **Appendix B**. School Sites by State are listed in **Appendix C**. Maps of each current state showing the schools are provided in **Appendix D**.

For a school to qualify as a Federal Indian boarding school, for the purpose of the U.S. Government investigation, the institution must meet four criteria, that the institution: (1) provided on-site housing or overnight lodging; (2) was described in records as providing formal academic or vocational training and instruction; (3) was described in records as receiving U.S. Government funds or other support; and (4) was operational before 1969. This is the definition of "Federal Indian boarding school" used in this report.

The Department examined U.S. Government records, and using this investigation's definition of a "Federal Indian boarding school," the number of schools increased from 408 (reported in Volume 1) to 417. The updates fall into one of five categories:

Net Effect of List Changes

Recategorization of Federal Indian boarding schools from Volume I to Volume II	Federal Indian Boarding School Initiative Report Volume II
Category 1: Schools that were identified as Other Institutions in Volume I of Federal Indian Boarding School Initiative (BSI) reporting, but additional research/documentation for Volume II now meet all four criteria for official Federal Indian boarding school classification.	**+6 schools** 1. St. Pius X Mission Home; Skagway, Alaska 2. Dwight Mission School; Oklahoma 3. Wills Town Mission School; Fort Payne, Alabama 4. Flathead Agency Boarding and Day School; Old Agency, Montana 5. New Hope Academy; Fort Coffee, Oklahoma 6. St. Francis Regis Mission School; Ward, Washington
Category 2: New schools that were not previously identified in Volume I of BSI reporting, but with the documentation located during Volume II research, meet	**+5 schools** 1. Choctaw and Chickasaw Sanatorium School; Talihina, Oklahoma

all four criteria for Federal Indian boarding school classification.	2. Methvin Institute; Anadarko, Oklahoma 3. Lone Wolf Boarding School; Lone Wolf, Oklahoma 4. Washita Boarding School; Washita, Oklahoma 5. Stickney Home Mission School for Indians; Washington
Category 3: Merging of Federal Indian boarding schools – two schools that were identified during Volume I reporting that were determined during Volume II research to be the same school.	**-1 school** 1. St. Rose/St. Francis Xavier School and Holy Child Academy; Avoca, Minnesota
Category 4: Separating Federal Indian boarding schools – two sites that have a significant enough change to be considered their own Federal Indian boarding school. If a school changed any two of the three data elements of location, name, or operator, they are considered a new Federal Indian boarding school.	**+1 school** 1. Forest Grove Indian Training School separated from Chemawa Indian Training School; Oregon
Category 5: Federal Indian boarding school in Volume I of BSI reporting that upon further research was determined to be an Other Institution.	**-2 schools** 1. Shawnee Boarding School: was related to the Absentee Shawnee Boarding School. BSI researchers also updated the school's name on the "Other Institutions" list to Shawnee Mission Quaker School, as additional research shows it was an Indian day school; Shawnee, OK 2. Puyallup Indian School: Additional research shows it was an Indian day school. When the school moved to the Puyallup reservation and was eventually renamed Cushman Indian School, it did have a boarding component. Cushman Indian School is a separate school on the "Federal Indian Boarding School" list; Squaxin Island, Washington.

The Department acknowledges that some institutions classified as Federal Indian boarding schools continue to operate but without historical assimilationist intention or practices, including boarding schools now operated or funded by the Bureau of Indian Education. Instead, the Bureau of Indian Education is critical to providing high-quality educational opportunities from early childhood through life, accounting for the mental, physical, religious, and cultural aspects of learners from Indian Country.

And as described in Vol. I, so "her own people"[8] could once again thrive, Princess Bernice Pauahi Bishop, the last direct descendant of King Kamehameha I, in 1883 left her estate in "trust for a school dedicated to the education and upbringing of Native Hawaiians" on the Hawaiian monarchy's ancestral lands.[9] Kamehameha Schools are critical to

[8] Doe v. Kamehameha Schools/Bernice Pauahi Bishop Estate, 470 F.3d 827, 831 (9th Cir. 2006) (en banc) (citing Charles R. Bishop, The Purpose of the Schools, at 3 (1889)).
[9] Id.

providing quality education opportunities from early childhood through life, accounting for the mental, physical, religious, and cultural aspects of learners from the Native Hawaiian Community.

A graph of overall Capacity, Enrollment, and Attendance for the Federal Indian boarding school system is provided in **Appendix E**.

The Department is also releasing a List of Other Institutions based on available U.S. Government records. There were 1,025 of these institutions, listed in **Appendix F**, that did not meet the four criteria used for this investigation that may have involved education of Indian people, mainly Indian children. The List of Other Institutions includes Indian boarding schools operated by religious institutions and organizations that did not receive U.S. Government support.

The Department was able to identify, by name, 18,624 Indian children who entered the Federal Indian boarding school system. This number does not represent a comprehensive list of all children who attended Federal Indian boarding schools, but rather reflects the number of students the Department was able to identify since the beginning of this Initiative. This number does not include children who: attended a Federal Indian boarding school outside the period 1819-1969, may be listed as an attendee on records not available to the Department including those of religious institutions and organizations, or may be listed as an attendee of an Other Institution including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support. Recognizing that some records are no longer available, the Department notes that there may be missing information for certain Indian children who attended a school in the Federal Indian boarding school system. The Department acknowledges that the actual number of children who entered Indian boarding schools is greater.

After removal and confinement from their Indian Tribes and families to Indian boarding schools, many children did not return home. Based on available records, the Department concludes at least 973 documented Indian child deaths occurred across the Federal Indian boarding school system between 1819 and 1969. For this investigation, an identified deceased student means "any student enrolled at a Federal Indian Boarding School who may have died during a period of enrollment at a school between 1819 and 1969." This information is not complete and does not count children who died and who: attended a Federal Indian boarding school outside the period 1819-1969, may be listed as an attendee on records not available to the Department including those of religious institutions and organizations, or may be listed as an attendee of an Other Institution including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that

received no U.S. Government support. The Department acknowledges that the actual number of children who died while in Indian boarding schools is greater.

Appendix G provides a list of Tribal identities. Data collected represents the Tribal identities identified at Federal Indian boarding schools. The number of Federal Indian boarding schools is unique to each line of data. Individual Tribal identities will not add up to totals as schools can contain multiple Tribal identities. **Appendix H** provides a Graph of Deceased Indian Children by Year. **Appendix I** provides a List of Deceased Indian Children by Indian Tribe.

The Department's continued investigation has now identified 74 marked or unmarked burial sites at 65 different schools across the Federal Indian boarding school system based on available records. The composition of the approximate numbers of identified burial sites to date is as follows:

- Marked burial sites – 53
- Unmarked burial sites – 21

This information is not complete and does not include burial sites that may be: associated with Federal Indian boarding schools operational outside the period 1819-1969, listed on records not available to the Department including those of religious institutions and organizations, or associated with Other Institutions including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support. The Department acknowledges that the actual number of burial sites associated with Indian boarding schools is likely far greater.

The Department will not make public the specific locations of burial sites associated with the Federal Indian boarding school system, in order to protect against well-documented grave-robbing, vandalism, and other disturbances to Indian burial sites.[10]

The Department is working with Indian Tribes that wish to repatriate or protect in place any human remains or funerary objects from historical Indian boarding school sites that are currently located on U.S. Government lands consistent with specific Tribal practices, as applicable, and under the Native American Graves Protection and Repatriation Act (NAGPRA) and Archaeological Resources Protection Act (ARPA) processes. This may include the decision to keep the human remains or funerary objects in the current location but to maintain or change the headstone or to enhance protection of the burial site.

The Department supports the Office of Army Cemeteries (OAC), United States Army, collaborating with Indian Tribes, Alaska Native Villages, and descendants regarding human child remains buried at the Carlisle Barracks Main Post Cemetery

[10] *See, e.g.*, 43 C.F.R. §§ 7.18, 10.3 (2023).

consistent with specific Tribal practices for disinterment, continued safeguarding of child remains at the cemetery, or headstone modification.

Under the U.S. Constitution, treaties are part of the "supreme law of the land." The U.S. Government ratified approximately 374 treaties with Indian Tribes. The Department identified and lists in this volume 127 Indian Treaties that explicitly include Federal Indian boarding schools or general Indian education provisions, provided in **Appendix J**.

Appendix K provides a List of Federal Indian Policies associated with the Federal Indian boarding school system. The Department acknowledges that this list is not comprehensive.

The United States laid the groundwork for a general and publicly supported Indian education system when Congress enacted the Civilization Fund Act in 1819.[11] The purpose of the Act was "providing against the further decline and final extinction of the Indian tribes, adjoining the frontier settlements of the United States, and for introducing among them the habits and arts of civilization."[12] To carry the Act's provisions into effect, Congress appropriated an annual sum of $10,000 and further required an annual report of the proceedings adopted to execute the Act.[13] The funds annually appropriated under the Act were often apportioned to various religious institutions and organizations until Congress discontinued providing the annual appropriation in 1873.[14] This volume includes estimates of U.S. Government appropriations enacted to support assimilationist policies through the Federal Indian boarding school system, similar institutions, and related programs.

[11] Act of March 3, 1819, Ch. 85, 3 Stat. 516, codified at 25 U.S.C. § 271 (2020).
[12] Act of March 3, 1819, Ch. 85, 3 Stat. 516.
[13] Act of March 3, 1819, Ch. 85, 3 Stat. 516.
[14] Act of Feb. 14, 1873, c. 138, 17 Stat. 437, 461.

In this report, the Department estimates that the U.S. Government made appropriations available of more than $23.3 billion in FY23 inflation-adjusted dollars between 1871 and 1969 for the Federal Indian boarding school system as well as other similar institutions and associated assimilation policies.

Due to time and resource constraints, we did not research actual amounts spent on Federal Indian boarding schools and similar institutions. Further research on actual expenditures would help to further illuminate the extent of U.S. Government resources committed to this policy.

In some instances, Congress made lump-sum appropriations that included multiple categories of appropriations. In these cases, it is not possible to quantify how much of a general appropriation is attributable to Federal Indian boarding schools, other similar institutions, and related assimilation policies or programs. So as not to exclude relevant appropriations, the Department has included the full amount of these lump-sum appropriations in the overall estimate. Further details on the appropriations included in the Department's estimate are available in section 11 and **Appendix M** of this report.

Acknowledging these limitations and the uncertainty inherent in any estimate of U.S. Government appropriations for the purposes of this report, this report relies on $23.3 billion as the estimated U.S. Government appropriations available for the Federal Indian boarding school system, as well as other similar institutions and associated assimilation policies.

This amount excludes the following: Treaty-stipulated support, religious institution and organization support, U.S. military support, state support, wealth generated by Indian or Native Hawaiian children while in the system including for the agriculture and railroad industries, Indian domestic and other labor for non-Indian families and communities through the Outing System, and expenditures by non-federal entities.

Further, the Department did not analyze appropriations beyond the Federal Indian boarding school system. That is, a separate financial analysis is needed for appropriations associated with Federal Indian boarding schools operational outside the period 1871-1969 or associated with Other Institutions including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support in order to create a complete picture of the resources that supported these policies.

The total amount appropriated by year is based on available U.S. Government records and information**.**

The U.S. Government and Department maintained relationships with religious institutions and organizations for the Federal Indian boarding school system. Indian reservations "were distributed among the major religious denominations, which, in an unprecedented delegation of power by the U.S. Government to church bodies, were given the right to nominate new agents, and direct educational and other activities on the reservations."[15] U.S. Government records indicate that, in addition to the U.S. Army assigning officers to duty as superintendents of Indian affairs and Indian agents under the direction of the Indian Office, the Executive Branch accepted official recommendations by religious institutions and organizations for presidential appointed posts in states and territories.[16]

The Department has described the public-private relationship as follows:

> [T]he [Indian] agencies were, so to speak, apportioned among the prominent denominational associations of the country, or the missionary societies representing such denominational views; … to make nominations to the position of agent … and in and through this extra-official relationship to assume charge of the intellectual and moral education of the Indians thus brought within the reach of their influence.[17]

The U.S. Senate has confirmed, that the U.S. "military was frequently called in to reinforce the missionaries' orders."[18]

The Department concludes that at least 59 religious institutions and organizations received U.S. Government support to operate or support schools in the Federal Indian boarding school system. Accordingly, 210 of 417 Federal Indian boarding schools were operated by a religious institution or organization. This number does not include Indian boarding schools operated by religious institutions and organizations that did not receive U.S. Government support. This volume lists the religious institutions and organizations that the U.S. Government provided support to, available in **Appendix L**.

Given U.S. Government and religious institution and organization operation for nearly two centuries, "children of the first attendees of [Federal Indian] boarding schools

[15] Committee on Labor and Public Welfare, Indian Education: A National Tragedy – A National Challenge, S. Rep. No. 91-501 at 147 (1969) (citing ALVIN M. JOSEPHY, JR., THE INDIAN HERITAGE AMERICA, 339 (1968)) [hereinafter Kennedy Report].
[16] Annual Report to the Secretary of the Interior (1872), at 72, Commissioner of Indian Affairs, [hereinafter ARCIA for [year]].
[17] ARCIA for 1872, at 72.
[18] Kennedy Report, at 147.

went on to attend, as did their grandchildren, and great grandchildren leading to an intergenerational pattern of cultural and familial disruption."[19]

 [20]

As U.S. policy of Indian assimilation over time disfavored use of the Federal Indian boarding school system, the U.S. Government supported a new system: the removal of Indian children from their families for non-essential state foster care and adoption by non-Indian families. In 1978, the U.S. determined that the "wholesale separation of Indian children from their families is perhaps the most tragic and destructive aspect of American Indian life today."[21] Congress responded by enacting the Indian Child Welfare Act of 1978 (ICWA).[22] The enactment of ICWA marked the United States' official repudiation of forced assimilation through child removal as national Indian policy. On June 15, 2023, in a 7-2 decision, the U.S. Supreme Court upheld the 45-year-old U.S. Government law in *Haaland v. Brackeen* against constitutional challenge, with an opinion authored by Justice Barrett.[23]

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[19] Ursula Running Bear et al., The Impact of Individual and Parental American Indian Boarding School Attendance on Chronic Physical Health of Northern Plains Tribes, 42 Fam. Community Health 1 (2019).
[20] Photograph No. 0143; "T.B. skin Tests for students at the Intermountain School," ca. 1960; Records of the Indian Health Service, Record Group 513; National Archives at College Park, College Park, MD.
[21] U.S. House of Representatives, Committee on Interior and Insular Affairs, Establishing Standards for the Placement of Indian Children in Foster or Adoptive Homes, to Prevent the Breakup of Indian Families, H.R. REP. NO. 95-1386, 9 (1978); Margaret D. Jacobs, A Generation Removed: The Fostering and Adoption of Indigenous Children in the Postwar World 143-46 (2014).
[22] Indian Child Welfare Act of 1978, P.L. 95-608, Nov. 8,1978; 25 U.S.C. §§ 1901-1963.
[23] Haaland v. Brackeen, 599 U.S. 255 (2023).

During oral arguments, Justices Alito, Sotomayor, and Gorsuch addressed, mentioned, or responded to historical Federal Indian boarding school system points in questioning.[24] Justice Gorsuch cited the Federal Indian Boarding School Initiative Investigative Report Vol. I in his concurrence.

Detailed further below, the U.S. established and supported the precedent for Indigenous child removal as part of formal relations with Indigenous Peoples, which Canada, Australia, and New Zealand replicated in their formal relations with Indigenous Peoples. Canada, Australia, New Zealand, and the United States (CANZUS states) derive from the British Empire and maintain English common law systems. The four countries are distinct because they have political and legal relationships with Indigenous Peoples based on founding national documents, centuries-old judicial decisions, and legislative and executive actions and instruments—unlike other countries that base official interactions with Indigenous Peoples on human rights, or non-binding principles.

This volume references the official actions of Canada, Australia, and New Zealand to redress First Nations, Inuits, Métis, Aboriginal and Torres Strait Islanders, and Māori Tribes for state removal of Indigenous children to enter boarding schools and contemporary redress. It also describes the laws that Canada, Australia, and New Zealand enacted after the U.S. enacted ICWA to prevent official and widescale removal of Indigenous children through state and private adoption practices.

The List of Information Resources, in **Appendix N**, provides a collection of sources of information related to the Federal Indian boarding school system.

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[24] Haaland v. Brackeen, Docket Number 21-376, Transcript (2022).
[25] Photograph No. 290019486; "Students at a Train Station"; Photographs of Navajo Life in the Southwestern Region of the United States, 1936-1956; Records of the Bureau of Indian Affairs, Record Group 75; National Archives at College Park, College Park, MD.

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3. Recommendations of the Assistant Secretary for Indian Affairs

The Department's investigative findings based on available U.S. Government records detail the U.S. Government role in the Federal Indian boarding school system and subsequent outcomes. The United States has an obligation to correct and heal the wrongs wrought by the Federal Indian boarding school system because those wrongs continue to harm Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community. Based on the political and legal status and rights of Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community flowing from the Constitution, treaties, Supreme Court jurisprudence, statutes, and executive actions, Assistant Secretary for Indian Affairs Newland provides **eight** recommendations as part of Volume II for meaningful actions that the U.S. Government may undertake to correct and heal those wrongs.

1. **Acknowledge, Apologize, Repudiate, and Affirm.** The U.S. Government should issue a formal acknowledgment of its role in adopting a national policy of forced assimilation of Indian children, and carrying out this policy through the removal and confinement of Indian children from their families and Indian Tribes and the Native Hawaiian Community and placement in the Federal Indian boarding school system. Such an acknowledgment should include a recognition that the United States operated or supported public-private partnerships with religious institutions and organizations to carry out its policy; that many Indian children suffered physical, sexual, and emotional abuse at these institutions, and that many Indian children died; and that these harms continue to impact American Indian and Alaska Native individuals and Indian Country. The United States should accompany this acknowledgment with a formal apology to the individuals, families, and Indian Tribes that were harmed by U.S. policy. In addition, the United States could formally repudiate forced assimilation of American Indian, Alaska Native, and Native Hawaiian people as a national policy, and affirm that it is the policy of the United States to ensure that American Indian, Alaska Native, and Native Hawaiian people have the right to maintain their unique cultural identities and languages. Such a statement should be issued through appropriate means and officials to demonstrate that it is made on behalf of the people of the United States and be accompanied by bold and actionable policies.

2. **Invest in Remedies to the Present-Day Impacts of the Federal Indian Boarding School System.** The United States could invest in healing Indian Tribes, the Native Hawaiian Community, and American Indian, Alaska Native, and Native Hawaiian individuals from the legacy impacts of forced assimilation on a scale that is, at a minimum, commensurate with the investments made in the Federal Indian boarding school system between 1871 and 1969. This investment should be in addition to

annual appropriations to fund agency programs to fulfill the U.S. Government's trust and treaty obligations, and consistent with the full scope of its authority to act on behalf of Indians under various articles and clauses of the Constitution. The funding should be designed to remedy the present-day harms caused by historical Federal Indian boarding schools and policies of forced assimilation. These investments should also be designed to reach American Indian, Alaska Native, and Native Hawaiian individuals in urban communities. Funding to remedy the harms flowing from assimilationist policies and institutions should consider that Federal Indian boarding schools received funding and investments above and beyond annual appropriations from Congress.

Consideration for this investment should be applied to all of these recommendations, and include **five** interdependent areas of focus:

a. ***Individual and Community Healing.*** Provide funding and support for culturally based, community-driven healing efforts in Indian Country, urban Indian communities, and the Native Hawaiian Community. This support should be aimed at addressing the effects of Adverse Childhood Experiences (ACEs), traumatic stress, and intergenerational trauma. In distributing these funds, U.S. Government agencies should be flexible when it comes to access and use of the funds, including allowing tribal governments and other organizations to coordinate and consolidate funds from a range of federal programs to provide services. The U.S. Government should, support holistic and innovative approaches, including those rooted in connections to homelands and culture, and make these funds available to Indian Tribes, as well as organizations based in American Indian, Alaska Native, and Native Hawaiian communities, including in urban areas. It is also important to develop infrastructure to support this work, including facilities to provide specialized patient services for the treatment of historical and intergenerational trauma caused by the Federal Indian boarding school system and other institutions.

b. ***Family Preservation and Reunification.*** The U.S. Government should continue efforts to preserve, protect, and reunify American Indian and Alaska Native families. This funding would enable Indian Tribes to provide prevention and intervention services based in culture and tradition to families in need. The U.S. Government should support Tribal government agencies and courts in their actions to exercise jurisdiction over Indian child welfare cases, including ensuring that Tribal governments can directly administer child welfare programs, and to support the reunification of families. In addition, the U.S. Government should develop a national strategy for Native children and families, with a defined goal of measurably reducing the number

of American Indian, Alaska Native, and Native Hawaiian children in foster care, and supporting Tribes' long-term goals to preserve families and communities though self-determination and self-governance.

c. ***Violence Prevention.*** The United States has trust obligations to protect Indian Tribes, the Native Hawaiian Community, and American Indian, Alaska Native, and Native Hawaiian individuals.[26] Having safe communities and safe family home environments are crucial for positive life outcomes. The U.S. Government should place a priority on prevention and healing from historical and current violence across Indian Country.

Indian Tribes are hampered in their efforts to engage in violence prevention by patchwork jurisdiction over public safety within their borders that limits Tribal governmental powers, as well as the lack of funding to carry out this important work. With some exceptions, Indian Tribes have lacked the ability to exercise criminal jurisdiction over non-Indians on their lands.

There have been several recent reports commissioned by the U.S. Government to examine and combat violence in Indian Country, and many of the recommendations included in those reports have not yet been fulfilled.[27] The U.S. Government should implement many of those recommendations and continue to work to strengthen the ability of Tribes to exercise jurisdiction to directly prevent, investigate, and prosecute violent crimes within Indian country, including violent crimes committed by non-Indians on Indian lands.[28] The U.S. Government should also invest in violence prevention programs for Indian Tribes, the Native Hawaiian Community, and urban Indian communities; and, invest in tribal justice systems and victim services.

In addition to carrying out recommendations made in federally commissioned reports, the U.S. Government should develop a strategy to

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[26] Cf. U.S. v. Jicarilla Apache Nation, 564 U.S. 162, 175 (2011) (describing "that the Government 'has a real and direct interest' in the guardianship it exercises over the Indian tribes; 'the interest is one which is vested in it as a sovereign.' United States v. Minnesota, 270 U.S. 181, 194 (1926). This is especially so because the Government has often structured the trust relationship to pursue its own policy goals. Thus, while trust administration 'relat[es] to the welfare of the Indians, the maintenance of the limitations which Congress has prescribed as a part of its plan of distribution is distinctly an interest of the United States.' Heckman v. United States, 224 U. S. 413, 437 (1912)"); Oglala Sioux Tribe v. U.S., 674 F.Supp.3d 635 (2023).

[27] *See, e.g.,* The Attorney General's Advisory Committee on American Indian/Alaska Native Children Exposed to Violence: Ending Violence So Children Can Thrive; The Way Forward Report of the Alyce Spotted Bear & Walter Soboleff Commission on Native Children; The Final Report to The President | Activities and Accomplishments of Operation Lady Justice; The Not One More: the Not Invisible Act Commission Final Report.

[28] *See, e.g.*, 2013 and 2022 Reauthorizations of the Violence Against Women Act, recognizing the inherent authority of participating Tribes to exercise special domestic violence criminal jurisdiction over certain defendants, regardless of their Indian or non-Indian status, who commit certain covered crimes in Indian country; Tribal Law and Order Act.

measurably reduce the occurrence of Adverse Childhood Experiences (ACEs) for American Indian, Alaska Native, and Native Hawaiian children. In making these investments, the Federal Government should also ensure that Indian Tribes and Alaska Native Villages can exercise self-determination in the use of those funds, including pooling resources from various U.S. Government agencies, to carry-out this work.[29]

d. ***Redress Indian Education.*** The U.S. Government should better fulfill its Treaty and trust obligations, consistent with the full scope of its authority to act on behalf of Indians under various articles and clauses of the Constitution, by investing in high-quality elementary, secondary, and higher education for American Indian, Alaska Native, and Native Hawaiian individuals. This investigation reveals the historical U.S. strategy to use education systems against Indian Tribes and the Native Hawaiian Community. In response, the U.S. Government should adequately fund the Bureau of Indian Education and increase investments to Tribal and public school systems to support American Indian, Alaska Native, and Native Hawaiian students. The U.S. Government should also consider ways to promote public higher education access by providing nationwide in-state tuition rates for American Indian, Alaska Native, and Native Hawaiian individuals at public colleges and universities receiving U.S. Government support. U.S. Government education funding to Indian Tribes and the Native Hawaiian Community should be delivered with minimal agency administrative barriers and represent a correct response to education needs, including for modern infrastructure and water and sanitation systems.

e. ***Revitalization of First American Languages.*** First American languages, those spoken by the Indigenous Peoples of the United States, are a vital aspect of identity, improve academic performance, are foundational to individual and group healing, and bolster socioeconomic resilience. The Federal Indian boarding school system, and assimilationist policies, have severely damaged the ability of American Indian and Alaska Native individuals to use, develop, and transmit their languages, oral histories, and knowledge to current and future generations.

The U.S. Government should provide funding to repair that damage and affirm that Indian Tribes and the Native Hawaiian Community have the right to revitalize and use their languages. This funding should support community-based efforts to preserve and revitalize Indian and Native

[29] U.S. Government action should be consistent with the commitments laid out in President Biden's Executive Order 14112, *Reforming Federal Funding and Support for Tribal Nations To Better Embrace Our Trust Responsibilities and Promote the Next Era of Tribal Self-Determination*.

Hawaiian languages. These investments should be available to Indian Tribes, the Native Hawaiian Community, community organizations, schools, and universities in a way that supports language learning and usage by people at all ages and stages of development, and promote ownership of intellectual property by Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community.

3. **Build a National Memorial.** The U.S. Government should establish a national memorial to acknowledge and commemorate the experiences of Indian Tribes, individuals, and families within the Federal Indian boarding school system. This memorial should be accessible to the American people, so it may also educate the nation about the existence and effects of these institutions and honor the loss of American Indian, Alaska Native, and Native Hawaiian children.

4. **Identify and Repatriate Children who Never Returned from Federal Indian Boarding Schools.** The U.S. Government should assist individuals in locating the records of their family members who attended Federal Indian boarding schools. Where children are known to have died and been buried at burial sites, the U.S. Government should assist individuals in locating the burial sites of their family members and supporting them, and Tribes, in any efforts to either protect those burial sites or repatriate their remains to their homelands. Congress should amend the Recreation and Public Purposes Act[30] to facilitate the use of Bureau of Land Management (BLM) lands to allow for the reburial of remains and funerary objects of Indian children who died at Indian boarding schools repatriated pursuant to NAGPRA, or by other authority, and consistent with specific Tribal practices on BLM lands. Many Indian Tribes do not have the land base to rebury human remains and funerary objects in many cases, cultural practices require repatriation to occur in a person's homelands, which are often found on lands managed by the U.S. Government today.

5. **Return Former Federal Indian Boarding School Sites.** The Department should conduct reviews, upon request of Tribes, of property and title documents for former Indian boarding school sites, including land patents provided to religious institutions and organizations or states, including during territorial status. When required by patent, deed, statute, or other law, including reversionary clause activation, the Department should work to facilitate the return of those Indian boarding school sites to U.S. Government or Tribal ownership. This includes reversionary clauses under the Indian Appropriation act of September 21, 1922, 42 Stat. 994, 995 ("1922 Act") and Tribal-specific legislation. Where former boarding school sites revert to U.S. Government ownership or remain in U.S. Government

[30] 43 U.S.C. 869 - 869-4.

ownership, the Department should engage with Indian Tribes in government-to-government consultation when asked, to address the ownership and management of those sites, including the protection of burial sites and cultural resources.

6. **Tell the Story of Federal Indian Boarding Schools.** The U.S. Government should work with appropriate institutions to ensure that the American people learn about the role of Federal Indian boarding schools in the history of the United States. This should include allowing people to share their firsthand accounts of their time at Federal Indian boarding schools. Afterward, the U.S. Government should make information regarding Federal Indian boarding schools available to individuals, Indian Tribes, organizations, academic institutions, and government agencies.

7. **Invest in Further Research.** The U.S. Government should make further investments in research regarding the present-day health and economic impacts of the Federal Indian Boarding School system, as well as policies of child removal, confinement, and forced assimilation. This research should be designed to understand how these policies affected mental and physical health outcomes for individuals, families, and their descendants; and, how these policies affected individual, family, and tribal wealth, health, and well-being.

   For biomedical and behavioral research, Congress should appropriate funds to the National Institutes of Health (NIH), in the Department of Health & Human Services, to support research grants, contracts, cooperative agreements, or other transactions to develop new and expand on existing scientific studies, including the Running Bear studies, examining the impact of the Federal Indian boarding school system on American Indian, Alaska Native, and Native Hawaiian physical, mental, and emotional health, parenting practices, and well-being at the individual, familial, and population levels. This action should also include supporting studies in collaboration with Indian Tribes and the Native Hawaiian Community that test and advance culturally-relevant interventions that promote healing from intergenerational trauma at the individual, familial, and population levels.

8. **Advance International Relationships.** The U.S. Government could strengthen engagement with other countries with their own histories of boarding schools or other assimilationist policies, including Canada, Australia, and New Zealand to exchange best practices for healing and redress between Federal governments and Indigenous governments for Indigenous child removal through boarding schools and predatory foster care and adoption practices. To further this goal, the U.S. should expand capacity, including through the Department's Bureau of Indian Affairs (BIA), to support engagement on international Indigenous issues. To strengthen the U.S. Government's expertise on Indigenous issues globally and

connections with other countries, the U.S. Government should establish an ambassador position focused on engagement on international Indigenous issues.

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4. Data Collection Process and Review of Relevant Information

Volume I of this report describes the overall data-collection process and review of relevant information. Beginning in May 2022, the Bureau of Trust Funds Administration (BTFA) continued departmental research related to the Federal Indian boarding school system. For Vol. II, BTFA continued to review U.S. Government record repositories. BTFA completed the work at the American Indian Records Repository (AIRR) in Lenexa, Kansas, and expanded its research at National Archives and Records Administration (NARA) facilities. BTFA conducted research at these nine NARA field locations:

1. Ft. Worth, TX
2. Seattle, WA
3. San Bruno, CA
4. Riverside, CA
5. Chicago, IL
6. Kansas City, KS
7. Atlanta, GA
8. Washington, DC
9. College Park, MD

The total analysis of U.S. Government records for the Federal Indian Boarding School Initiative included:

- **Vol. I:** Potentially responsive box list that included 39,385 boxes (98,462,500 sheets of paper).

- **Vol. II:** Reviewed 103,699 documents under AIRR control (4,098,612 sheets of paper).

  Reviewed 41,098 documents under NARA control (438,862 sheets of paper).

  Total Reviewed: 144,797 documents (4,537,474 sheets of paper).

For the Federal Indian Boarding School Initiative, BTFA implemented a five-step approach to the identification, collection, and research of these record repositories:

1) Identify potentially responsive collections or record series at each location. This record selection step included BTFA teams reviewing record indexes and discussions with the archivists at each location.

2) Review and digitize responsive documents. BTFA teams operated at each of the locations and scanned the documents for review outside of the physical location for key data elements.

3) Review electronic documents for relevant information. BTFA teams reviewed documents for student attendance information, student death information, burial site information, general school information (to the extent not gathered during research for Volume I), and religious and Tribal identity information for the school and individual.

4) Once the specific information was identified within a document, BTFA teams keyed the information into a tool created by BTFA to specifically store the school and student-level information.

5) BTFA teams then formatted the information gathered during the research into the School Profiles for this volume.

Data and research limitations exist given that the research is complex and involves seeking information about hundreds of Indian Tribes and schools spanning nearly two centuries. The data limitations for this phase of research are:

- **Record Locations**
    - BTFA collected documents from only U.S. Government resources described above.
    - BTFA did not digitize records from NARA facilities in totality. BTFA prioritized available documents based on the type of information they contained given the time and other resources available.
    - BTFA did not review potentially available records of other U.S. Government agencies, religious institutions and organizations, or other private record repositories.
- **Record Content**
    - Given the large time period to be reviewed, the records collected varied in consistency and content. Each state, region, and school could have different reporting requirements and those requirements changed over the length of time.
    - Record gaps are not uncommon, even within organized record series. Some schools burned down, for instance, and it is possible that some records were permanently destroyed as a result. In general, historical records are known to have gaps due to missing, destroyed, damaged, or inaccessible records.

- A portion of the NARA documents, especially pre-1900, are hand-written in cursive which can be very difficult to read both with the writing style and the ornate form of cursive writing common to early time periods. Handwritten student listings with dozens or hundreds of students are very time-consuming to review and, at the time of the report, some of these records were still being reviewed and entered. Because these lists are one of the key sources of student deaths, the collection of death information in these records is particularly time-consuming.
- Some documents, due to age or condition, are difficult to read in part or entirely. The time period of boarding school operations studied (1819 to 1969), involved innumerable authors with a wide variety of writing skills, resulting in differences in scope, interpretation, and thoroughness differences from year to year.

- **Combined Records**
  - It was not uncommon for the administrative agency to conduct business on behalf of a school or vice versa. It was not uncommon to have an Indian Tribe's name, an agency jurisdiction, and a boarding school all referenced with similar or the same names.
  - School hospitals were needed to serve the entire community due to lack of medical services being available generally, so names contained within these records were not always able to be determined as related to students versus community members.
- **Record Specificity**
  - Records may not breakdown data by specific schools but may indicate only the region or agency. Some information is at the boarding school program level and cannot be attributed to a specific school or student.
  - Some death information identifies a specific student, but other death information offers only numerical quantities of deaths (e.g., describing a single death with no name or a total number of deaths over a time period). In those instances, if both types of data are discussed, there is often no way to ascertain duplication between the two different types of data. Even when student death information is found in the documents collected, burial location information is less likely to be documented.
- **The Road to Healing Transcripts**

- The Department secured court reporters to transcribe the Secretarial visits on The Road to Healing. Limitations of the transcripts include lapses in transcription given inaudible feedback and the inability to spell or transmit the audio to English when a speaker used their Native language.



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5. Federal Indian Boarding School List Updates

With congressional appropriations totaling $14 million through fiscal year 2024 and additional National Endowment for the Humanities investment, the Department analyzed additional records under its control to update the official list of Federal Indian boarding schools.

The Department found that between 1819 and 1969, the Federal Indian boarding school system consisted of 417 U.S. Government schools across 37 states or then-territories, including 22 schools in Alaska and 7 schools in Hawai‘i. Some individual Federal Indian boarding schools accounted for multiple sites. The 417 U.S. Government Indian boarding schools accordingly comprised 451 specific sites. The list of the names and locations of these schools are included in this report at **Appendix A**. New profiles for

[31] Johnston, F.B., School assembly in Hampton Institute, Hampton, Va. [Photograph]. (between 1899 and 1900). Frances Benjamin Johnston Collection, Library of Congress, Prints & Photographs Division, Reproduction Number: LC-USZ62-94863.

each school are provided in **Appendix B**. School Sites by State are listed in **Appendix C**. Maps of each current state showing the schools are provided in **Appendix D**.

For a school to qualify as a Federal Indian boarding school, for the purpose of the U.S. investigation, the institution must meet four criteria: that the institution (1) provided on-site housing or overnight lodging; (2) was described in records as providing formal academic or vocational training and instruction; (3) was described in records as receiving U.S. Government funds or other support; and (4) was in operation before 1969.

With appropriations to examine additional U.S. Government records, and using the definition of a "Federal Indian boarding school" for the purpose of this investigation, the number of schools increased from 408 schools listed in Volume I to 417. The updates fall into one of five categories:

Net Effect of List Changes

Recategorization of Federal Indian boarding schools from Volume I to Volume II	Federal Indian Boarding School Initiative Report Volume II
Category 1: Schools that were identified as Other Institutions in Volume I of Federal Indian Boarding School Initiative (BSI) reporting, but additional research/documentation for Volume II now meet all four criteria for official Federal Indian boarding school classification.	**+6 schools** 1. St. Pius X Mission Home; Skagway, Alaska 2. Dwight Mission School; Oklahoma 3. Wills Town Mission School; Fort Payne, Alabama 4. Flathead Agency Boarding and Day School; Old Agency, Montana 5. New Hope Academy; Fort Coffee, Oklahoma 6. St. Francis Regis Mission School; Ward, Washington
Category 2: New schools that were not previously identified in Volume I of BSI reporting, but with the documentation located during Volume II research, meet all four criteria for Federal Indian boarding school classification.	**+5 schools** 1. Choctaw and Chickasaw Sanatorium School; Talihina, Oklahoma 2. Methvin Institute; Anadarko, Oklahoma 3. Lone Wolf Boarding School; Lone Wolf, Oklahoma 4. Washita Boarding School; Washita, Oklahoma 5. Stickney Home Mission School for Indians; Washington
Category 3: Merging of Federal Indian boarding schools – two schools that were identified during Volume I reporting that were determined during Volume II research to be the same school.	**-1 school** 1. St. Rose/St. Francis Xavier School and Holy Child Academy; Avoca, Minnesota
Category 4: Separating Federal Indian boarding schools – two sites that have a significant enough change to be considered their own Federal Indian boarding school. If a school changed any two of the three data elements of	**+1 school** 1. Forest Grove Indian Training School separated from Chemawa Indian Training School; Oregon

location, name, or operator, they are considered a new Federal Indian boarding school.	
Category 5: Federal Indian boarding school in Volume I of BSI reporting that upon further research was determined to be an Other Institution.	**-2 schools** 1. Shawnee Boarding School: was related to the Absentee Shawnee Boarding School. BSI researchers also updated the school's name on the "Other Institutions" list to Shawnee Mission Quaker School, as additional research shows it was an Indian day school; Shawnee, OK 2. Puyallup Indian School: Additional research shows it was an Indian day school. When the school moved to the Puyallup reservation and was eventually renamed Cushman Indian School, it did have a boarding component. Cushman Indian School is a separate school on the "Federal Indian Boarding School" list; Squaxin Island, Washington.

The Department acknowledges that some institutions classified as Federal Indian boarding schools for purposes of its investigation continue to operate but without historical assimilationist intention or practices. Instead, the Bureau of Indian Education and Kamehameha Schools are critical to providing quality education opportunities from early childhood through life, accounting for the mental, physical, religious, and cultural aspects of children from Indian Country and the Native Hawaiian Community.

Data Points

The charts in the individual Federal Indian Boarding School Profiles include data points for enrollment, attendance, and capacity. These figures typically came from the Annual Report to the Commissioner of Indian Affairs (ARCIA). The definitions below for "enrollment" and "attendance" are based on instructions for collecting student and school data for the ARCIA. Capacity was not specifically defined in the instructions. Occasionally, these data points were located in other types of documents and may not have complied precisely with the same definition.

Enrollment: The maximum number of unique students over the reporting time period calculated by either taking the data from the prior year or the start of the current year or reflecting additions and deletions for a final number at the close of the year.

Attendance: The number of students present at the institution. The attendance of each student was recorded daily. The total number of days for all students was divided by the total number of days in the reporting time period to calculate the institution's average annual attendance.

Capacity: The maximum number of students that a school could support. In some cases, capacity was the number of students the institution was receiving funding for but did not reflect the entire student population.

The List of Other Institutions includes Indian boarding schools operated by religious institutions and organizations that did not receive U.S. Government support, available in **Appendix F**.

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[32] Photograph No. 313190186; "Shower Room at Blackfoot Reservation, Montana," May 1951; General Photographs of Indians, 1900-1957; Records of the Bureau of Indian Affairs, Record Group 75; National Archives at College Park, College Park, MD. Description: Blackfoot Reservation, Montana, Cutbank Boarding School. Shower room in basement of girls dorm. No heat, cement floor, leaky water pipes. During coldest part of winter girls are not permitted to shower. These are the only showers or facilities of any kind for taking a bath in the girls dorm. Girls had to go from second floor to the basement. Photo by Morrow, May 1951.

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6. List of Other Institutions

The Federal Indian Boarding School Initiative – List of Other Institutions included in this section is a description of institutions that, based on an examination of additional U.S. Government records, met some, but not all four of the criteria to be considered a Federal Indian boarding school, as described above. The Department's investigation identified 1,025 other institutions across 1,027 total sites, including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support. Some of the aforementioned institutions may have involved education of Indian people, mainly Indian children.

While not Federal Indian boarding schools, these other institutions also supported the U.S. Government policy of Indian assimilation. As noted in Vol. I: The Federal Indian Boarding School Initiative investigation did not examine the U.S. Government's Indian day school system, the precursor education system to the Federal Indian boarding school system. The Department has described that "day school instruction is the initial and most important element in the education of the Indian."[34] "To the day school the Indian child

[33] Kilbourne, K. (1931). Miss [illegible] & Orphans [Photograph]. Katherine Kilbourne photograph album of a Jicarilla Apache Nation boarding school in Dulce, New Mexico, 1931 (I.10. verso), Princeton Collections of the American West, Princeton University Library.
[34] ARCIA for 1904, at 394.

comes fresh from the tepee and finds himself at once amid new and strange surroundings."[35] U.S. Government Indian day schools were primarily located on Indian reservations and did not have housing for children directly on-site with the education institution. Indian day schools "have, in nearly every instance, preceded the boarding school" and "in many cases been established through the benevolent efforts of missionaries or the wives of Army officers stationed at military reservations in the Indian [C]ountry."[36]

For purposes of this investigation, the following general descriptions for other institutions are used:

Indian Day School: During the U.S. Government Indian boarding school time-period, day schools could be public or private. In historical documents relating to boarding schools, day school is also defined as a school operating from 9am to 4pm where the children return home to their parents daily. Documentation also indicated that day schools were prevented from providing such things as certain meals and clothing that were provided only at boarding schools.

Sanatorium: During the U.S. Government Indian boarding school period, it was common to use sanitoriums to treat patients with tuberculosis. Some schools converted to sanatoriums when infections escalated. Some sanitoriums were constructed as a medical facility, which also offered education coursework for convalescing youth. Finally, there is a record of at least one Preventorium, which is described as an institution to protect Indian children from going home to conditions perceived as riskier than isolation in the school setting.

Asylum: During the U.S. Government Indian boarding school period, those housed in an asylum were not necessarily mentally ill by modern definitions. Documentation shows a variety of reasons that a student was committed to an asylum.

Orphanage: During the U.S. Government Indian boarding school period, orphan status could be used for full orphan, half orphan, or ward of the State.

A large portion of the List of Other Indian Institutions is comprised of Indian day schools that did not meet the housing criteria. The list indicates the current determination for each of the four criteria. The Federal Indian Boarding School criteria columns indicate "Yes", "No", or "TBD." The list provides information about each institution including a name, other names identified, city, state, and Federal Indian Boarding School criteria.

This phase of work of the Federal Indian Boarding School Initiative focused on further research of Federal Indian boarding schools. Any institutions that met some, but not all four, of the Federal Indian Boarding School criteria, for purposes of the Department's investigation, are documented in the List of Other Indian Institutions. This

[35] ARCIA for 1904, at 392.
[36] ARCIA for 1886, at LXI.

is not definitive confirmation of the Federal Indian Boarding School determination. It represents only what has been documented as of this phase of research. Sometimes, entities on the List of Other Institutions have certain words in their name that may indicate certain attributes of those entities. The words in the name of the institution do not necessarily indicate the type of institution. The data is as of January 1, 2024.

The List of Other Indian Institutions contains the following information:

- **Name** – A primary name used to identify the institution. *An asterisk on the name indicates that this name is currently being used for the institution.
- **Other Names** – Other names by which the institution may have been identified. *An asterisk on the name indicates that this name is currently being used for the institution.
- **City** – The nearest city identified that represents where the institution is physically located.
- **State** – The state identified that represents where the institution is physically located.

The Federal Indian Boarding School Initiative investigation also did not examine the Outing System. First established by the Carlisle Indian Industrial School, U.S. Government Indian boarding schools "placed out" Indian children to non-Indian families in surrounding communities to work.[37] As described to the Interior Secretary in 1928:

> The system is conducted under very rigid rules and in its operation suggests the parole system of a correctional institution. It is not surprising that an Indian who has seen something of the present system characterizes it as a kind of peonage which the children must undergo. 'As food appropriations at the school get short they think they must turn the children out,' he says.[38]

[37] Lewis Meriam, Institute for Government Research, The Problem of Indian Administration, 627 (1928) [hereinafter Meriam Report].
[38] Id.

Schools placed Indian children "in the homes of *substantial people*, usually Quakers, with the understanding that they were to be treated as members of the family with school privileges if they remained during the school year, but under strict supervision..."[39] Although the Federal Indian Boarding School Initiative investigation did not examine the Outing System, the Department recognizes this additional experience to Federal Indian boarding school attendance often was harmful as well.

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7. Indian Child Names and Tribal Identities

> "…[I]n my research looking for her records, I have looked upon ledger after ledger after ledger of names of children and

[39] Id. (emphasis added).
[40] SMC Cartographic Section Concho, Oklahoma. (n.d.) *SMC Express, Elementary Education Leupp School, SMC + school staff* [Photograph]. Pp. 75-76, "Pictures of Pupils 822.7," Record ID 075-02-0791-0025-0036, Box Identifier 83051, File Identifier 3460098, American Indian Records Repository, Lenexa, KS.

their ages and their tribes. It's just heartbreaking when you see the thousands of names that, you know, until now have been forgotten." [41]

- The Road to Healing, Arizona Visit

Based on available records, the Department has been able to identify by name and Tribal identity at least 18,624 Indian children who attended Federal Indian boarding schools between 1819 and 1969. This number is not a complete count of all children who attended Federal Indian boarding schools, but instead represents the number of individuals whom the Department can identify by name and Tribal identity in this investigation. It also does not include children who: attended a Federal Indian boarding school outside 1819-1969, may be listed as an attendee on records not available to the Department including those of religious institutions and organizations, or may be listed as an attendee of an Other Institution including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support. This information confirms for Indian Tribes, countless Indian families, and individuals the attendance of select individuals at schools in the Federal Indian boarding school system. The Department acknowledges that the actual number of children who attended Indian boarding schools is greater.

Appendix G provides a list of Tribal identities. Data collected represents the Tribal identities identified at Federal Indian boarding schools. The number of Federal Indian boarding schools is unique to each line of data. Individual Tribal identities do not add up to totals as schools can contain multiple Tribal identities. **Appendix H** provides a Graph of Deceased Indian Children by Year. **Appendix I** provides a List of Deceased Indian Children by Indian Tribe.

Based on available records, the Department concludes that at least 973 documented Indian child deaths occurred in the Federal Indian boarding school system. This information is not complete and does not count children that died who: attended a Federal Indian boarding school outside the period 1819-1969, may be listed as an attendee on records not available to the Department including those of religious institutions and organizations, or may be listed as an attendee of an Other Institution including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support. The Department acknowledges that the actual number of children who died while in Indian boarding schools is greater.

[41] The Road to Healing, Arizona Transcript 19 (2023).

Because some records are no longer available, the Department recognizes that there may be missing information for certain Indian children who attended a school in the Federal Indian boarding school system. The Department did not examine potentially available records out of its control, including those held by other U.S. Government agencies or religious institutions and organizations.

For identified students, available U.S. Government records document various names, whether a given name or renamed English name, gender, Tribal identity, date of birth, date of death, and the Federal Indian boarding school(s) or Other Indian Institution(s) the individual attended. Available U.S. Government records also provided year(s) of attendance and status at the institution. Note that some individuals may not necessarily have attended the other institution as a Federal Indian boarding school student. For example, the individual may have been classified as a patient. Data is as of January 1, 2024.



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[42] Photograph No. 251699 (Photograph probably made by Charles R. Scott, an employee of the Seneca Training School, for Superintendent Horace B. Durant); "Group of School Children," 1905; Photographs, 1982-1982; Records of the Bureau of Indian Affairs, Record Group 75; National Archives at Fort Worth, Fort Worth, TX. [Online version, https://catalog.archives.gov/id/251699, National Archives and Records Administration, December 9, 2023.]

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8. Marked and Unmarked Burial Sites



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On **May 23, 1881**, Chief Spotted Tail and parents from the Rosebud Sioux Tribe wrote a letter to the United States Indian Service, requesting the return of human remains of their children buried at the Carlisle Indian Industrial School, Pennsylvania to the Rosebud Sioux Indian Reservation in South Dakota.

On **July 14, 2021**, the United States honored that request when the U.S. Army returned the following human remains of children from the U.S. Army Carlisle Barracks to the Rosebud Sioux Tribe alongside U.S. Interior Secretary Haaland:

Dennis Strikes First (Blue Tomahawk); Rose Long Face (Little Hawk); Lucy Take The Tail (Pretty Eagle); Warren Painter (Bear Paints Dirt); Ernest Knocks Off (White Thunder); Maud Little Girl (Swift Bear); Alvan, aka Roaster, Kills Seven Horses, One That Kills Seven Horses; Friend Hollow Horn Bear; and Dora Her Pipe (Brave Bull).

After 140 years, the Rosebud Sioux Tribe brought the human remains of their children back to their home territory on the Rosebud Sioux Indian Reservation in South Dakota.

[43] Associated Press Photo, Matt Rourke, 2021.
[44] Notice of Intended Disinterment, 86 FR 17373, (2021), Letter from Chief Spotted Tail & Other Rosebud Sioux Chiefs to Richard Henry Pratt (May 23, 1881).

The Department confirms the presence of 74 marked and unmarked burial sites at 65 different Federal Indian boarding schools based on available records.

The composition of the approximate numbers of identified burial sites to date is as follows:

- **Marked burial sites – 53**
- **Unmarked burial sites – 21**

This information is not complete and does not include burial sites that may be: associated with Federal Indian boarding schools in operation outside the period 1819-1969, listed on records not available to the Department including those of religious institutions and organizations, or associated with Other Institutions including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support. The Department acknowledges that the actual number of burial sites associated with Indian boarding schools is greater.

Profiles for each school are provided in **Appendix B**. If the Department identified a burial site associated with the school site, the profile describes the burial site by designation. If documented as "marked", U.S. Government records provided evidence of physical grave markers. If documented as "unmarked", U.S. Government records provided no evidence of physical markers. If documented as "onsite", U.S. Government records placed the burial site location at the school or adjacent to it. If documented as "offsite", U.S. Government records placed the burial site further away from the school, such as in a surrounding community.

To identify marked and unmarked burial sites across the Federal Indian boarding school system, the Department faced several research limitations including: (1) inconsistent U.S. Government reporting of child deaths, including the number and cause or circumstances of death, and burial sites; and (2) non-examination of potentially relevant records in the control of other U.S. Government agencies or religious institutions and organizations.

The Department will not make public the specific locations of burial sites associated with the Federal Indian boarding school system, in order to protect against the well-documented occurrence and threat of grave-robbing, vandalism, and other disturbances to Indian burial sites.[45]

The Department is working with Indian Tribes that wish to repatriate or not disturb any human child remains and funerary objects from historical Indian boarding school sites

[45] *See, e.g.*, 3 C.F.R. §§ 7.18, 10.3 (2023).

that are currently located on U.S. Government lands consistent with specific Tribal practices and, as may be applicable, under the NAGPRA and ARPA processes.

The Department supports the OAC, United States Army collaborating with Indian Tribes, Alaska Native Villages, and descendants regarding the 180 human child remains buried at the Carlisle Barracks Main Post Cemetery consistent with specific Tribal practices for disinterment, continued safeguarding of child remains at the cemetery, or headstone modification.



Annual Memorial Services, Haskell Cemetery.

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9. Indian Treaties Involving the Federal Indian Boarding School System and Indian Education

[46] Annual Memorial Services, Haskell Cemetery. From "The Baccalaureate Address," by R. Harlan, 1913, June, *The Indian Leader*, *XIV*, p. 11.

The Federal Indian Boarding School Initiative Investigation notes that Indian education is a priority in U.S.-Indian relations and U.S. Government provision of Indian education is a Treaty-right, evidenced by the 171 Indian Treaties that the U.S. entered into with Indian Tribes and ratified that implicate the Federal Indian boarding school system or education generally, provided in Appendix J.

As described in Volume I: Through treaties and other agreements, Indian Tribes ceded to the United States approximately 1 billion acres of land.[47] Like Great Britain and the colonial governments before it, the United States negotiated and entered into formal treaties with Indian Tribes as separate and distinct sovereigns.[48] From 1722 to 1869, the British Crown and the United States made at least 374 treaties with Indian Tribes.[49] As non-Indian settlement increased over time, the negotiation power of Indian Tribes diminished. A congressional report appendix stated that "[e]ducation policy … took place in the context of wave after wave of invasion by white settlers reinforced by military conquest. Treaties, although almost always signed under duress, were the window dressing whereby we expropriated the Indian's land and pushed him back across the continent."[50]

Indian Treaties remain valid federal law today as recognized by the Supreme Court.[51] As described in Vol. I, the "text of many Indian treaties evinces that Indian education was a priority in U.S.-Indian relations."[52]

The Treaty Clause of the Constitution reads:

> This Constitution, and the laws of the United States which shall be made in pursuance thereof; and all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land; and the judges in every state

[47] Kennedy Report, at 143.
[48] National Records and Archives Service, General Services Administration, Ratified Indian Treaties 1722-1869, at 1 (1973).
[49] Id.
[50] Kennedy Report, at 142.
[51] U.S. Const. Art. VI., cl. 2; McGirt v. Oklahoma, 140 S.Ct. 2452, 2469 (2020); Herrera v. Wyoming, 139 S.Ct. 1686, 1696 (2019); Washington v. Cougar Den, 139 S.Ct. 1000, 1013 (2019); Minnesota v. Mille Lacs Band of Chippewa Indians, 526 U.S. 172, 202 (1999).
[52] Dep't of Interior, Bryan Newland, Federal Indian Boarding School Initiative Investigative Report 33 (May 2022) (BIA Report).

> shall be bound thereby, anything in the Constitution or laws of any State to the contrary notwithstanding.[53]

As a result, Indian Treaties and successive statutes, including during the Federal Indian boarding school era, originate with the Constitution and involve U.S.-Indian relations;[54] U.S.-Native Hawaiian relations;[55] and political relationships unique to Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community.[56]

The Department confirms that the United States entered into **171 Treaties** with Indian Tribes that implicate the Federal Indian boarding school system or general U.S. Government provision of education to Indians. The United States and respective Indian Tribes made the Treaties between 1819 and 1868.

Appendix J provides: the ratifying legislation citation, year, treaty name, and relevant treaty language, and indicates whether the language refers to an Indian boarding school(s) or general Indian education.

Appendix K provides a List of Federal Indian Policies associated with the Federal Indian boarding school system. The Department acknowledges that this list is not comprehensive.

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[53] U.S. Const. Art. VI., cl. 2.
[54] *See,e.g.,* United States v. Lara, 541 U.S. 193, 201 (2004) ("And for much of the Nation's history, treaties, and legislation made pursuant to those treaties, governed relations between the Federal Government and the Indian tribes.").
[55] *See, e.g.,* Rice v. Cayetano, 528 U.S. 495, 501 (2000) ("the United States and European powers made constant efforts to protect their interests and to influence Hawaiian political and economic affairs in general. The first 'articles of arrangement' between the United States and the Kingdom of Hawaii were signed in 1826 … and additional treaties and conventions between the two countries were signed in 1849, 1875, and 1887").
[56] *See* Yellen v. Confederated Tribes of the Chehalis Reservation, 141 S. Ct. 2434, 2440 (2021); United States v. Cooley, 141 S. Ct. 1638, 1642 (2021); McGirt v. Oklahoma, 140 S. Ct. 2452, 2477 (2020); Doe v. Kamehameha Schools/Bernice Pauahi Bishop Estate, 470 F.3d 827, 847 (9th Cir. 2006) (en banc); Worcester v. Georgia, 31 U.S. 515, 557 (1832).

10. The Role of Religious Institutions and Organizations in the Federal Indian Boarding School System

The Federal Indian Boarding School Initiative Investigation determined that the United States entered into public-private relationships with religious institutions and organizations, with direct U.S. Government support for 59 different religious institutions and organizations to advance the Federal Indian boarding school system, which might face constitutional challenges today. The list of religious institutions and organizations is provided in Appendix L.



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It is surprising to how many very common customs these old beliefs apply and how firmly they are held by them. Their pagan beliefs therefore constitute the chief basis of life, so that little change is possible, except through a change in religion. Pagan Indians have a peculiar religious philosophy which so powerfully, shapes their lives in the wrong direction that only the true inculcations of the true religions can set them right. The hope of the Indian's regeneration, therefore, lies not in

[57] Photograph No. 518925; "Little Girls Praying Beside Their Beds, Phoenix Indian School, Arizona," 1900; Exhibit Prints Related to Various Jurisdictions, Tribes, Indian Schools and Activities, 1904-1936; Records of the Bureau of Indian Affairs, Record Group 75; National Archives at College Park, College Park, MD.

> education alone, nor in civilization alone, but in Christianity united with these great forces.
>
> - Daniel Dorchester, Superintendent of Indian Schools, BIA.[58]

Volume I of this investigation describes the public-private relationship between the United States and religious institutions and organizations in U.S.-Indian relations, that might face constitutional challenges today.

Based on available U.S. Government records, the Department concludes that the United States supported at least **59** different religious institutions and organizations to operate or support schools in the Federal Indian boarding school system. Accordingly, **210 of 417** Federal Indian boarding schools were operated by a religious institution or organization. This number does not include Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support. This volume lists the religious institutions and organizations that the U.S. provided support to, provided in **Appendix L**.

Overall, the religious institution and organization operation is as follows:

- **The Catholic Church:** 80
- **Protestant Denominations:** 134
- **Other Denominations:** 4 (Independent, Nonsectarian Missionary, Unitarian Church, and the United Brethren in Christ).

Individual religions do not add up to the total Federal Indian boarding schools because, over time, many operated under multiple religious institution or organizational affiliations. Data is as of January 1, 2024.

"The Catholic mission … with the meekness and humility of the true Christian, they prefer, to the cold and heartless ceremonies of fashionable life, the more pleasant and philanthropic duty of training up the rude children of the forest to intelligence and [C]hristianity."

- E. Murray, Superintendent of Menominee Territory

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[58] ARCIA for 1891, at 538.
[59] ARCIA for 1852, at 35.

The Department also acknowledges that under authorization from Congress, it issued numerous land patents to religious institutions and organizations for existing religious or school activities on Indian reservations. At the turn of the 20th century, Congress passed special statutes for specific Indian reservations and the Territory of Alaska authorizing the Department to issue land patents to religious institutions and organizations for given areas used for religious or school purposes.

The 1900 Act governing land disposition in the Territory of Alaska directs:

> The Indians or persons conducting schools or missions in the Territory of Alaska shall not be disturbed in the possession of any lands actually in their use or occupation on June 6, 1900, and the land, at any station not exceeding six hundred and forty acres, occupied on said date as missionary stations among the Indian tribes in the section, with the improvements thereon erected by or for such societies, shall be continued in the occupancy of the several religious societies to which the missionary stations respectively belong, and the Secretary of the Interior is directed to have such lands surveyed in compact form as nearly as practicable and patents issued for the same to the several societies to which they belong; but nothing contained in this Act shall be construed to put in force in the Territory the general land laws of the United States.[60]

For this investigation, the Department did not examine the number of land patents it issued to religious institutions and organizations in the then-Territory of Alaska.

In 1909, Congress passed the Indian Appropriation Act (the 1909 Act), authorizing the Secretary of the Interior to issue unrestricted land patents to religious institutions and organizations or missionary boards already engaged in religious or school activities on Indian reservations. The 1909 Act states:

> That the Secretary of the Interior is hereby authorized and directed to issue a patent in fee simple to the duly authorized missionary board, or other proper authority of any religious organization engaged in mission or school work on any Indian reservation, for such lands thereon as have been heretofore set apart to and are now being used and occupied by such organization for mission or school purposes.[61]

[60] June 6, 1900, ch. 786, §27, 31 Stat. 330 (1900).
[61] Indian Appropriation Act of March 3, 1909, ch. 263, 35 Stat. 781, 814 (1909).

In 1922, Congress enacted another statute (the 1922 Act), authorizing the Secretary of the Interior to issue land patents of up to 160 acres to religious institutions and organizations or missionary boards already engaged in religious or school activities on Indian reservations. The 1922 Act notably requires that Indians maintain a reversionary interest in such land patents:

> That the Secretary of the Interior is hereby authorized and directed to issue a patent to the duly authorized missionary board, or other proper authority, of any religious organization engaged in mission or school work on any Indian reservation for such lands thereon as have been heretofore set apart to and are now being actually and beneficially used and occupied by such organization solely for mission or school purposes, the area so patented to not exceed one hundred and sixty acres to any one organization at any station: *Provided*, That such patent shall provide that when no longer used for mission or school purposes said lands shall revert to the Indian owner.[62]

For this investigation, the Department did not examine the number of land patents it issued to religious institutions and organizations under the 1909 or 1922 Acts or statutes specific to select Indian reservations.

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11. U.S. Government Support for the Federal Indian Boarding School System

[62] Act of September 21, 1922, ch. 367 § 3, 42 Stat. 994, 995 (1922).



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[63] Students working outside [Photograph]. (ca. 1900-1930). Thomas Indian School glass plate negatives, Box 5; National Museum of the American Indian, Smithsonian Institution (Catalog Number N49089).

In this report, the Department estimates that the U.S. Government made appropriations available of more than $23.3 billion in FY23 inflation-adjusted dollars between 1871 and 1969 for the Federal Indian boarding school system as well as other similar institutions and associated assimilation policies.

Due to time and resource constraints, we did not research actual amounts spent on Federal Indian boarding schools and similar institutions. Further research on actual expenditures would help to further illuminate the extent of U.S. Government resources committed to this policy.

In some instances, Congress made lump-sum appropriations that included multiple categories of appropriations. In these cases, it is not possible to quantify how much of a general appropriation is attributable to Federal Indian boarding schools, other similar institutions, and related assimilation policies or programs. So as not to exclude relevant appropriations, the Department has included the full amount of these lump-sum appropriations in the overall estimate. Further details on the appropriations included in the Department's estimate are available in section 11 and **Appendix M** of this report.

Acknowledging these limitations and the uncertainty inherent in any estimate of U.S. Government appropriations for the purposes of this report, this report relies on $23.3 billion as the estimated U.S. Government appropriations available for the Federal Indian boarding school system, as well as other similar institutions and associated assimilation policies.

This amount excludes the following: Treaty-stipulated support, religious institution and organization support, U.S. military support, state support, wealth generated by Indian or Native Hawaiian children while in the system including for the agriculture and railroad industries, Indian domestic and other labor for non-Indian families and communities through the Outing System, and expenditures by non-federal entities.

Further, the Department did not analyze appropriations beyond the Federal Indian boarding school system. That is, a separate financial analysis is needed for appropriations associated with Federal Indian boarding schools operational outside 1871-1969 or associated with Other Institutions including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support in order to create a complete picture of the resources that supported these policies.

The total amount appropriated by year is based upon available U.S. Government records and information.

The Department analyzed Federal appropriations for the Federal Indian boarding school system for the years 1819 through 1969. Prior to 1871, Indian boarding schools were funded through treaty stipulations. Following the end of formal treaty making, Congress began to make general appropriations for the system in fiscal year 1871 and specific appropriations for the system in fiscal year 1875. Therefore, **Appendix M** addresses federal appropriations from 1871 forward.

The Department first reviewed Volumes 15-82 of the Statutes at Large from the Library of Congress to identify yearly appropriations and then reviewed each year's appropriations Acts to identify general and specific appropriations. **The total amount appropriated by year is based on available U.S. Government records and information.**

To ensure that the numbers are reported as accurately as possible despite intermingled appropriations, the Department created multiple labeled columns by year that reflect how the appropriations were made for that year. Within a given year, there may have been general appropriations, specific appropriations, or both. Also, general appropriations and specific appropriations vary within years and from year to year regarding the type of schools and nature of the expenses they cover. Each of these distinctions in yearly appropriations is reflected in **Appendix M**, which are categorized first by general or specific appropriations, and then by subtype. The columns are described in detail below:

General Appropriation - Education & Support of Federal Indian Industrial & Federal Indian Day Schools Not Otherwise Appropriated For: General appropriations include both Indian Industrial schools (which had a boarding component) and Indian day schools for which there was no specific appropriation. There is no breakdown of the respective appropriated amounts allocated between Indian Industrial schools and Indian day schools.

General Appropriation - Education & Support of Federal Indian Industrial & Federal Indian Day Schools & Public Schools Not Otherwise Appropriated For: General appropriations include Indian Industrial schools and Indian day schools as well as public schools. There is no breakdown of the respective appropriated amounts allocated amongst these three types of schools.

General Appropriation - Other Appropriation for Federal Indian Industrial & Federal Indian Day Schools Not Otherwise Appropriated For: Other support includes construction, repairs, supplies, sewage, water, electricity, barns, superintendents of the individual schools, livestock, etc.

General Appropriation – Federal Indian Industrial & Federal Indian Day Schools & Public Schools – Transportation: General appropriation for the transportation of Indian students to Indian Industrial, Indian day, and public schools, and placement under

the care and control of white families. There is no breakdown of the respective appropriated amounts allocated amongst these three types of schools and for placement with white families.

General Appropriation - Lump Sum Appropriation for all expenses for Indian Education & Indian Welfare Services, including Federal Indian Day, Federal Indian Boarding, State Schools, and Public Schools and Other Expenses: There is no breakdown of the respective appropriated amounts allocated amongst these types of funding.

- For example, FY 1964: "Bureau of Indian Affairs - For expenses necessary to provide education and welfare services for Indians, either directly or in cooperation with States and other organizations, including payment (in advance or from date of admission), of care, tuition, assistance, and other expenses of Indians in boarding homes, institutions, or schools; grants and other assistance to needy Indians; maintenance of law and order, and payment of rewards for information or evidence concerning violations of law on Indian reservations or lands; and operation of Indian arts and crafts shops and museums; $89,235,250."

Specific Appropriation - Education & Support of Non-Reservation Federal Indian Boarding Schools: Appropriations were for the education and support of specific Non-Reservation Boarding Schools.

Specific Appropriation - Education & Support of Non-Reservation Federal Indian Boarding Schools Combined with Specific Other Appropriation for Non-Reservation Federal Indian Boarding Schools: Appropriation is for Education and Support of specific schools along with specific other appropriation by school for construction, repairs, supplies, sewage, water, electricity, barns, superintendents of the individual schools, livestock, transportation, employees (including farmers & school superintendents), etc. Some appropriations also include "Other Schools" without further specification. Amounts for education and support cannot be distinguished from other appropriated amounts.

Specific Appropriation - Other Appropriation for Non-Reservation Federal Indian Boarding Schools: The appropriation includes construction, repairs, supplies, sewage, water, electricity, barns, superintendents of the individual schools, livestock, transportation, employees (including farmers & school superintendents), etc.

Specific Appropriation - Alaska (includes Education, Care, Building, & Other Expenses): Prior to fiscal year 1932, the cost of educating Indian students from Alaska was typically included in the General Appropriations or the specific appropriations by school. However, the years 1885-1888 and 1895-1900 included additional language that the General Appropriations, which varied by year, could be used for the education and

support of children in Alaska (without specifying how the appropriations should be distributed among day or industrial schools).

- For example, FY 1918 - General Appropriations: "The provisions of this section shall also apply to native Indian pupils of school age under twenty-one years of age brought from Alaska."

  FY 1918 - Specific Appropriations - Salem School: "For support and education of six hundred Indian pupils, including native Indian pupils brought from Alaska, at the Indian school, Salem Oregon …"

  FY 1900 - General Appropriations: "of which amount the Secretary of the Interior may, in his discretion, use five thousand dollars for the education of Indians in Alaska ..."

Beginning with the appropriations for 1932, and ending in 1947, specific funding was appropriated for "Natives in Alaska."

- For example, FY 1933: "Natives in Alaska: To enable the Secretary of the Interior, in his discretion and under his direction to provide for support and education of the Eskimos, Aleuts, Indians, and other natives of Alaska, including necessary traveling expenses of pupils to and from industrial boarding schools in Alaska; erection, purchase, repair, and rental of school buildings, including purchase of necessary lands; ..."

Total Expenditure of Specific Appropriations for Non-Reservation Indian Boarding Schools Not to Exceed X Amount (includes Education, Support, & Other Expenses): Appropriation language specified that the total expenditure of specific appropriations for Non-Reservation Indian Boarding Schools (excluding Alaska) was not to exceed a certain amount. However, the total amount specifically appropriated exceeded the expenditure cap in most instances.

The estimated value of historical appropriations is adjusted to 2023 U.S. Dollars. Official data for the Consumer Price Index (CPI) comparable to the modern version maintained by the U.S. Bureau of Labor Statistics did not exist prior to 1913. An index assembled by the Minneapolis Federal Reserve Bank estimating inflation back to 1800 was used for the adjustments shown in **Appendix M**.

The Department did not analyze appropriations beyond the Federal Indian boarding school system. That is, for a complete picture of the resources that supported these policies, a separate financial analysis is needed for appropriations and expenditures associated with Federal Indian boarding schools operational outside 1819-1969 or associated with Other Institutions including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and as well as expenditures by Indian boarding schools operated by religious

institutions, and organizations that received no Federal support. The Department acknowledges that the actual amount of funds spent on Indian boarding schools is likely far greater, and must include Indian child labor both for institution operations and through the Outing System to non-Indian families.



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12. Preventing Indian Child Removal: The Indian Child Welfare Act

> **"Before the Indian boarding schools, we took wagonloads of laundry down to the river, and all my aunts would wash their clothes in the river on the rocks; and we would hang them over the willow trees that would grow in there, while we fished. We lived off wildlife. I never knew you bought meat from a market. We lived off the deer, the rabbits, pheasants, prairie dogs."**
>
> \- The Road to Healing Montana Participant

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Over time, U.S. policy for Indian assimilation through Indian child removal and confinement to the Federal Indian boarding school system, including the Outing System, lost political support. The U.S. Government shifted support to state

[64] Kilbourne, K. (1931). Miss [illegible] & Orphans [Photograph]. Katherine Kilbourne photograph album of a Jicarilla Apache Nation boarding school in Dulce, New Mexico, 1931 (I.10. verso), Princeton Collections of the American West, Princeton University Library.
[65] Montana Transcript, 36 edited for clarity.

action to remove Indian children for mainstream U.S. assimilation.[66] The health effects, described below, however, to individual American Indians and Alaska Natives from the Indian boarding school experience remained. And studies suggest that adverse health effects may also be associated with the placement of Indian children in non-Indian foster care and adoptive homes.

As described in Vol. I, Indian childhood experiences in Indian boarding schools, "at a minimum, the separation from family," contributed to poor health impacts on child attendees as adults.[67] The Running Bear studies, funded by the National Institutes of Health (NIH), are the first biomedical studies to systematically and quantitatively examine the relationship between American Indian boarding school child attendance and physical health status, the number of physical health conditions diagnosed by a medical doctor, and specific chronic health conditions, while also controlling for parental attendance in a large sample. The "[c]ombined direct indirect results (beta = -.39, CI = -1.20, .42) show American Indians who attended boarding school have lower physical health status (beta = -1.22, CI = -2.18, -.26, p. ≤ .01) than those did not."[68] Indian boarding school child attendees had a 44 percent greater count of past-year chronic physical health problems (PYCPHP) as adults compared with adult non-attendees.[69] Now-adult attendees were more likely to have cancer (more than three times), tuberculosis (more than twice), high cholesterol (95 percent), diabetes (81 percent), anemia (61 percent), arthritis (60 percent), and gall bladder disease (60 percent) than non-attendees.[70] Other studies demonstrate that now-adult attendees experience increased risk for post-traumatic stress disorder (PTSD), depression, and unresolved grief.[71] As a result, a "prevailing sense of despair, loneliness, and isolation from family and community are often described."[72]

"Both individual and paternal boarding school attendance are associated with chronic health problems" of now-adult Indian boarding school attendees.[73] A father's Indian boarding school attendance was independently associated with chronic physical health problems.[74] Participants whose fathers attended Indian boarding school had on

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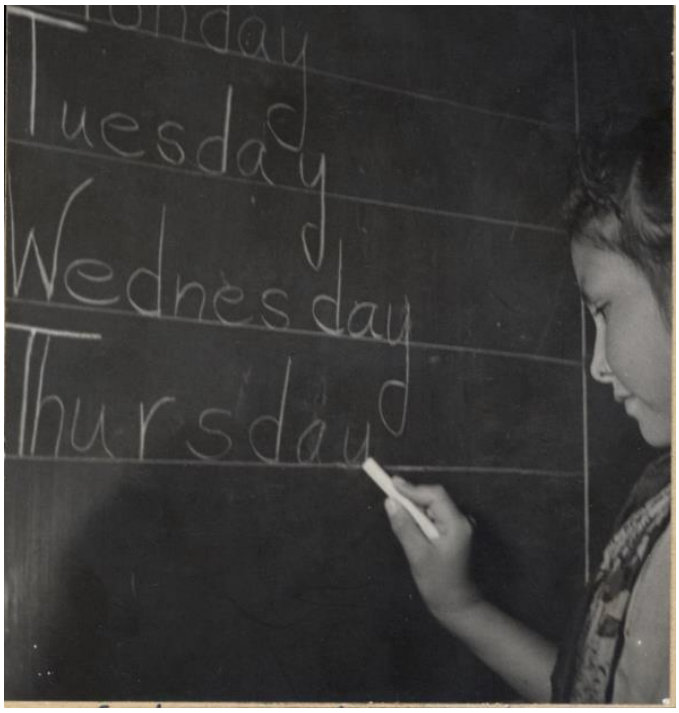
[66] Matthew L.M. Fletcher & Wenona T. Singel, Indian Children and the Federal-Tribal Trust Relationship, 95 Neb. L. Rev. 885 (2016).
[67] Maria Yellow Horse Brave Heart, The Historical Trauma Response Among Natives and Its Relationship with Substance Abuse: A Lakota Illustration, 35 J. of Psychoactive Drugs 1, 7-13 (2003).
[68] Ursula Running Bear et al., Boarding School Attendance and Physical Health Status of Northern Plains Tribes, 13 Applied Res. in Qual. of Life 633 (2018).
[69] Ursula Running Bear et al., The Impact of Individual and Parental American Indian Boarding School Attendance on Chronic Physical Health of Northern Plains Tribes, 42 Fam. Community Health 1, 3-4 (2019).
[70] Id. at 5.
[71] Maria Yellow Horse Brave Heart, The Historical Trauma Response Among Natives and Its Relationship with Substance Abuse: A Lakota Illustration, 35(1) J. of Psychoactive Drugs 1, 7-13 (2003).
[72] Ursula Running Bear et al., Boarding School Attendance and Physical Health Status of Northern Plains Tribes, 13 Applied Res. Qual. of Life 633 (2018).
[73] Ursula Running Bear et al., The Impact of Individual and Parental American Indian Boarding School Attendance on Chronic Physical Health of Northern Plains Tribes, 42 Fam. Community Health 1, 3-4 (2019).
[74] Id. at 4-5.

average a 36 percent greater PYCPHP count than those whose fathers did not attend boarding school.[75] When controlling for maternal and paternal boarding school attendance, only a father's attendance was related to an increased number of PYCPHP in adulthood, suggesting that a father's Indian boarding school attendance is an *independent* predictor of his child's adult PYCPHP.[76] Previous research has noted that American Indian men experienced more physical and sexual abuse in Indian boarding school than women: "Men – more fullblood Lakota in appearance and language – experienced greater trauma in boarding schools including more physical and sexual abuse and experienced greater sadness, survivor guilt, and shame as well as joy."[77] The increased trauma that men faced in the Indian boarding school system may have produced increased stress, which then may affect the biological systems of the body.[78] These stressors may then introduce epigenetic alterations that are then transferred to their children, also known as epigenetic inheritance.[79]



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[75] Id.
[76] Id.
[77] Maria Yellow Horse Brave Heart, The Historical Trauma Response Among Natives and Its Relationship with Substance Abuse: A Lakota Illustration, 35(1) J. of Psychoactive Drugs 1, 7-13 (2003).
[78] Michelle Sotero, A conceptual model of historical trauma: implications for public health practice and research, 1 J. Health Dispar. Res. Pract 93 (2006).
[79] Rachel Yehuda et al., Holocaust exposure induced intergenerational effects on FKBP5 methylation, 80 Biol. Psychiatry 372 (2016); Zaneta Thayer et al., Biological memories of past environments: epigenetic pathways to health disparities, 6 Epigenetics 798 (2011).
[80] Photograph No. 12462819; "Girl Writing on Chalkboard" (Pine Ridge Agency); Photographs, ca. 1923-ca. 1955; Records of the Bureau of Indian Affairs, Record Group 75; National Archives at Kansas City, Kansas City, MO.

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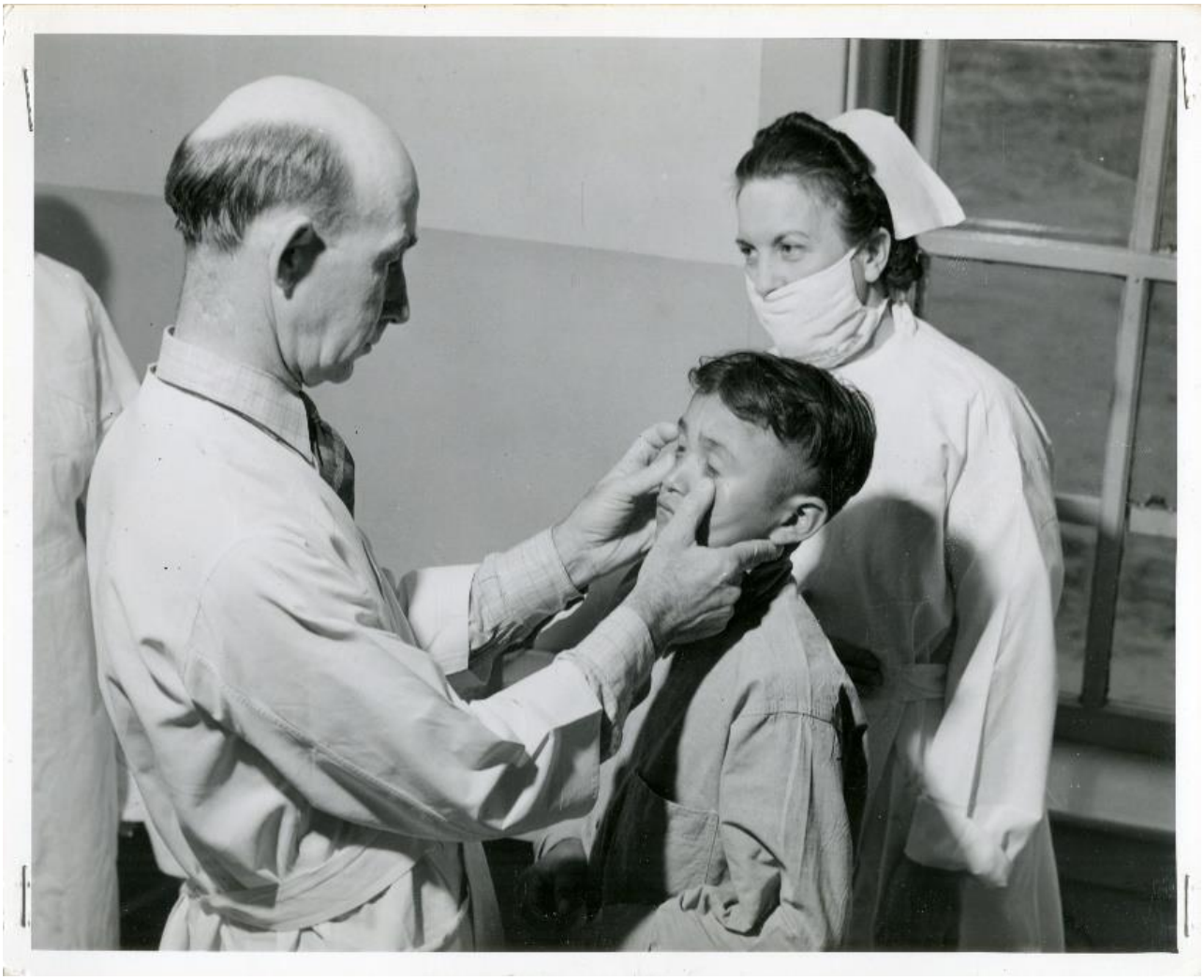

[81] Dr. W. P. Whitted examines the eyes of a trachoma patient, Trachoma School, Fort Defiance, Arizona, 1941. From "*If you knew the conditions . . .*"*: Health Care to Native Americans*, National Library of Medicine. Source: National Library of Medicine. Attributed by National Library of Medicine to the "Courtesy National Archives and Records Administration."



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In the Running Bear studies, American Indian child attendees "punished for the use of language and who were also 8 years or older when attendance began reported the lowest physical health status scores."[83] "The critical age for learning language is up to 7 and 8, after which there is a steep decline."[84] American Indian children "removed from their homes at age 8 or older had a greater degree of language skill and proficiency and may have been more likely to speak their language leading to punishment."[85] Although similar interaction effects are not found for other boarding school experiences, the studies point to other adverse effects.[86] Now-adult attendees with then-limited family visits, forced church attendance, and who were prohibited from practicing their culture and traditions had lower physical health status as adults than those who did not have these experiences in Indian boarding school as children.[87] The Running Bear studies reinforce that Federal Indian

[82] Choate, J. N. (ca. 1898). Six Carlisle students from Alaska in school uniform [Photograph]. Scope and Contents: "Annie Coodlalook, Tomiclock, Laublock, Anna Buck, Cooki Glook, and Esenetuck," Culture: "Alaskan Eskimo," Photo lot 81-12, John N. Choate photographs of Carlisle Indian School, National Anthropological Archives, Smithsonian Institution.
[83] Ursula Running Bear et al., The relationship of five boarding school experiences and physical health status among Northern Plains Tribes, 27 Applied Res. in Qual. of Life 153 (2018).
[84] Dale Purves et al., The development of language: A critical period in humans, in Neuroscience (2d ed.) (2001).
[85] Ursula Running Bear et al., The relationship of five boarding school experiences and physical health status among Northern Plains Tribes, 27 Applied Res. Qual. of Life 153 (2018).
[86] Id.
[87] Id.

boarding school policies "often impacted several generations."[88]

In 1957, as national Indian policy shifted, the U.S. Government, through the Department, coordinated with the Child Welfare League of America to advocate for state social workers on Indian reservations to adopt out Indian children to non-Indian families.[89] The public-private partnership was named the Indian Adoption Project, adopting out hundreds of Indian children to non-Indian families between 1958 and 1968.[90] The Indian Adoption Project supported the broader U.S. policy goal at the time to terminate the legal and political relationship between the U.S. and Indian Tribes—diminishing the already low tribal citizenship base necessary for the security of Indian Tribes and Alaska Native Villages.[91]

As Congress has determined, studies demonstrated that approximately 25-35 percent of Indian children were forcibly removed from their families by state and private child welfare agencies, that such removals were often unwarranted, and that over 85 percent of those Indian children were placed in non-Indian homes.[92] The disparity between Indian and non-Indian removal was stark. For example, in Minnesota the foster care or adoption placement rate of Indian children was 5 times greater than the non-Indian rate; in Washington, the adoption rate was 19 times greater and the foster care rate was 10 times greater; in Montana, the foster care rate was 13 times greater; and, in South Dakota, the foster care rate was 16 times greater.[93] Similar to the Federal Indian boarding school system, as Indian children experienced state foster care and adoption placement with non-Indian foster or adoptive homes or institutions, Federal examination and independent studies indicate that they experienced negative medical outcomes.

Studies examining American Indian and Alaska Native child adoptees as adults reveal poor medical outcomes are associated with Indian adoption and placement in non-Indian homes. Although many adoptees received socioeconomic advantages by virtue of their adoption, Indian adoptees experienced higher rates of depression, low self-esteem, and suicide compared to white adoptees.[94] For example, a 2017 study disclosed that Indian

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[88] Ursula Running Bear et al., The Impact of Individual and Parental American Indian Boarding School Attendance on Chronic Physical Health of Northern Plains Tribes, 42 Fam. & Community Health 1 (2019).
[89] David Fanshel, Far from the Reservation: The Transracial Adoption of American Indian Children 37-8, ix (1972); *See also* Charles F. Wilkinson & Eric R. Biggs, The Evolution of the Termination Policy, 5 Am. Indian L. Rev. 139, 140 (1977).
[90] Id.
[91] Id; *see, e.g.*, Press Release, "Indian Adoption Project Increases Momentum," Bureau of Indian Affairs (Apr. 18, 1967) (praising States "rank[ing] highest … in placing Indian children for adoption in non-Indian homes").
[92] U.S. House of Representatives, Committee on Interior and Insular Affairs, Establishing Standards for the Placement of Indian Children in Foster or Adoptive Homes, To Prevent the Breakup of Indian Families, H.R. Rep. No. 95-1386, 9 (1978); *see also* 25 U.S.C. § 1901(4); *Mississippi Band of Choctaw Indians v. Holyfield*, 490 U.S. 30, 32 (1989).
[93] Id.
[94] Margaret D. Jacobs, A Generation Removed: The Fostering and Adoption of Indigenous Children in the Postwar World 143-46 (2014).

child adoptees as adults are more likely than white child adoptees as adults to report depression (M=88%, M=82% respectively), alcohol addiction (M=28%, M=7% respectively), and drug addiction (M=14%, M=6% respectively).[95] Many child adoptees continue, as adults, to struggle with identity and report feelings of loneliness and isolation.[96]

After centuries of Federal and state Indian child removal, Congress in 1978 found that the "wholesale separation of Indian children from their families is perhaps the most tragic and destructive aspect of American Indian life today."[97] Congress responded by enacting the Indian Child Welfare Act of 1978 (ICWA).[98] At the familial and individual levels, the ICWA provides minimum federal standards in state-court proceedings for the removal of Indian children from their families and placement in foster-care or adoptive homes, and affirms exclusive or concurrent tribal jurisdiction over child-welfare proceedings involving Indian children.[99] As such, ICWA requires prevention-based measures to restore health for Indian children, their families, and Indian Tribes. The Act codifies the opportunity for an Indian child to become exposed to the top protective factors for Indian child and adolescent health: cultural connectedness and family connectedness.[100]

A protective factor is "a characteristic at the biological, psychological, family, or community level that is associated with a lower likelihood of problem outcomes or that reduces the negative impact of a risk factor on problem outcomes."[101] Because protective factors are independently capable of having a direct behavioral effect and positive health effects are recognized to influence the entire community, protective factor enhancement is considered a medical best practice.[102] Key protective factors for general child and adolescent health include connecting with adults beyond family, self-regulation, defined as the deliberate control of emotions, attention, and behaviors to achieve a goal, and academic

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[95] Ashley Landers et al., American Indian and White Adoptees: Are There Mental Health Differences?, American Indian and Alaska Native Mental Health Research, 24(2), 54-75 (2017).
[96] Jacobs, *supra* note 17; Troy Johnson & Holly Tomren, Helplessness, Hopelessness, and Despair: Identifying the Precursors to Indian Youth Suicide, Am. Indian Culture and Res. J., 23, 287-301 (1999).
[97] U.S. House of Representatives, Committee on Interior and Insular Affairs, Establishing Standards for the Placement of Indian Children in Foster or Adoptive Homes, To Prevent the Breakup of Indian Families, H.R. Rep. No. 95-1386, 9 (1978); 25 U.S.C. § 1901; Jacobs, *supra* note 17.
[98] Indian Child Welfare Act of 1978, 25 U.S.C. §§ 1901-1963 (2019).
[99] 25 U.S.C. § 1902, 1911, 1912, 1915.
[100] Michele Henson et al., Identifying Protective Factors to Promote Health in American Indian and Alaska Native Adolescents: A Literature Review, 38(1-2) J. of Primary Prevention, 5-26 (2017).
[101] Mary Ellen O'Connell et al., Preventing Mental, Emotional, and Behavioral Disorders Among Young People: Progress and Possibilities, The National Academies Collection: Reports funded by National Institutes of Health, 78, 82-111 (2009).
[102] Henson, *supra* note 89; Juliette Mackin et al., The Power of Protection: A Population-based comparison of Native and non-Native Youth Suicide Attempts, 19(2) Am. Indian & Alaska Native Mental Health Research, 20-54 (2012); O'Connell, *supra* note 132; Iris Wagman Borowsky et al., Suicide Attempts Among American Indian and Alaska Native Youth: Risk and Protective Factors, Archives of Pediatrics and Adolescent Med., 153, 573-580 (1999);

achievement.[103] However, research suggests that signature protective factors for Indian child health are *distinct* from factors supporting non-Indians.[104] Factors such as cultural connectedness and family connectedness are of particular relevance for Indian children to attain health.[105]

Cultural connectedness refers to culture interest development and identification including transmission of cultural expectations, values, and self-perception of success living the culture and the degree of practicing culture such as Native passage rites, language, and religion.[106] Family connectedness refers to parent-child relationships, parent expectations, and perceived family caring.[107]

American Indian and Alaska Native medical trends manifest the need for protective factor enhancement. The Department of Health and Human Services records that "[d]ifferences in the prevalence of alcohol use, interpersonal problems, and access to mental health treatment among American Indians and Alaska Natives might be symptoms of disproportionate exposure to poverty, *historical trauma*, and other contexts of inequity and should not be viewed as inherent to American Indian and Alaska Native culture."[108]

For example, the suicide rate of American Indians and Alaska Natives ages 15-24 is more than double the national rate (14.1 and 5.8 respectively).[109] Expanding the age range, more than one third (35.7%) of American Indian and Alaska Native decedents from suicide are aged 10-24 years (versus 11.1% of whites).[110] More than two thirds (69.4%) of American Indian and Alaska Native decedents from suicide resided in nonmetropolitan areas, while most white decedents (72.7%) resided in metropolitan areas (adjusted odds ratio [aOR] = 6.6; 95% CI = 5.9-7.3).[111] Moreover, American Indian and Alaska Native decedents from suicide have 1.8 times the odds of a reported alcohol problem compared

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[103] O'Connell, *supra* note 132.
[104] Henson, *supra* note 89.
[105] Henson, *supra* note 89; Brief for the American Academy of Pediatrics and American Medical Association as Amici Curiae supporting Secretary of the Interior & Petitioners, p. 9, Haaland v. Brackeen, 599 U.S. 255 (2023).
[106] Henson, *supra* note 89; Donald Warne, American Indian health disparities: psychosocial influences, 9(10) Social & Personality Psychology Compass, 567-579 (2015); Jia Pu et al., Protective Factors in American Indian Communities and Adolescent Violence, 17 J. of Maternal & Child Health, 1199-1207 (2013); James Allen et al., Suicide Prevention as a Community Development Process: Understanding Circumpolar Youth Suicide Prevention Through Community Level Outcomes, 68(3) Int'l J. of Circumpolar Health 274-291 (2010).
[107] Henson, *supra* note 89; Nancy Whitesell et al., Trajectories of Substance Use Among Young American Indian Adolescents: Patterns and Predictors, 43 J. of Adolescent Health, 437-453 (2014); Les B. Whitbeck et al., Traditional Culture and Academic Success among American Indian Children in the Upper Midwest, 40(2) J. of Am. Indian Educ., 48-60 (2001); Jan-Richard Cummins et al., Correlates of Physical and Emotional Health Among Native American Adolescents, J. of Adolescent Health, 38-44 (1998).
[108] Leavitt RA, Ertl A, Sheats K, et al., Suicides Among American Indian/Alaska Natives — National Violent Death Reporting System, 18 States, 2003-2014, U.S. Dept. of Health & Human Services (2018) (emphasis added).
[109] Casey Family Programs & Center for Native American Youth at the Aspen Institute, The Well-being of American Indian and Alaska Native Youth: Using What We Know to Make Better Policy (2015).
[110] Leavitt RA, Ertl A, Sheats K et al., Suicides Among American Indian/Alaska Natives — National Violent Death Reporting System, 18 States, 2003-2014, U.S. Dept. of Health & Human Services (2018).
[111] Id.

with white decedents (95% CI = 1.6-2.1).[112]

Compared with white decedents, American Indian and Alaska Native decedents have 2.4 times the odds of the suicide of a friend or family member affecting their own death (as established through a note or interviews with persons who knew the decedent) (95% CI = 1.9-3.1) and 1.7 times the odds of the non-suicide death of a family member or friend affecting their own death (95% CI = 1.4-2.1)—suggesting suicide contagion and that overall community health plays a greater role in suicide risk of individual American Indians and Alaska Natives than for white individuals.[113]

In general, the American Indian and Alaska Native population between 2016-2020 experienced alcohol-related deaths at significantly higher rates (51.9/100,000) than the rest of the U.S. population (11.7/100,000)—more than four times.[114] And in 2019 and 2020, drug overdose death rates remained highest for American Indians and Alaska Natives at 30.5 (2019) and 42.5 per 100,000 (2020) despite rates increasing for all populations in the U.S.[115] Between 2019-2020 alone, American Indian and Alaska Native overdose death rates increased by 39 percent.[116]

Research demonstrates that childhood events can negatively affect mental and physical health and cognition over an individual's lifetime.[117] Adverse Childhood Experiences (ACEs) are a measure of potentially traumatic events that occur in childhood (0-17 years) that are assessed by eight challenges: physical abuse, sexual abuse, emotional abuse, intimate partner violence, household substance use, household mental illness, parental separation or divorce, and household member incarceration.[118] Although ACEs are an individual measure, the literature recognizes that ACEs for American Indians and Alaska Natives "may be associated with intergenerational experiences and trauma including genocide of [American Indian and Alaska Native] individuals, abuse from the boarding school system, interruption of traditional practices, and centuries of colonialism."[119]

All ACE scores for American Indians and Alaska Natives are higher compared to those for white individuals: 2.32 M (95% CI = 2.28 - 2.37) versus 1.53 M (95% CI = 1.52 - 1.54); and higher when compared to black and Hispanic individuals: 2.32 M (95% CI = 2.28 - 2.37) versus 1.66 M (95% CI = 1.65 - 1.67) and 1.63 M (95% CI = 1.62 - 1.64)

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[112] Id.
[113] Id.
[114] Hedegaard H, Miniño AM, Spencer MR, Warner M, Drug overdose deaths in the United States, 1999-2020. NCHS Data Brief, no 428, U.S. Dept. of Health & Human Services (2021).
[115] Kariisa M, Davis NL, Kumar S et al. Vital Signs: Drug Overdose Deaths, U.S. Dept. of Health & Human Services (2022).
[116] Id.
[117] Giano Z, Camplain RL, Camplain C et al., Adverse Childhood Events in American Indian/Alaska Native Populations, Am J Prev Med (2021).
[118] Id.
[119] Id.

respectively.[120] Moreover, among American Indians and Alaska Natives, individuals that identify as gay or lesbian have the highest mean ACE score (4.05), with approximately 70 percent of individuals in this category experiencing household substance abuse and parental separation or divorce.[121] Although the smallest population, health outcomes of American Indians and Alaska Natives are extreme compared to the rest of the U.S. population.

Studies markedly reveal, however, that both cultural and family connectedness positively influence Indian child and adolescent resilience, emotional health including depression, suicide attempt, academic success, alcohol, tobacco, and substance use, and delinquent and violent behavior.[122] For example, a 2012 study determined that among high-risk, low-protection groups, the loss of protective factors was associated with a larger increase in reported suicide attempts in Indian youth than in non-Indian youth (from 20 percent - 46 percent and from 17 percent - 26 percent respectively).[123] Research further suggests that historical traumatic experiences can add to an individual's adverse childhood experiences and persist in adverse adult experiences.[124] Core behaviors like coping and parenting are abnormally affected.[125] Unresolved adult issues are then transferred to descendants, creating a negative cycle of adverse childhood experiences in later generations.[126] Medical best practice includes protective factor enhancement because positive health effects are recognized to influence the entire community.[127]

The American Medical Association (AMA) and American Academy of Pediatrics (AAP) as *amici* in *Haaland v. Brackeen* in support of respondent U.S. Secretary Haaland to uphold the Indian Child Welfare Act recognize the medical phenomenon:

> American Indian and Alaska Native children experience historical loss symptoms at roughly the same rate as adults. '[T]he historical losses experienced by North American Indigenous people are not 'historical' in the sense that they happened long ago and a new life has begun. Rather, they are 'historical' in that they originated long ago and have persisted. The reminders of historical loss remain ever present.'

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[120] Id.
[121] Id.
[122] Pu, *supra* note 95; Mackin, *supra* note 37; Allen *supra* note 95; Teresa D. LaFromboise et al., Family, Community, and School Influences on Resilience Among American Indian Adolescents in the Upper Midwest, 32(2) J. of Cmty. Psychology, 193-209 (2006).
[123] Mackin, *supra* note 37.
[124] Casey Family Programs & Center for Native American Youth at the Aspen Institute, The Well-being of American Indian and Alaska Native Youth: Using What We Know to Make Better Policy (2015); Warne, *supra* note 128.
[125] *Id.*
[126] Id.
[127] Mackin, *supra* note 37.

> ICWA provides a clear, sensible mechanism for *preserving family and community connections*.[128]

Limited quantitative research of Federal Indian boarding school survivors, individuals removed to non-Indian foster or adoptive homes or institutions, and current American Indian and Alaska Native individual and population health indicate that Indian child removal alone produces individual and population health changes over time.[129]

Moreover, recent exams of PTSD in patients suggest that "traumatic memories are a qualitatively divergent cognitive entity."[130] That is, brain scan evidence of PTSD patients shows that brain recall of traumatic memories often display as intrusions in the posterior cingulate cortex (PCC) instead of activity in the hippocampus, the part of the brain that organizes and contextualizes memories including processing "regular" negative memories.[131] This means that during traumatic memory reactivation, an individual engages the part of the brain, the PCC, associated with internal processing, self-analysis, or self-relevance.[132] The traumatic memory in turn is not experienced as a regular memory but instead re-lived or re-experienced as "fragments of prior events, subjugating the present moment."[133] Although the understanding of brain function differences in PTSD-associated traumatic memories is emerging, early findings call for increased medical investment in understanding the individual and intergenerational impacts of American Indian and Alaska Native traumatic experiences involving the Federal Indian boarding school system and placement in non-Indian foster or adoptive homes or institutions.

The ICWA strengthens the health status of American Indians and Alaska Natives.[134] U.S. Congress, through the Act, enhanced protective factors by requiring court and agency compliance in state child welfare proceedings with two provisions: active efforts and placement preferences. Congress expressly developed minimum standards for Indian child welfare proceedings requiring the party seeking removal to provide active efforts to prevent the breakup of the Indian family.[135] The Department's ICWA regulations define "active efforts" as "affirmative, active, thorough, and timely efforts intended primarily to *maintain*

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[128] Brief for the American Academy of Pediatrics and American Medical Association as Amici Curiae supporting Secretary of the Interior & Petitioners, p. 14, 27, Haaland v. Brackeen, 599 U.S. 255 (2023) (emphasis added).
[129] Ursula Running Bear et al., The Impact of Individual and Parental American Indian Boarding School Attendance on Chronic Physical Health of Northern Plains Tribes, 42 Fam. Community Health 1, 3-4 (2019); Ursula Running Bear et al., Boarding School Attendance and Physical Health Status of Northern Plains Tribes, 13 Applied Res. Qual. of Life 633 (2018); Maria Yellow Horse Brave Heart, The Historical Trauma Response Among Natives and Its Relationship with Substance Abuse: A Lakota Illustration, 35 J. of Psychoactive Drugs 1, 7-13 (2003).
[130] Perl, O., Duek, O., Kulkarni, K.R. et al. Neural patterns differentiate traumatic from sad autobiographical memories in PTSD. Nat Neurosci 26, 2226-2236 (2023).
[131] Id.
[132] Id.
[133] Id.
[134] Gallegos, Joaquin R., Fort, Kathryn E., Protecting the Public Health of Indian Tribes: the Indian Child Welfare Act, 12 Harvard Pub. Health Rev. (2018).
[135] 25 U.S.C. § 19012(d).

or reunite an Indian child with his or her family."[136] The active efforts regulation with the law supports family maintenance and biological family reunification by requiring parties to assist Indian parent(s) or custodian(s) in executing the state's child welfare case plan as well as in accessing or developing the resources necessary to satisfy the case plan.[137] It also enhances cultural and family connectedness by requiring that agencies, to the maximum extent possible, conduct active efforts "in partnership with the Indian child and the Indian child's parents, extended family members, Indian custodians, and Tribe."[138] Finally, the regulation recognizes that active efforts is not a one-size-fits-all and provides examples of the type of remedial services and rehabilitative programs that may constitute active efforts in a particular case, including assistance to parents and families in accessing community resources such as housing, financial, transportation, mental health, substance abuse, and peer support services.[139]

The ICWA also directs preferences for an Indian child's placement in foster or adoptive homes. The ICWA's placement preferences provision reflects "[f]ederal policy that, where possible, an Indian child should remain in the Indian [Tribe or] community."[140] When a child must be removed from her parent(s) or guardian(s), ICWA requires that a preference be given, "in the absence of good cause to the contrary," to placement with extended family, other members of the child's Indian Tribe, other Indian families, and other preferences authorized by the child's Indian Tribe.[141] Compliance with ICWA's placement preferences protects Indian Children and the survival of Indian Tribes by increasing the odds that the child will remain with her Indian Tribe or Alaska Native Village and connected to her Indian culture. At end, the "limited data we do have about ICWA and child welfare generally indicate the law is a benefit that can directly address adverse childhood experiences."[142]

The U.S. medical field acknowledges that "efforts to destroy native cultures cause trauma that reverberates across generations."[143] A minority of law and policy actors nonetheless continue to bring legal claims attempting to end the ICWA's legal and medical protections for Indian children and Indian Tribes and Alaska Native Villages.

Congress enacted the ICWA to protect Indian children, Indian families, and Indian

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[136] 25 C.F.R. § 23.2.
[137] Id.
Id.
[139] Id.
[140] Indian Child Welfare Act Proceedings Final Rule, 82 Fed. Reg. 38,778, 38782 (June 14, 2016).
[141] 25 U.S.C. § 1915.
[142] Fort, Kathryn E., The Road to *Brackeen*: Defending ICWA 2013-2023 (July 1, 2023), Am. U. Law Review, Vol. 72, No. 5, 2023.
[143] Brief for the American Academy of Pediatrics and American Medical Association as Amici Curiae supporting Secretary of the Interior & Petitioners, p. 9, Haaland v. Brackeen, 599 U.S. 255 (2023); *See* Gallegos, Joaquin R., Fort, Kathryn E., Protecting the Public Health of Indian Tribes: The Indian Child Welfare Act, 12 Harvard Pub. Health Rev. (2018) (discussing how ICWA's protections, specifically, the active efforts and placement preference provisions, can help restore wellness within Indian Tribes by promoting cultural and family connectedness).

Tribes.[144] In so doing, the United States helped prevent repetition of the harms caused by Indian assimilation through the Federal Indian boarding school system and unwarranted removal of Indian children from their homes and predatory state foster care and adoption placement with non-Indian foster or adoptive homes or institutions. In doing so, the U.S. Government acted upon its moral and trust obligations to advance the well-being of American Indians and Alaska Natives.

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13. Indigenous Child Removal: Canada, New Zealand, Australia

The Holy Roman Catholic Church and subsequent branches of Christianity endorsed European colonization of Canada, Australia, New Zealand, and the United States, the "CANZUS states", and ultimately Indigenous child removal for both claimed civilization and Christian conversion. Given that the United States was the first to initiate widescale Indigenous child removal, and the other three countries subsequently adopted those practices, the U.S. should revisit this well-documented history and examine the actions of the other CANZUS states for redressing actions against Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community.

The Holy See[145] issued the following Papal Bulls to authorize Catholic countries in Europe to conquer non-Christians and seize their territories, serving as the basis for The Doctrine of Discovery[146]:

- His Holiness the Pope Nicholas V, 1452, *Dum Diversas*.
- His Holiness the Pope Nicholas V, 1455, *Romanus Pontifex*.
- His Holiness the Pope Alexander VI, 1493, *Inter Caetera*.

The British Empire and France authorized their conquest of non-Christians and seizure of their territories through self-termed discovery and subsequent possession or occupation.[147]

Canada, Australia, New Zealand, and the United States derive from the British Empire and maintain English common law systems.[148] The four countries are distinct, as they have political and legal relationships with Indigenous Peoples based on founding national documents, centuries-old judicial decisions, and legislative and executive actions and instruments—unlike other countries that base official interactions with Indigenous

[144] 25 U.S.C. § 1901.
[145] The Holy Roman Catholic Church.
[146] The Holy See, Joint Statement of the Dicasteries for Culture and Education and for Promoting Integral Human Development on the "Doctrine of Discovery" (2023).
[147] Johnson v. M'Intosh, 21 U.S. 543, 558 (1823); Brian Slattery, "Paper Empires: The legal dimensions of French and English Ventures in North America" in John McLaren, A. R. Buck; Nancy E. Wright, Despotic Dominion, property Rights in British Settler Societies. Vancouver: University of British Columbia Press, 55 (2005).
[148] Johnson v. M'Intosh, 21 U.S. 543, 558 (1823); *see*, Holland Rose, J., Newton, A. P., Benians, E.A., The Cambridge History of the British Empire, Vol. I, II, III (Cambridge Un. Press 1929).

Peoples on human rights or non-binding principles.[149] For example, from 1722 to 1869, the British Crown and the United States entered into 374 treaties with Indian Tribes.[150]

Secretary Haaland and Assistant Secretary Newland visited Canada, Australia, and New Zealand to meet with officials to learn about historical Indigenous child boarding schools in these countries and subsequent redress.

In Canada, between 1870-1997, the state removed over 150,000 First Nations, Inuit, and Métis children from their families and Indigenous governments for placement in state or religious institution-run Indian residential schools.[151] In 2006, Canada enacted the Indian Residential Schools Settlement Agreement of $2 billion to formally address the Indian residential school legacy, including $100 million secured from Catholic, Presbyterian, Anglican, and United Church of Canada religious institutions and organizations.[152] The settlement, the then-largest class action settlement in Canadian legal history, included the following components:

- Establishing the Indian Residential Schools Truth and Reconciliation Commission to, in part, document and preserve survivor experiences;
- Common Experience Payment (CEP): $10,000 per survivor for the first year of attendance and $3,000 for each additional year;
- Independent Assessment Process (IAP): an extra-judicial process to resolve survivor claims up to $275,000, and potential $250,000 award for claims of income loss, for experienced sexual abuse, serious physical abuse, and other wrongful acts committed by:
    - An adult employee or another adult who was lawfully on the premises;
    - One student against another where staff knew or should have known about the abuse, or, in serious sexual abuse cases, where reasonable supervision standards were not in place; or
    - An adult employee or adult lawfully on the premises where the abuse caused serious psychological consequences for the claimant per the IAP;

[149] U.S. Const. art. I, §§ 2, 8; Commonwealth of Australia Constitution Act, 1900; Treaty of Waitangi, 1840; Mabo v. Queensland (No 2) (1992) 175 CLR 1; Mabo v. Queensland (No 1) (1988) 166 CLR 186; Johnson v. M'Intosh, 21 U.S. 543, 558 (1823); Treaty of Waitangi Act 1975; Indian Act of 1876, R.S.C., 1985, c. I-5.
[150] National Records and Archives Service, General Services Administration, Ratified Indian Treaties 1722-1869, at 1 (1973).
[151] Truth and Reconciliation Commission of Canada, Canada's Residential Schools: History, Part 1 Origins to 1939, 4 (McGill-Queen's Un. Press 2015).
[152] Indian Residential Schools Settlement Agreement (2006).

- $125 million for individual and community-based healing programming for physical, sexual, mental, cultural, and religious abuses in the Indian residential school system, including intergenerational impacts; and
- $20 million for commemoration projects.[153]

From 2019-2023, Canada provided $232.1 million for marked and unmarked burial site research and activities, including for location or GPR services, documentation, memorialization, and repatriation of Indian child human remains.[154] In 2021, to strengthen existing medical funding, Canada added $107.3 million for providing mental health, culture, and emotional services to Indian residential school survivors to support intergenerational trauma recovery.[155] Canada provided $100.1 million to aid First Nation, Inuit, and Métis management of on-reserve former Indian residential school infrastructure including for building demolition, land remediation, or new facility construction for community-based activities.[156]

Canada addressed the Indian residential day school system through settlements with First Nation, Inuit, and Métis children that experienced Indian day schools or residential schools but did not board overnight *and* Tribes that were part of the class action. This includes for children that "suffered abuse or harm from teaching staff, officials, students and other third parties at the school" *or* for the "common experience" of attendance.[157]

- ***McLean v. Canada*** **Settlement:**
  - $1.27 billion, at $10,000 per survivor; and
  - $200 million to support "commemoration, wellness/healing, and the restoration and preservation of Indigenous languages and culture" for the benefit of the survivor and descendant classes.[158]
- ***Gottfriedson v. Canada*** **Settlement:**
  - $10,000 per survivor, not a part of the *McLean* Settlement, *with no total cap*, that did not necessarily suffer abuse or harm but had the "common experience"; and
  - $50 million towards the creation of the Day Scholars Revitalization Society, "an Indigenous-led organization to support healing, wellness, education, language,

[153] Id.
[154] Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), Residential Schools Missing Children Community Support Fund (2023).
[155] Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), Government of Canada supports Indigenous communities across the country to address the ongoing legacy of residential schools (2022).
[156] Id.
[157] Gottfriedson v. Canada, 2021 FC 988; McLean v Canada, 2019 FC 1075.
[158] McLean v Canada Settlement Agreement, T-2169-16.

culture, heritage and commemoration for the benefit of the Survivor and Descendant classes."[159]

- $2.8 billion to the 325 class Indian bands for loss of language and culture:
  - An initial $200,000 to advance Indigenous languages; revival and protection of Indigenous cultures; protection and promotion of heritage; and wellness for Indigenous communities and their members; and
  - $325 million trust, with each band receiving a share of annual investment income.[160]

Moreover, the "Sixties Scoop" refers to the practice in Canada between the late 1950's through early 1990's "of removing large numbers of Indian children from their families and communities and placing them in the care of non-indigenous foster or adoptive families."[161] "Indian children who were victims of the Sixties Scoop lost their cultural identity and suffered psychologically, emotionally, spiritually and physically."[162] "They were also deprived of their status, their aboriginal and treaty rights and monetary benefits to which they were entitled pursuant to the *Indian Act*, RSC 1985, c I-5 and related legislation and policies."[163]

By the 1970s, approximately one third of all children in state care were First Nation, Inuit, and Métis children with approximately 70 percent of them placed with white families.[164] In the 2018 *Riddle* Settlement, Canada for $800 million settled with a now-adult First Nation, Inuit, and Métis class that experienced state foster care and adoption removal during the Sixties Scoop for legal damages for "loss of cultural identity."[165] Per the agreement, each qualified claimant receives a one-time $25,000 compensation and Canada directed $50 million to reunification and holistic wellness services for class members.[166]

Today, First Nation, Inuit, and Métis children represent 7.7 percent of the child population but 52.2 percent of children in foster care.[167] In 2007, several First Nations brought the *Moushoom* and *Trout* class action suits against Canada for chronic

[159] Gottfriedson v. Canada Settlement Agreement, T-1542-12.
[160] Gottfriedson v. Canada, 2023 FC 327.
[161] Sixties Scoop Settlement Agreement (2017).
[162] Id.
[163] Id.
[164] Sinclair, Raven. "Identity lost and found: Lessons from the sixties scoop." First Peoples Child and Family Review. 3(1), 2007: 66; Fournier and Crey; Johnston, Patrick. Native Children and the Child Welfare System. Toronto: James Lorimer and the Canadian Council on Social Development, 1983.23.
[165] Brown v. Canada 2018 ONSC 3429; Riddle v. Canada, 2018 FC 641.
[166] Id.
[167] First Nations Child and Family Services, Indigenous Services Canada (ISC), Government of Canada (2023).

underfunding of and discrimination in the child welfare system against First Nations children. The cases were consolidated with plaintiffs advancing two main claims:

1. "Canada chronically underfunded the [First Nations Child & Family Services (FNCFS)] program on reserves and in the Yukon, and operated it in a discriminatory manner, which *systemically incentivized* the removal of First Nations children from their families, communities and cultures; and[168]
2. "Canada failed to provide non-discriminatory access to essential health and social services…"[169]

For the first claim, plaintiffs raised the issue in the Indian residential school system and predatory foster care and adoption practice timeline:

> [The] underfunding persisted despite: (a) the heightened need for such services on reserve due to the inter-generational trauma inflicted on First Nations people by the legacy of the Indian residential schools and the Sixties Scoop; and (b) Canada's knowledge of the deficiencies in the FNCFS program based on numerous governmental and independent reports detailing these significant deficiencies, the inequities in the FNCFS program and their harmful impacts on First Nations people.
>
> [The] incentive to remove First Nations children from their homes has caused traumatic and enduring consequences for First Nations children (including the Representative Plaintiffs), many of whom already suffer the effects of trauma inflicted by Canada on their parents, grandparents and ancestors by Indian residential schools and the Sixties Scoop.[170]

In December 2023, Canada settled the consolidated *Moushoom* and *Trout* cases for $43.34 billion.[171] The settlement includes:

- **$23.34 billion:** to compensate First Nations children and families harmed by discriminatory underfunding of the First Nations Child and Family Services (FNCFS) program and those impacted by Canada's failure to provide non-discriminatory access to essential health and social services.[172]

[168] Moushoom v. Canada (Attorney General), [4], 2023 FC 1533 (emphasis added).
[169] Id.
[170] Id. at 7, 8.
[171] Id.
[172] Id.

- **$20 billion:** to long-term reform the First Nations Child and Family Services system including, but not limited to: increasing funding for culturally appropriate prevention activities based on the best interests of the child; support for young First Nations adults aging out of the child welfare system and formerly in care up to their 26th birthday or a greater age if specified in provincial or Yukon legislation; increasing housing on reserves per the needs of First Nations children.[173]

Canada formed a trust with the $43.34 billion settlement funds to run independent from the Federal government.[174]

During the *Moushoom* and *Trout* class action litigation, Canada in 2019 enacted Bill C-92 (An Act Respecting First Nations, Inuit and Métis Children, Youth and Families).[175]

Among other provisions, Bill C-92 affirms the rights of First Nation, Inuit, and Métis governments to exercise jurisdiction over child and family services; establishes the best interests of the child standard which includes cultural continuity; requires notice, confirms the right of the parent(s) and Tribal government to "make representations"; establishes placement preferences, and confirms that if there is a discrepancy between a tribal and Federal (other than sections 10-15) or provincial law, the tribal law will prevail to the extent of the conflict.[176]

Quebec, Alberta, Manitoba, and the Northwest Territories subsequently filed suit against Canada, *Attorney General of Québec v. Attorney General of Canada*, arguing Bill C-92 is unconstitutional, infringing on provincial jurisdiction as the law provides that Indigenous governments possess the right to manage their own child and family services and where provincial law conflicts with tribal law, tribal law governs. In February 2024, the Supreme Court of Canada unanimously decided the law was constitutional, recognizing rights already protected by the Aboriginal rights section of Canada's Constitution.[177]

In Australia, between 1910-1970, the state removed 1 in 3 Aboriginal and Torres Strait Islander children from their families and Indigenous communities across the now-called Commonwealth territories that include the Northern Territory, Australian Capital Territory, and Jervis Bay for placement in state or "mission" (religious institution or organization-run) dormitories or with white families.[178] Aboriginal and Torres Strait Islander people who, as children, were removed are referred to as the "Stolen

[173] Government of Canada, Assembly of First Nations, First Nations Child and Family Caring Society, Chiefs of Ontario, Nishnawbe Aski Nation, The Agreement-in-Principle on Long-Term Reform of the First Nations Child and Family Services (FNCFS) Program and Jordan's Principle (2023).
[174] Id.
[175] Parliament of Canada, Bill C-92 (Royal Assent) (2019).
[176] Id. at 8, 9(1), (2), 10, 12(1), 14(1), 16, 18(1), 22(1), (3).
[177] Attorney General of Québec v. Canada (SCC 40061) [Bill C-92 Reference].
[178] Parliament of Australia, Apology to Australias Indigenous Peoples (2008).

Generations."[179] "Many experienced neglect, physical and sexual abuse, exploitative labor, and were denied contact with their families and communities."[180] By the mid-1930s, more than half of Aboriginal children in the Northern Territory were housed in state-run institutions.[181]

In 1995-7, Australia established the National Inquiry to receive testimony and report on Aboriginal and Torres Strait Islander child removal practices and reparation options.[182] In 2018, Australia separately delivered the National Redress Scheme to provide sexual abuse survivors, while in government or non-government institutions, including those of the Catholic Church, counseling access, a direct personal response, and a redress payment up to $150,000.[183] Aboriginal and Strait Torres people who experienced sexual abuse as children in dormitory or mission schools may secure support through this mechanism.[184]

In 2021, Australia delivered a $378.6 million redress scheme for living Stolen Generations members who were removed from their families in the Northern Territory and the Australian Capital Territory prior to self-government and the Jervis Bay Territory.[185]

The scheme provides:

- A one-time payment of $75,000 in recognition of the harm caused by forced removal;
- A one-time assistance payment of $7,000 to facilitate individual-specific healing; and
- The opportunity, if elected, for each survivor to confidentially tell their experience about removal impact to a senior official and receive acknowledgement and a face-to-face or written apology for their removal and resulting trauma.[186]

Several states of Australia have delivered additional redress schemes for removal including:

[179] Id.
[180] Commonwealth of Australia, Australian Human Rights Commission, Bringing them Home: National Inquiry into the Separation of Aboriginal and Torres Strait Islander Children from Their Families (1997).
[181] Robert Manne, "Aboriginal Child Removal and the Question of Genocide, 1900-1940, in A. Dirk Moses (ed). Genocide and Settler Society. New York: Berghahn Books: 217, 227 (2004).
[182] Commonwealth of Australia, Australian Human Rights Commission, Bringing them Home: National Inquiry into the Separation of Aboriginal and Torres Strait Islander Children from Their Families (1997).
[183] Commonwealth of Australia, National Redress Scheme for Institutional Child Sexual Abuse Act (2018).
[184] Id.
[185] Parliament of Australia, Territories Stolen Generations Redress Scheme (2021).
[186] Id.

- **Victoria** (2022), $155 million.[187] The package is open to individuals "who were removed by a *government or non-government agency* in Victoria prior to the 31 December 1976."[188] Qualified individuals receive $100,000, a personal apology from the Victorian Government, access to healing and reconnection to national programs, and an opportunity to share their experience.[189]

- **New South Wales** (2016), $73 million.[190] The package is open to individuals "*removed by, committed to, or otherwise came into the care of* the New South Wales Aborigines Protection or Welfare Boards under the Aborigines Protection Act 1909, up until the Act was repealed on 2 June 1969."[191] Qualified individuals receive $75,000, a personal apology from the New South Wales Government, and $7,000 to support funeral costs. [192]

- **South Australia** (2015), $11 million.[193] The package was open to individuals removed in Southern Australia or by Southern Australian authorities prior to the 21 December 1975.[194] Qualified individuals received $30,000.[195] South Australia used approximately $2 million to support community healing projects.[196]

- **Tasmania** (2006), $5 million.[197] The package was open to individuals removed and in state custody for at minimum 12 months and prior to 31 December 1975.[198] Qualified individuals received $58,333.33 and descendants of decedent qualified individuals received $5,000 not to exceed $20,000 per family.[199]

Aboriginal and Torres Strait Islander children today represent 6 percent of the child population but 56.8 percent of children in foster care.[200]

In 1984, Australia, through the Community and Disability Services Ministerial Advisory Council, adopted the policy of the Aboriginal and Torres Strait Islander Child

[187] Victorian Government, Stolen Generations Reparations Package (2022).
[188] Id. (emphasis added).
[189] Id.
[190] Government of New South Wales, New South Wales Stolen Generations Reparations Scheme and Funeral Assistance Fund (2016).
[191] Id. (emphasis added).
[192] Id.
[193] Government of South Australia, Stolen Generations Reparations Scheme (2015).
[194] Id.
[195] Id.
[196] Id.
[197] Tasmanian Government, Stolen Generations of Aboriginal Children Act 2006 (2006).
[198] Id.
[199] Id.
[200] Commonwealth of Australia, Proportion of children in out-of-home care (0-17 years old) that are Aboriginal and Torres Strait Islander, Closing the Gap Information Repository (2023).

Placement Principle for states and territories to implement.[201] The principle in policy and practice reduces over-representation of Aboriginal and Torres Strait Islander children in child protection and out-of-home care systems by keeping Aboriginal and Torres Strait Islander children connected to their family, community, culture, and Australia.[202] The various state and territory laws implement and include, but are not limited to, the following: establishing the best interests of the child standard; creating placement preferences or "hierarchy" for *all* out of home care placements, and cultural support plans for last-result non-Indigenous placements; utilizing comprehensive health and social services to support the child's (or children's) parent(s) to maintain in-home care; and requiring reunification or "restoration" as the end-goal of a child welfare case.[203] Notably, if a child is not placed with their extended Aboriginal and Torres Strait Islander family, the placement must be within "close geographic proximity" to the child's family."[204]

In Australia, "[a]ll jurisdictions have adopted the Aboriginal and Torres Strait Islander child placement principle in legislation and policy."[205]

In New Zealand, the Church Missionary Society from Great Britain established the first boarding school for Māori children for Christianization.[206] Following the New Zealand Wars, the state enacted the Native Schools Act 1867 to create a national system of state-operated or state-funded and religious institution-operated boarding schools with Māori Tribes required to donate the land for the schools and contribute to infrastructure and staff costs.[207] In 1894, the state made Māori child boarding school attendance compulsory.[208] In 1969, New Zealand transferred national control of the system to regional education boards.[209]

In 1975, the Crown established The Waitangi Tribunal to assess claims of the Crown breaching the Treaty of Waitangi from 1840-present and enter into direct Crown negotiations.[210] As of 2024, the Crown signed 100 settled deeds. There are approximately

[201] Formerly the Council of Social Welfare Ministers; Australian Institute of Family Studies, Resource Number 8 (2005); Lock, J., Foster Care: What is the Aboriginal and Torres Strait Islander Child Placement Principle (1997).
[202] Commonwealth of Australia, Australian Institute of Health and Welfare, The Aboriginal and Torres Strait Islander Child Placement Principle indicators (2023).
[203] Id.
[204] Commonwealth of Australia, Productivity Commission, Report on Government Services 2023, 16 Child protection services (2023).
[205] Id.
[206] John Butler to Secretary of Sydney Correspondence Committee, 6 Nov. 1814, Mission Books 1820-1822, CN/M1 Microfilm, AU.
[207] Native Schools Act 1867 (31 VICT 1867 No 41).
[208] School Attendance Act 1894 (58 VICT 1894 No 26).
[209] Education Amendment Act 1968 (1968 No 11).
[210] Treaty of Waitangi Act 1975, section 5 (1975 No 114).

50 remaining settlements.[211] Queen Elizabeth II herself signed the 1995 Act effectuating the Waikato-Tainui Claim Settlement.[212]

The approximate total settlement amount is NZD $2.74 billion, with most settlements including an official apology, financial award, territory-return, water rights, fishery rights, and mineral rights return, and cultural redress like restoring place names in the Māori language.[213]

In 1989, following ICWA implementation in the U.S., New Zealand enacted the Oranga Tamariki Act (Children's and Young People's Well-being Act) to prevent contemporary and future unwarranted Indigenous child removal.[214] Among other provisions, the law establishes the best interests of the child standard and requires kinship care and placement preferences (whānau, hapū, iwi, or family group) for when an Indigenous child must be removed from the home.[215] In 2019, New Zealand revised the Oranga Tamariki Act regulations that affirmed kinship care, placement preferences, support to establish, maintain, and improve whānau connections, and separate reporting information or results for Māori children and young people on regulation compliance.[216]

On July 25, 2022, His Holiness Pope Francis of the Holy See officially apologized on behalf of the Holy Roman Catholic Church for its participation in Canada's Indian residential school policies. His Holiness Pope Francis stated:

> I ask forgiveness, in particular, for the ways in which many members of the Church and of religious communities cooperated, not least through their indifference, in projects of cultural destruction and forced assimilation promoted by the governments of that time, which culminated in the system of residential schools … What our Christian faith tells us is that this was a disastrous error, incompatible with the Gospel of Jesus Christ. It is painful to think of how the firm soil of values, language and culture that made up the authentic identity of your peoples was eroded, and that you have continued to pay the price of this. In the face of this deplorable evil, the Church kneels before God and implores his forgiveness for the sins of her children (cf. JOHN PAUL II, Bull Incarnationis Mysterium [29 November 1998), 11: AAS 91 [1999], 140). I myself wish to reaffirm this, with shame and

[211] New Zealand Ministry of Justice, Waitangi Tribunal (2023).
[212] Waikato Raupatu Claims Settlement Act 1995 (1995 No 58).
[213] New Zealand Ministry of Justice, Waitangi Tribunal (2023).
[214] New Zealand Parliamentary, Children, Young Persons, and Their Families (Oranga Tamariki) Legislation Act 2017 (2017 No 31).
[215] Id.
[216] New Zealand Parliamentary, Oranga Tamariki Legislation Act 2019 (2019 No 30).

> unambiguously. I humbly beg forgiveness for the evil committed by so many Christians against the indigenous peoples.[217]

And on March 30, 2023, His Holiness Pope Francis of the Holy See officially renounced The Doctrine of Discovery, signaling repudiation of the Papal Bulls authorizing Catholic countries in Europe to conquer non-Christians and seize their territories.[218]

To date, the U.S. Government is unaware of any support by the United States Conference of Catholic Bishops for His Holiness Pope Francis to officially apologize on behalf of the Holy Roman Catholic Church for its participation in U.S. Federal Indian boarding school policies. On June 14, 2024, the United States Conference of Catholic Bishops approved by vote (181-2) "Keeping Christ's Sacred Promise: A Pastoral Framework for Indigenous Ministry," issuing a formal apology for the Catholic Church's role in the U.S. of inflicting a "history of trauma" to Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community and affirmed its official repudiation of The Doctrine of Discovery.[219] The Conference noted:

> The Indian boarding school 'system itself left a legacy of community and individual trauma that broke down family and support systems among Indigenous communities. These multigenerational traumas continue to have an impact today, one that is perpetuated by racism and neglect of all kinds… Many Indigenous people feel unaccepted by and unwelcomed in society and even the Church. Further, Indigenous peoples still suffer disrespect and neglect within the larger U.S. society.'[220]

The Conference also provided a series of recommendations to confront the following issues in Indian Country and the Native Hawaiian Community: Natural Resources; Housing and Access to Financing; Education; Health Care; Racism; and Concerns of Urban Natives.[221]

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[217] The Holy See, Apostolic Journey of His Holiness Pope Francis to Canada: Meeting with Indigenous Peoples: First Nations, Métis and Inuit (2022).
[218] The Holy See, Joint Statement of the Dicasteries for Culture and Education and for Promoting Integral Human Development on the "Doctrine of Discovery" (2023).
[219] United States Conference of Catholic Bishops, Keeping Christ's Sacred Promise: A Pastoral Framework for Indigenous Ministry," 5, 6, 7 (2024).
[220] Id. at 10.
[221] Id. at 33.

"We are here with the desire to pursue together a journey of healing and reconciliation that, with the help of the Creator, can help us shed light on what happened and move beyond the dark past."

- His Holiness Pope Francis

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14. The Road to Healing and Oral History Project

"I believe we are born with an obligation. We're not just people here on this earth taking up space, we have an obligation to honor the legacy of our ancestors, so they didn't starve in vain, so they didn't die in vain, so they weren't ripped away from their mother's arms in vain. It's our obligation to help people, to honor our earth, and protect our environment for future generations. We know that things don't die when we die. We're not here to use up as much as we can and then who cares about our children and grandchildren. That's not who we are as people."

- Secretary Haaland at The Road to Healing Southern California

[223]

As part of the Federal Indian Boarding School Initiative, and in response to Assistant Secretary Newland's Vol. I recommendations, Secretary Haaland launched "The Road to Healing," a tour across the country to hear directly from survivors about their experiences in the Federal Indian boarding school system. As part of The Road to Healing, Secretary Haaland, Assistant Secretary Newland, and other U.S. officials, visited the following 12 areas:

[222] Pope Francis, Address, Meeting with Young People and Elders at a Primary School in Iqaluit, July 29, 2022.
[223] Southern California Transcript, 129 edited for clarity.

- Riverside Indian School, Oklahoma (7/9/2022).
- Little Traverse Bay Bands of Odawa Indians, Michigan (8/13/2022).
- Rosebud Sioux Tribe, South Dakota (10/15/2022).
- Gila River Indian Community, Arizona (1/20/2023).
- Navajo Nation, New Mexico, Arizona, Utah (1/22/2023).
- Tulalip Indian Tribes, Washington (4/23/2023).
- Mille Lacs Band of Ojibwe, Minnesota (6/3/2023).
- Sherman Indian High School, Southern California (8/4/2023).
- Federated Indians of Graton Rancheria, Northern California (8/6/2023).
- Alaska Native Heritage Center, Alaska (10/22/2023).
- Pueblo of Isleta, New Mexico (10/29/2023).
- Montana State University, Montana (11/5/2023).

The Secretary also met with members of the Native Hawaiian Community in Kailua, O‘ahu on June 26, 2023, to learn more about Native Hawaiian experiences in historical boarding schools established by religious institutions and organizations across the Hawaiian Islands.

The Road to Healing was part of the Department’s effort to create a permanent oral history collection.

During events for The Road to Healing, the Department of Health & Human Services (Indian Health Service & Substance Abuse and Mental Health Services Administration), the Alaska Native Tribal Health Consortium, and the Southcentral Foundation provided trauma-informed mental health providers or traditional healers onsite for individuals experiencing secondary trauma from telling their experiences, often for the first time.

The Road to Healing affected descendants, many of whom are learning or understanding for the first time of their parents’ or relatives’ Indian boarding school experiences. Preliminary themes from survivor and descendant experiences shared on The Road to Healing centered on intergenerational trauma, including familial secrecy, embarrassment, shame, chemical dependency, and disassociation. Survivors and descendants are also facing the general effects from Federal Indian law and policy associated with the Indian boarding school system, as U.S. society continues to confront this part of American history.

The following themes of learning emerged from hearing directly from survivors and their descendants on all 12 visits on The Road to Healing:

Physical and Mental Health Impacts

The assimilation methods used in Federal Indian boarding schools were physically all-encompassing, from the pain of being stripped and 'cleaned' upon arrival, to the erasure of Native foods, and forcing children to adapt to western dietary tastes. Survivors and descendants frequently shared the connections between experiences at Federal Indian boarding schools and the resulting impacts on physical health of children who attended. The Department heard from individuals who were able to cope and because of their coping skills, considered themselves to be very fortunate. However, survivors often acknowledged the physical toll of coping. Survivors mentioned the experience of coping with Federal Indian boarding school trauma as adults through chemical dependency, addiction, and other compounding adverse effects on health. Many survivors shared details of the painful experience of having their hair cut upon arrival at Federal Indian boarding school, physically altering their appearance. Several attendees also noted the hard physical labor involved in the system. Food was also weaponized in Indian boarding school settings, in sharp contrast to traditional Native American practices of food as medicine. Food that was seen by Federal Indian boarding school staff to be reminiscent of Native American culture was not allowed, and survivors frequently spoke of being forced to eat highly processed, unfamiliar, or spoiled food. Many also shared traumatic experiences of physical or sexual abuse or witnessing physical or sexual abuse occurring to other children.

"[T]he Anaktuvuk Pass Eskimo from Central Alaska just above us, when they came into Wrangell, I remember, they came in after we did, they had all their parka, their caribou pads, I mean, they're dressed – I remember coming in, I was so impressed about how beautiful they were. They came in, they stripped them down, put all their clothes, the food they bring in, dry caribou, salmon, and stuff like that, they put it all on the side. They made them go through the shower, shave them, give them their uniform and a number. And I know it, I think I probably cried when they took all their clothes down there and burned them in the furnace, all the beautiful, beautiful parkas and everything." [224]

- The Road to Healing Alaska Participant

"For my own grandchildren, for my great-grandchildren and I – some of the things happened in boarding school – is going to be a long time of healing and forgetting. I mean you're put in there, treated like you was some type of a hired hand. I stayed in the summers, worked in the heat, hauled brush…If we got poison ivy, we still had to go back the next day." [225]

[224] Alaska Transcript, 25.
[225] Oklahoma Transcript, 57-58.

- The Road to Healing Oklahoma Participant

"She said 'I've got a treat for you, go in the dining room and sit in there.' Now this is after a couple of years of being there. She knew one of the most torturous things to me was to give a raisin cookie … so I go in the dining room and here on the dining room table is a little saucer and a raisin cookie … It was her ultimate torture for me as she knew I hated raisins…I threw mine out in my milk carton and threw it in the garbage. I didn't realize she was watching me, but she made me dig in the garbage, get the milk carton out, dig those raisins out and put them in my mouth." [226]

- The Road to Healing Michigan Participant

"A lot of the – all of the food we ever ate when we first got there were so foreign and alien to us we couldn't eat traditional – we couldn't bring any of our traditional foods. We ate industrial Western processed foods and these huge industrials cans of salted meats and salted vegetables. There was powdered juice, powdered milk, powdered eggs. We were forced to eat all those kind of foods [sic], and of course, we all got violently ill because our bodies couldn't process changing our diet [sic] over from our traditional Native foods. And we had vomiting, we had diarrhea, we had both and we were often punished for soiling our pants or clothing or bedding and we got beaten for that."[227]

- The Road to Healing Alaska Participant

"And my grandpa was on a wagon and took our little suitcases off, my brother and I, and when we got on, I got off the wagon to go get on the bus. My grandpa's last words were, 'We're going to experience some things,' in Cheyenne. He was talking Cheyenne. We're going to probably get our haircuts, because a lot of our Cheyenne people got our haircuts. He said, 'When they go away to school,' he said, 'they get haircuts.' He said our hair is very sacred. Culturally, our hair is sacred. 'We do not cut our hair, but they're going to do that to you. You get there, your black braids are not going to come home.' And that was hard. My braids got cut off. Excuse me. Just remembering what happened to some of us first day of school." [228]

- The Road to Healing Montana Participant

"…[T]hey said 'We're going to run away and we're going to go home and when we get home, we'll send for you.' They told us 'We'll send for you girls.' So we said okay and we ran up a fire escape, which was out – on the outside of the building, we ran up there and we could see them running way over by the trees and we waved to them. They waved to us and were just really happy because they said when they get home, they're going to send for us. Well, they didn't know they were on – the school is on an island and the next

[226] Michigan Transcript, 76-78.
[227] Alaska Transcript, 16-17.
[228] Montana Transcript, 28.

morning, we went into the dining hall and they all came in. They were all wearing – their heads were shaven and they were all wearing little black and white prison suits and us girls just started crying." [229]

- The Road to Healing Alaska Participant

"My story begins in St. Patrick's Mission…When I started school, my father and mother took me by my right hand and dropped me off at St. Patrick's and the moment I landed there, they took me downstairs, took all my clothes off and threw a bunch of green stuff all over me and it stung like hell. It stung my eyes. It stung all over me, and when they put the water on me, it stung even worse. They did not care." [230]

- The Road to Healing Oklahoma Participant

"Unfortunately, Wrangell was a place that attracted pedophiles and many matrons, men and women, perpetrated themselves upon little boys and girls. And what I witnessed in the boys dorm were where matrons were sodomizing boys in their beds or in the bathrooms. We saw girls going home in the middle of the school year pregnant and a lot of these children were like 11 and 12, 13 years old." [231]

- The Road to Healing Alaska Participant

"But, you know, the sad part about it is a lot of us had to watch the priest sodomize our -- so, had to watch our classmates become sexually assaulted. So that's -- nobody wants to share things like that. I've learned how to be tough because you couldn't cry. Couldn't do that."[232]

- The Road to Healing South Dakota Participant

Generational Impacts on Families

Survivors across the United States frequently discussed the impacts of being separated from family due to Federal Indian boarding schools. They expressed how it reduced their capacity to be an affectionate parent or reestablish healthy attachments with family. Descendants of survivors across all 12 visits on The Road to Healing shared how upon discovery of their grandparents' or parents' experience at Indian boarding schools, they had new or deepened understanding of why their childhoods were more difficult and often less loving and affectionate because of the trauma that their grandparents or parents experienced in Indian boarding schools. Descendants who may have never gone to Indian boarding schools themselves shared the heavy lift of breaking generational cycles of traumatized parenting and the effort required to establish new ways of being with their own

[229] Alaska Transcript, 40-41.
[230] Oklahoma Transcript, 11.
[231] Alaska Transcript, 16.
[232] South Dakota Transcript, 100.

children and family. This frequently involved the need for professional therapy and journeys into recovery from chemical dependency, addiction, and physical, emotional, or sexual abuse. Many survivors recounted the loss of the parent-child relationship and the permanent impact to their closest familial relationships as a result of being separated from their families at a young age and for long periods of time. They described feelings of abandonment, deep sadness, and shame that they lived with at Indian boarding schools and long after.

"But I think the worst part of it was at night, listening to all the other children crying themselves to sleep, crying for their parents, and just wanting to go home. And I remember one girl was a bedwetter, and they made her scrub the entire bathroom on her hands and knees with her toothbrush."[233]

- The Road to Healing Michigan Participant

"I could just hear all – you could just hear crying. First it would just start really slow and then pretty soon, you could hear the whole dorm crying. You'd hear girls saying they want to go home. And it was true, all our clothes were taken away from us and we were given government issued clothing and…we were given numbers, you know, we weren't – we never called by our name, we were all called by our numbers. My number was 77 too because my sister was there before me and her number was 77 and then – and it was marked on everything you owned."[234]

- The Road to Healing Alaska Participant

"I would like to say my aunt said after we all left, after the planes came and we all left, she said the village was so quiet because there was no children. No children in the village."[235]

- The Road to Healing Alaska Participant

"Once I graduated, I had to go straight to the Marine Corps because I had no parents, nobody there when I finished that, and to this day, I know it affected my sister, because I haven't seen her in probably 30 years, and she's been in and out of prison ever since. She's never been back to the – to the Indian reservation, and I don't have – it created a thing where I don't have a very good relationship with my mother, because by the time we started

[233] Michigan Transcript, 149.
[234] Alaska Transcript, 39.
[235] Alaska Transcript, 38.

talking again and she – she – there's a lot of feelings that was brought up just because of separation."[236]

- The Road to Healing Northern California Participant

"I think the biggest thing of learning this experience and having my dad as a survivor is I survived my dad. And I'm really lucky that he was able to repress and repress and repress and nothing came out. He wasn't an alcoholic. He didn't do drugs. He just was so detached. He was not here. And so there are sometimes when you can see him and you literally have to just, like, trauma. Dad, come back. Come back to us. We're here right now. We're safe. Come back. Be with us right here. Feel it. We love you. And I think the biggest thing for him is that he just wasn't the parent that he wanted to be or that he could be."[237]

- The Road to Healing Montana Participant

"I experience feelings of abandonment because I think of my mother standing on that sidewalk as we were loaded into the green bus to be taken to a boarding school. And I can see it – still have the image of my mom burned in my brain and in my heart where she was crying. What does a mother think? She was helpless."[238]

- The Road to Healing Arizona Participant

"Listening to some of the stories here, I was thinking, you know, I don't remember ever getting a hug from my mom. I don't remember, ever, my mother telling me she loved me. I remember getting whipped with a switch and finally being able to go live with my father because they didn't live together anymore. And that wasn't allowed. He never did anything like that. He said, 'That's because of the schools.'"[239]

- The Road to Healing Washington Participant

"My boarding school experience at Seneca – the most traumatic thing for me was being separated from my family, from my siblings. And the years that you're separated, you never get back. The days that you're separated they don't return, but you learn to live. You learn to become part of the trauma. You don't understand it. I know many days, even now, I don't understand why I had to go through what I went through. And healing is a long entire life process."[240]

- The Road to Healing Oklahoma Participant

[236] Northern California Transcript, 70.
[237] Montana Transcript, 90.
[238] Arizona Transcript, 81.
[239] Washington Transcript, 97-98.
[240] Oklahoma Transcript, 66-67.

"The important years of bonding with your parents and getting loved and hugged on daily is vital to child health, growth, and emotional well-being. I did not get that. We didn't get that. There were no hugs, no encouragement, no praise." [241]

- The Road to Healing Michigan Participant

Economic and Militarizing Impacts to Indian Tribes

Memories of the militaristic practices of Federal Indian boarding schools were another shared experience among survivors across the country. Many participants in The Road to Healing noted the prominence of marching and vigorous cleaning assignments as part of their training at Indian boarding schools. Later entrance into U.S. Armed Services was commonly noted as easy after the experience of Indian boarding schools. Many noted the agricultural duties and manual or domestic labor that Federal Indian boarding schools emphasized over formal education, which disrupted and debilitated tribal economies. Several survivors and their descendants noted the intertribal connections that were made in Federal Indian boarding schools from meeting other children belonging to different Indian Tribes. Several shared that they met their spouses at Federal Indian boarding school. All these experiences impacted the shape, ability to self-govern, and economic well-being of Indian Tribes.

"And for those who went to boarding school, and for those who talk of their military experience serving and having gone to school at a boarding school, boot training was no match. It was very easy."[242]

- The Road to Healing Navajo Participant

"When she got here to Tulalip, she did talk of having to be marched everywhere. She talked about that bell that would ring. And I think it was in the 1980s we were brought here to a ceremony to commemorate this bell. I found Mom sitting alone by herself, and I asked her what was she thinking. She said, "Thank God it's silenced. No more will that bell ever tell me where to go, where to be." She talked of being marched all the time and marching the little children."[243]

- The Road to Healing Washington Participant

"He was born right up the road here, between White Sulfur Springs and Belt, in a tipi. And when they rounded him up, they took him to St. Paul's. He never got to go to school, he said. He never learned so much as they talk about, oh, you're going to school. No. He

[241] Michigan Transcript, 131.
[242] Navajo Transcript, 21.
[243] Washington Transcript, 36-37.

was labor. He had to take care of the garden. He had to take care of the sheep. He had to take care of the milk cows."[244]

- The Road to Healing Montana Participant

"I came through that boarding school. I was not academically prepared to succeed in higher education. The Vietnam War was going strong in the late 1960s. That's where I ended up, serving for this country. One year, day-to-day, in Vietnam."[245]

- The Road to Healing South Dakota Participant

"So I think – you know, when I think back to the things that she has taught us, the cooking and the sewing and the ironing and punctuality. Punctuality was a big thing, because she said that, you know, this lining up to go get your meal, lining up to go play outside, lining up – the constant marching … that's what she remembered."[246]

- The Road to Healing Northern California Participant

"She didn't call them boarding schools. She called them military school where she had to get up and march every single day. And as soon as she finished marching, she had to go to work. And I said, 'What did you do?' She said, 'Well, we worked in the farm, in farmyards, the animals, the cows, the chickens. We plucked the chickens. We fed them. And we took care of the goats, the cow. Cooked the bread, worked in the kitchen, cleaned the halls, did all the work. And the boys did blacksmith and other things like that.'"[247]

- The Road to Healing Washington Participant

"When I came back home from Vietnam, I was doing the same thing you're doing today, and I went around because I wanted to find out all the bad about Sherman Indian School. And, you know, I talked to my mother about it.… And I got back home to my mother. I said, 'They don't want to talk to me about it.' And she said, 'That's because you're asking them to say bad things about the school.' She says, 'You got to remember, this is the only thing that they had. You know, it meant a lot to them…This is what they had. This is what they shared together and the friendship and what it represented; a lot of them met their spouses here.' I have an aunt that was from Hualapai, I have two uncles from Pomo, you know, because they met here."[248]

- The Road to Healing Southern California Participant

Impacts on Indian Languages, Cultures, and Religions

[244] Montana Transcript, 108.
[245] South Dakota Transcript, 88.
[246] Northern California Transcript, 121.
[247] Washington Transcript, 128.
[248] Southern California Transcript, 29-30.

One of the most prominent shared experiences of survivors across the country was the grief and trauma that resulted from Native languages loss from the Federal Indian boarding school system. The punishments for speaking Native languages instead of English, even when children could not understand or speak English, commonly involved their mouths being washed with lye soap or varying types of corporal punishment that ranged in severity. Many survivors of Federal Indian boarding schools were so traumatized from these punishments that they would not allow future generations to learn the language, even long after experiencing the Federal Indian boarding school. Secretary Haaland regularly shared that this mirrored her family experience. Descendants described the impact on them. In addition to the loss of Native languages, the loss of cultural practices and ceremonies was a frequent topic among both survivors and their descendants. The dominance of Western religious practices and the punishing indoctrination that occurred in Federal Indian boarding schools sought to instill a sense of inner badness, shame, inferiority, and doom in children. Survivors and descendants who participated in The Road to Healing shared that recovering from these spiritual wounds often proved to be a lifelong and difficult task for those who survived. Participants commonly described methods of psychological abuse employed by Federal Indian boarding school staff, which impacted some survivors to this day.

"I had been there for a few weeks and wanted to go home. I said to Sister Naomi, I think I'm going to go home now. She leaned way over into my face and said, 'You're not going anywhere, you're going to be here for a long, long time. So, I choked back my tears and I hide inside myself."[249]

- The Road to Healing Michigan Participant

"I think, one of the things that we look at is the priests and the nuns, you know, who tell you that you'll burn in hell, you know. 'If you lie, you're going to burn in hell'; or, 'If you steal, you're going to burn in hell.' And you hear that all the time…"[250]

- The Road to Healing South Dakota Participant

"To this day I can still see that nun standing and she said, 'Here,' she gave me a bag and I said, 'Oh, what is it?' 'Oh, it's from your brother.' 'Oh, is he here?' 'No, he's dead.' I could still see her standing there and I was still a little girl. And I thanked her."[251]

- The Road to Healing Minnesota Participant

"The nuns: They taught – they looked the other way, because this is – it wasn't just physical; it was psychological torture. It was warfare against Indian children. So the

[249] Michigan Transcript, 127-128.
[250] South Dakota Transcript, 103.
[251] Minnesota Transcript, 40.

littler children, when they got bigger, they could beat up little children for crying, and the nuns looked the other way. That was part of their strategy."[252]

- The Road to Healing South Dakota Participant

"At night, they would come and hover over both of us and shine their flashlights on us. I don't know why. Just to scare us, I guess. Because the dorms, the lights were off. We turned off all the lights, and they did that every once in a while, pulled the sheets off and shined the flashlight on us. And if we weren't good, if you were messing around when the lights were off, they would take us and punish us and put us in the basement. And the lights were all off in the basement, and we'd have to sit on the steps. The line of light for the door is we would sit right there by it because we were afraid of the dark, and sometimes they would forget about us and they wouldn't – sometimes they would forget that they had put us down in the basement. Wouldn't get out of there until early morning, and it was – maybe that's why I'm afraid of the dark now. I don't know. I leave the light on in my bedroom. Even today. That was a – that was hurt – hard for me. I still think about those nights when I had to sit in the basement. I was afraid of the dark. And I survived there for – the dorms for six years."[253]

- The Road to Healing Montana Participant

"My sister talked about being put in the closet with the mops and the brooms. And, to this day, she can't sleep without a light on. She could be deep in her sleep, and as soon as somebody turns off the bathroom light, she wakes up screaming. And she's a grandmother today. She doesn't know where this comes from."[254]

- The Road to Healing Washington Participant

"Little girls, from Parcel Post, they got these shoes. They had bows on them, like sandals. They'd all wear them. I had to wear those shoes for two weeks. Psychological punishment, you know, because I was ridiculed, you know; made fun of."[255]

- The Road to Healing South Dakota Participant

"I was in boarding school and I was told I wouldn't make a good mother. And I would tell God when I have children I will love them and care for them. And treat them like a person, because in boarding school you're not a person. You're not even a human being."[256]

- The Road to Healing Minnesota Participant

[252] South Dakota Transcript, 64.
[253] Montana Transcript, 48-50.
[254] Washington Transcript, 116.
[255] South Dakota Transcript, 68.
[256] Minnesota Transcript, 39.

"It took me 40 years to put my feet back on the ground and stop believing in Christ and the Lord and the Holy Spirit and all of these kind of things that they tried to pound into me in boarding school. But I had to go back to my Sun Dance and sweat lodge and my elders telling me what I needed to know about the higher power. And without that, I think I would have had – I would probably still be drunk."[257]

- The Road to Healing Montana Participant

 [258]

The Oral History Project

The Department announced, in September of 2023, the launch of an oral history project that will document and make accessible the experiences of the generations of Indigenous children who attended the Federal Indian boarding school system. This first-time effort to gather Indian boarding school survivor experiences – by the U.S. Government

[257] Montana Transcript, 17.
[258] Parrell, W. (2024). [Photograph of totem in Anchorage, Alaska that was raised to honor Federal Indian boarding school survivors and descendants]. U.S. Department of the Interior Museum (Research Files), Washington D.C.

– will ensure that experiences that survivors share can be heard, and learned from, by current and future generations. The National Native American Boarding School Healing Coalition, which has a record of collecting experiences through a survivor-centered protocol, will receive a total of $3.7 million in grant funding to help facilitate this project. Funding for the grant through the Bureau of Indian Affairs was made possible in part through funding from the National Endowment for the Humanities and the Andrew W. Mellon Foundation. Key deliverables are related to specified supports to protect participating survivors, requiring an outline and plan for cultural protocols, trauma-informed mental health support, spiritual protocols, and onsite therapeutic activities to be in place before, during, and after oral history narratives are gathered.

This project will focus on gathering first-person survivor narratives and establishing an oral history collection. Survivors will have the opportunity to make their interviews available to Federal partners, Tribal governments, policymakers and researchers, and the public. The Department will continue its engagement with the Department of Health and Human Services, including the Indian Health Service and the Substance Abuse and Mental Health Services Administration, to coordinate trauma-informed survivor-centered support.



[259]

[259] Photograph No. 313189990; "School Band" (Haskell Institute); Exhibit Prints Related to Various Jurisdictions, Tribes, Indian Schools and Activities, 1904-1936; Records of the Bureau of Indian Affairs, Record Group 75; National Archives at College Park, College Park, MD.

15. List of Information Resources

The List of Information Resources is a collection of sources of information related to the Federal Indian boarding school system. The list includes Federal Government repositories, Federal reports, non-Federal archives, museums, and historical society repositories, books, journal articles, theses papers, newspapers, magazines, newsletters, and organizations.

In the List of Information Resources, the sections related to repositories and reports include a general description, a description of the type of information stored or available at that resource, and a link if available. The sections on publications and organizations are organized alphabetically, by author if applicable.

The Department is providing this information to expand family reunification and survivor and descendant support, scientific and scholarly analysis, and understanding across the United States and world of the Federal Indian boarding school system.



[260]

[260] Photograph on pp. 7-8. "Pictures of Pup7ils 822.7", Record ID 075-02-0791-0025-0036, Box Identifier 83051, File Identifier 3460098, American Indian Records Repository (AIRR). Notation on p. 8, "Otto Lomavito + children unloading truck Poston #2 9-1-45 4pm" and is stamped "Please give credit for this photograph as follows: Milton Snow [illegible]". P. 8 also has a handwritten notation as follows: "HP1-133".

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16. Federal Indian Boarding School Initiative Findings and Conclusions

The Assistant Secretary's findings of the Federal Indian Boarding School Initiative investigation, based on examination of U.S. Government records, include the following:

1. The Federal Indian boarding system was expansive, consisting of 417 Federal Indian boarding schools, comprised of 451 specific sites, across 37 states or then-territories, including 22 schools in Alaska and 7 schools in Hawai‘i.

2. Multiple generations of American Indian, Alaska Native, and Native Hawaiian children were induced or compelled by the U.S. Government to experience the Federal Indian boarding school system, given their political and legal status as Indians and Native Hawaiians. At least 18,624 Indian children entered the Federal Indian boarding school system between 1819 and 1969. This information is not complete and does not count children who: attended a Federal Indian boarding school outside 1819-1969, may be listed as an attendee on records not available to the Department including those of religious institutions and organizations, or may be listed as an attendee of an Other Institution including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support.

3. The Federal Indian boarding school system includes burial sites of Indian children who died while institutionalized. There are 74 marked or unmarked burial sites at 65 different schools across the Federal Indian boarding school system based on available records. This information is not complete and does not include burial sites that may be: associated with Federal Indian boarding schools in operation outside the period 1819-1969; listed on records not available to the Department including those of religious institutions and organizations, or associated with Other Institutions including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organizations that received no U.S. Government support.

4. The twin Federal policy of Indian territorial dispossession and Indian assimilation through Indian education extended beyond the Federal Indian boarding school system, including an identified 1,025 other institutions across 1,027 total sites, including Indian day schools, sanitariums, asylums, orphanages, stand-alone dormitories, and Indian boarding schools operated by religious institutions and organization that received no U.S. Government support.

5. Congress made appropriations available of more than an estimated $23.3 billion in FY23 inflation-adjusted dollars between 1871 and 1969 for the Federal Indian boarding school system as well as for similar institutions and associated assimilation policies. This amount does not include the present-day value of Indian territory loss associated with the Federal Indian boarding school system, any funds that may have been obtained from Tribal trust accounts for the benefit of Indians and maintained by the United States, or funds expended by other institutions including religious institutions and organizations for Indian boarding school operation.

6. Through public-private partnerships, at least 59 religious institutions and organizations received U.S. Government support to operate or support schools in the Federal Indian boarding school system. Religious institutions or organizations operated 210 of 417 Federal Indian boarding schools. This number does not include Indian boarding schools operated by religious institutions and organizations that did not receive U.S. Government support.

7. A priority of U.S.-Indian relations is Indian education, a treaty right, demonstrated by the 171 Treaties that the U.S. entered into with Indian Tribes and ratified by the Senate that implicate the Federal Indian boarding school system or education generally.

8. The Federal Indian boarding school system deployed militarized and identity-alteration methods to assimilate American Indian, Alaska Native, and Native Hawaiian people—primarily children—through education.

9. The Federal Indian boarding school system predominately used the manual labor of American Indian, Alaska Native, and Native Hawaiian children to compensate for the poor conditions of school facilities and lack of financial support from the U.S. Government.

10. The Federal Indian boarding school system discouraged or prevented the use of American Indian, Alaska Native, and Native Hawaiian languages or cultural or religious practices through punishment, including corporal punishment.

11. Tribal preferences for the possible disinterment or repatriation of remains of children discovered in marked or unmarked burial sites across the Federal Indian boarding school system vary widely. Depending on the religious and cultural practices of an Indian Tribe, Alaska Native Village, or Native Hawaiian Community, it may prefer to disinter or repatriate any remains of a child discovered across the Federal Indian boarding school system for return to the child's home territory or to leave the child's remains undisturbed in its current burial site. Moreover, some burial sites contain human remains or parts of remains of multiple

individuals or human remains that were relocated from other burial sites, thereby preventing Tribal and individual identification.

12. The U.S. Government has not commemorated or memorialized Indian children who experienced the Federal Indian boarding school system.

Based on the findings of the Federal Indian Boarding School Initiative, the Assistant Secretary concludes that:

1. The United States' creation of the Federal Indian boarding school system was part of a broader policy aimed at acquiring collective territories from Indian Tribes, Alaska Natives, and the Native Hawaiian Kingdom and lands from individuals therein. From the earliest days of the Republic, the United States' official objective—based on Federal and other records—was to sever the cultural and economic connection between Indian Tribes, Alaska Native Villages, the Native Hawaiian Kingdom, and their territories. The assimilation of Indian children through the Federal Indian boarding school system was intentional and part of that broader goal of Indian territorial dispossession for the expansion of the United States.

2. Assimilation of American Indian, Alaska Native, and Native Hawaiian people eventually became an objective of Federal policy in and of itself. The Federal Indian boarding school policies targeted Indian children as one method to accomplish this objective.

3. The intentional targeting, removal, and confinement of American Indian, Alaska Native, and Native Hawaiian children to achieve the goal of forced assimilation of Indian people was both traumatic and violent. In addition to the removals, deaths of Indian children while under the care of the U.S. Government, or U.S. Government-supported institutions, led to the breakup of Indian families and the erosion of Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community.

4. Many more Indian children who survived the Federal Indian boarding school system live(d) with their experiences from the school(s). Moreover, several generations of Indian children experienced the Federal Indian boarding school system. The Federal Indian boarding school system directly disrupted Indian families, Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community for nearly two centuries, with many continuing effects that are present today.

5. Further review is required to determine the reach and impact of the violence and trauma inflicted on Indian children through the Federal Indian boarding school system. The Department has recognized that targeting Indian children for the Federal policy of Indian assimilation contributed to the loss of: (1) life; (2) physical

and mental health; (3) territories and wealth; (4) Tribal and family relations; and (5) use of Tribal languages. This policy also caused the erosion of Tribal religious and cultural practices for Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community, and over many generations.

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17. Recommendations of the Assistant Secretary for Indian Affairs

The Federal Indian Boarding School Initiative Investigation estimates that the U.S. Government made appropriations available of more than $23.3 billion in FY23 inflation-adjusted dollars between 1871 and 1969 for the Federal Indian boarding school system as well as other similar institutions and associated assimilation policies.

"An apology is needed. An apology from the U.S. Government, but also, to take it a step further, to understand and learn the true history of this place that we call home; the bad things that have happened to us, but also to understand the light that came from the

[261] Photograph No. 40571897; "Drafting" (Flandreau School and Agency); Photographs, 1936-1954; Records of the Bureau of Indian Affairs, Record Group 75; National Archives at Kansas City, Kansas City, MO.

people that had to face, you know, the fires of hatred and the burning of their skin because they're speaking their language, you know, that we still are here today."[262]

- The Road to Healing Washington Participant

"I think the U.S. Government should fund treatment centers on every reservation. Because treatment centers are part of our justice in cleaning up the mess that was caused by the trauma of boarding schools." [263]

- The Road to Healing Montana Participant

"The most important bond in the world, between a child and a mother, was destroyed by boarding school abuse and memories that she shared with thousands of Native children across Turtle Island, children who did not witness healthy parenting, lost forever, which is affecting our communities."[264]

- The Road to Healing South Dakota Participant

"We are making difficult choices today that will affect our children for generations to come. Our duty is to be good ancestors by leading them to healing. We must end the generational trauma by acknowledging its harmful effects on our people, communities, and unlearn the oppressive behaviors associated with this trauma."[265]

- The Road to Healing Michigan Participant

"Both my grandparents on my dad's side went to the Ursuline boarding school in St. Ignatius … both spoke Salish as their first language. The first dreams they had were in Salish, not in English. I will never have the privilege of having a dream in Salish. And that is not my fault."[266]

- The Road to Healing Montana Participant

[262] Washington Transcript, 107 edited for clarity.
[263] Montana Transcript, 44-45.
[264] South Dakota Transcript, 144.
[265] Michigan Transcript, 89-90.
[266] Montana Transcript, 42.

"She used to talk about some of the handprints that were on some of the concrete portions of the school, of the forced labored children that built that school… It was her experience as a survivor in Eufaula that fueled her interest in working with Phoenix Indian School survivors and the Arizona community to successfully advocate for at least part of that property to be preserved for public and as a remembrance and recognition, not just of the tragedies that occurred there. And there are many, many tragedies that occurred there. But also in honor of everyone that went there and their spirit's survival that came from that experience"[267]

- The Road to Healing Oklahoma Participant

"Let's bring our children home. It's their inherent right to come home to Alaska. It is a world Indigenous right for our people to come home."[268]

- The Road to Healing Alaska Participant

"I remember my braids being cut off; washed like we were dirty; talked to us like we were dirty. We were dressed in uniforms. They took everything from us and handed, like in the military, this bundle with a towel in it; with soap in it; socks; and a uniform. It wasn't what our ancestors wanted for us when they signed the Treaties. That's not what we agreed to." [269]

- The Road to Healing South Dakota Participant

"I share these stories because we need to remember my aunties, we need to remember everyone that endured all the horrific treatment, the abuse, the violence, everything that they all went through. Because we need to be the truth tellers. We need to be the change makers. All those who are brave enough and courageous enough for sharing the truth." [270]

- The Road to Healing Minnesota Participant

[267] Oklahoma Transcript, 59-62.
[268] Alaska Transcript, 37 edited for clarity.
[269] South Dakota Transcript, 82.
[270] Minnesota Transcript, 83.

"We know that this is not just an issue nationally or on this continent, but it's also a global issue."[271]

- The Road to Healing New Mexico Participant

For nearly two full centuries, the United States pursued, embraced, or permitted the policy of forced assimilation of American Indian, Alaska Native, and Native Hawaiian people. The Federal Indian boarding school system was developed to target Indian children to accomplish this policy objective for over 150 years and influence U.S.-Indian relations and U.S.-Native Hawaiian relations. The United States should fully account for its role in this effort and renounce the forced assimilation of Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community as a legitimate policy objective.

To aid the process of collective and individual healing from the harm and violence caused by the assimilation policy, the United States should affirm an express policy of cultural revitalization—supporting the work of Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community to revitalize their languages, cultural and religious practices, and traditional food systems, and to protect and strengthen intra-Tribal relations.

To complete the Secretary's objectives of the Federal Indian Boarding School Initiative, and to begin the pursuit of this express policy of cultural revitalization, the Assistant Secretary for Indian Affairs Bryan Newland provides **eight** recommendations based on the current findings.

1. **Acknowledge, Apologize, Repudiate, and Affirm.** The U.S. Government should issue a formal acknowledgment of its role in adopting a national policy of forced assimilation of Indian children, and carrying out this policy through the removal and confinement of Indian children from their families and Indian Tribes and the Native Hawaiian Community and placement in the Federal Indian boarding school system. Such an acknowledgment should include a recognition that the United States operated or supported public-private partnerships with religious institutions and organizations to carry out its policy; that many Indian children suffered physical, sexual, and emotional abuse at these institutions, and that many Indian children died; and that these harms continue to impact American Indian and Alaska Native individuals and Indian Country. The United States should accompany this acknowledgment with a formal apology to the individuals, families, and Indian Tribes that were harmed by U.S. policy. In addition, the United States could formally repudiate forced assimilation of American Indian, Alaska Native, and Native Hawaiian people as a national policy, and affirm that it is the policy of the United States to ensure that American Indian, Alaska Native, and Native Hawaiian people have the right to maintain their unique cultural identities and languages.

[271] New Mexico Transcript, 44.

Such a statement should be issued through appropriate means and officials to demonstrate that it is made on behalf of the people of the United States and be accompanied by bold and actionable policies.

2. **Invest in Remedies to the Present-Day Impacts of the Federal Indian Boarding School System.** The United States could invest in healing Indian Tribes, the Native Hawaiian Community, and American Indian, Alaska Native, and Native Hawaiian individuals from the legacy impacts of forced assimilation on a scale that is, at a minimum, commensurate with the investments made in the Federal Indian boarding school system between 1871 and 1969. This investment should be in addition to annual appropriations to fund agency programs to fulfill the U.S. Government's trust and treaty obligations, and consistent with the full scope of its authority to act on behalf of Indians under various articles and clauses of the Constitution. The funding should be designed to remedy the present-day harms caused by historical Federal Indian boarding schools and policies of forced assimilation. These investments should also be designed to reach American Indian, Alaska Native, and Native Hawaiian individuals in urban communities. Funding to remedy the harms flowing from assimilationist policies and institutions should consider that Federal Indian boarding schools received funding and investments above and beyond annual appropriations from Congress.

   Consideration for this investment should be applied to all of these recommendations, and include **five** interdependent areas of focus:

   a. ***Individual and Community Healing.*** Provide funding and support for culturally based, community-driven healing efforts in Indian Country, urban Indian communities, and the Native Hawaiian Community. This support should be aimed at addressing the effects of Adverse Childhood Experiences (ACEs), traumatic stress, and intergenerational trauma. In distributing these funds, U.S. Government agencies should be flexible when it comes to access and use of the funds, including allowing tribal governments and other organizations to coordinate and consolidate funds from a range of federal programs to provide services. The U.S. Government should, support holistic and innovative approaches, including those rooted in connections to homelands and culture, and make these funds available to Indian Tribes, as well as organizations based in American Indian, Alaska Native, and Native Hawaiian communities, including in urban areas. It is also important to develop infrastructure to support this work, including facilities to provide specialized patient services for the treatment of historical and intergenerational trauma caused by the Federal Indian boarding school system and other institutions.

b. ***Family Preservation and Reunification.*** The U.S. Government should continue efforts to preserve, protect, and reunify American Indian and Alaska Native families. This funding would enable Indian Tribes to provide prevention and intervention services based in culture and tradition to families in need. The U.S. Government should support Tribal government agencies and courts in their actions to exercise jurisdiction over Indian child welfare cases, including ensuring that Tribal governments can directly administer child welfare programs, and to support the reunification of families. In addition, the U.S. Government should develop a national strategy for Native children and families, with a defined goal of measurably reducing the number of American Indian, Alaska Native, and Native Hawaiian children in foster care, and supporting Tribes' long-term goals to preserve families and communities though self-determination and self-governance.

c. ***Violence Prevention.*** The United States has trust obligations to protect Indian Tribes, the Native Hawaiian Community, and American Indian, Alaska Native, and Native Hawaiian individuals.[272] Having safe communities and safe family home environments are crucial for positive life outcomes. The U.S. Government should place a priority on prevention and healing from historical and current violence across Indian Country.

Indian Tribes are hampered in their efforts to engage in violence prevention by patchwork jurisdiction over public safety within their borders that limits Tribal governmental powers, as well as the lack of funding to carry out this important work. With some exceptions, Indian Tribes have lacked the ability to exercise criminal jurisdiction over non-Indians on their lands.

There have been several recent reports commissioned by the U.S. Government to examine and combat violence in Indian Country, and many of the recommendations included in those reports have not yet been fulfilled.[273] The U.S. Government should implement many of those recommendations and continue to work to strengthen the ability of Tribes to exercise jurisdiction to directly prevent, investigate, and prosecute violent crimes within Indian country, including violent crimes committed by non-

[272] Cf. U.S. v. Jicarilla Apache Nation, 564 U.S. 162, 175 (2011) (describing "that the Government 'has a real and direct interest' in the guardianship it exercises over the Indian tribes; 'the interest is one which is vested in it as a sovereign.' United States v. Minnesota, 270 U.S. 181, 194 (1926). This is especially so because the Government has often structured the trust relationship to pursue its own policy goals. Thus, while trust administration 'relat[es] to the welfare of the Indians, the maintenance of the limitations which Congress has prescribed as a part of its plan of distribution is distinctly an interest of the United States.' Heckman v. United States, 224 U. S. 413, 437 (1912)"); Oglala Sioux Tribe v. U.S., 674 F.Supp.3d 635 (2023).

[273] *See, e.g.,* The Attorney General's Advisory Committee on American Indian/Alaska Native Children Exposed to Violence: Ending Violence So Children Can Thrive; The Way Forward Report of the Alyce Spotted Bear & Walter Soboleff Commission on Native Children; The Final Report to The President | Activities and Accomplishments of Operation Lady Justice; The Not One More: the Not Invisible Act Commission Final Report.

Indians on Indian lands.[274] The U.S. Government should also invest in violence prevention programs for Indian Tribes, the Native Hawaiian Community, and urban Indian communities; and, invest in tribal justice systems and victim services.

In addition to carrying out recommendations made in federally commissioned reports, the U.S. Government should develop a strategy to measurably reduce the occurrence of Adverse Childhood Experiences (ACEs) for American Indian, Alaska Native, and Native Hawaiian children. In making these investments, the Federal Government should also ensure that Indian Tribes and Alaska Native Villages can exercise self-determination in the use of those funds, including pooling resources from various U.S. Government agencies, to carry-out this work.[275]

d. ***Redress Indian Education.*** The U.S. Government should better fulfill its Treaty and trust obligations, consistent with the full scope of its authority to act on behalf of Indians under various articles and clauses of the Constitution, by investing in high-quality elementary, secondary, and higher education for American Indian, Alaska Native, and Native Hawaiian individuals. This investigation reveals the historical U.S. strategy to use education systems against Indian Tribes and the Native Hawaiian Community. In response, the U.S. Government should adequately fund the Bureau of Indian Education and increase investments to Tribal and public school systems to support American Indian, Alaska Native, and Native Hawaiian students. The U.S. Government should also consider ways to promote public higher education access by providing nationwide in-state tuition rates for American Indian, Alaska Native, and Native Hawaiian individuals at public colleges and universities receiving U.S. Government support. U.S. Government education funding to Indian Tribes and the Native Hawaiian Community should be delivered with minimal agency administrative barriers and represent a correct response to education needs, including for modern infrastructure and water and sanitation systems.

e. ***Revitalization of First American Languages.*** First American languages, those spoken by the Indigenous Peoples of the United States, are a vital aspect of identity, improve academic performance, are foundational to

[274] *See, e.g.*, 2013 and 2022 Reauthorizations of the Violence Against Women Act, recognizing the inherent authority of participating Tribes to exercise special domestic violence criminal jurisdiction over certain defendants, regardless of their Indian or non-Indian status, who commit certain covered crimes in Indian country; Tribal Law and Order Act.

[275] U.S. Government action should be consistent with the commitments laid out in President Biden's Executive Order 14112, *Reforming Federal Funding and Support for Tribal Nations To Better Embrace Our Trust Responsibilities and Promote the Next Era of Tribal Self-Determination*.

individual and group healing, and bolster socioeconomic resilience. The Federal Indian boarding school system, and assimilationist policies, have severely damaged the ability of American Indian and Alaska Native individuals to use, develop, and transmit their languages, oral histories, and knowledge to current and future generations.

The U.S. Government should provide funding to repair that damage and affirm that Indian Tribes and the Native Hawaiian Community have the right to revitalize and use their languages. This funding should support community-based efforts to preserve and revitalize Indian and Native Hawaiian languages. These investments should be available to Indian Tribes, the Native Hawaiian Community, community organizations, schools, and universities in a way that supports language learning and usage by people at all ages and stages of development, and promote ownership of intellectual property by Indian Tribes, Alaska Native Villages, and the Native Hawaiian Community.

3. **Build a National Memorial.** The U.S. Government should establish a national memorial to acknowledge and commemorate the experiences of Indian Tribes, individuals, and families within the Federal Indian boarding school system. This memorial should be accessible to the American people, so it may also educate the nation about the existence and effects of these institutions and honor the loss of American Indian, Alaska Native, and Native Hawaiian children.

4. **Identify and Repatriate Children who Never Returned from Federal Indian Boarding Schools.** The U.S. Government should assist individuals in locating the records of their family members who attended Federal Indian boarding schools. Where children are known to have died and been buried at burial sites, the U.S. Government should assist individuals in locating the burial sites of their family members and supporting them, and Tribes, in any efforts to either protect those burial sites or repatriate their remains to their homelands. Congress should amend the Recreation and Public Purposes Act[276] to facilitate the use of Bureau of Land Management (BLM) lands to allow for the reburial of remains and funerary objects of Indian children who died at Indian boarding schools repatriated pursuant to NAGPRA, or by other authority, and consistent with specific Tribal practices on BLM lands. Many Indian Tribes do not have the land base to rebury human remains and funerary objects in many cases, cultural practices require repatriation to occur in a person's homelands, which are often found on lands managed by the U.S. Government today.

[276] 43 U.S.C. 869 - 869-4.

5. **Return Former Federal Indian Boarding School Sites.** The Department should conduct reviews, upon request of Tribes, of property and title documents for former Indian boarding school sites, including land patents provided to religious institutions and organizations or states, including during territorial status. When required by patent, deed, statute, or other law, including reversionary clause activation, the Department should work to facilitate the return of those Indian boarding school sites to U.S. Government or Tribal ownership. This includes reversionary clauses under the Indian Appropriation act of September 21, 1922, 42 Stat. 994, 995 ("1922 Act") and Tribal-specific legislation. Where former boarding school sites revert to U.S. Government ownership or remain in U.S. Government ownership, the Department should engage with Indian Tribes in government-to-government consultation when asked, to address the ownership and management of those sites, including the protection of burial sites and cultural resources.

6. **Tell the Story of Federal Indian Boarding Schools.** The U.S. Government should work with appropriate institutions to ensure that the American people learn about the role of Federal Indian boarding schools in the history of the United States. This should include allowing people to share their firsthand accounts of their time at Federal Indian boarding schools. Afterward, the U.S. Government should make information regarding Federal Indian boarding schools available to individuals, Indian Tribes, organizations, academic institutions, and government agencies.

7. **Invest in Further Research.** The U.S. Government should make further investments in research regarding the present-day health and economic impacts of the Federal Indian Boarding School system, as well as policies of child removal, confinement, and forced assimilation. This research should be designed to understand how these policies affected mental and physical health outcomes for individuals, families, and their descendants; and, how these policies affected individual, family, and tribal wealth, health, and well-being.

   For biomedical and behavioral research, Congress should appropriate funds to the National Institutes of Health (NIH), in the Department of Health & Human Services, to support research grants, contracts, cooperative agreements, or other transactions to develop new and expand on existing scientific studies, including the Running Bear studies, examining the impact of the Federal Indian boarding school system on American Indian, Alaska Native, and Native Hawaiian physical, mental, and emotional health, parenting practices, and well-being at the individual, familial, and population levels. This action should also include supporting studies in collaboration with Indian Tribes and the Native Hawaiian Community that test and advance culturally-relevant interventions that promote healing from intergenerational trauma at the individual, familial, and population levels.

8. **Advance International Relationships.** The U.S. Government could strengthen engagement with other countries with their own histories of boarding schools or other assimilationist policies, including Canada, Australia, and New Zealand to exchange best practices for healing and redress between Federal governments and Indigenous governments for Indigenous child removal through boarding schools and predatory foster care and adoption practices. To further this goal, the U.S. should expand capacity, including through the Department's Bureau of Indian Affairs (BIA), to support engagement on international Indigenous issues. To strengthen the U.S. Government's expertise on Indigenous issues globally and connections with other countries, the U.S. Government should establish an ambassador position focused on engagement on international Indigenous issues.

"My mother and grandmother did not have any choice in how they were raised or educated. They were in Indian boarding schools, and because they were there, I unknowingly was born into shame, survival, and then, later in life, pride. The way I live now without shame is to honor my grandmother and mother and insist the children who lived at those godforsaken residential schools did exist; their lives matter; their children's lives matter. If the United States Government cannot say that, then we the Indigenous survivors must say that. Every child matters."

- The Road to Healing Washington Participant

The U.S. Department of the Interior values the special contributions to this report from the following:

In Memory of BTFA AIRR Director Maria Meredith.

With notable appreciation for the dedication and care by:

U.S. Secretary of the Interior Deb Haaland
Bureau of Trust Funds Administration Director Jerry Gidner and Team to include:
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Office of the Assistant Secretary for Indian Affairs:
U.S. Assistant Secretary for Indian Affairs Bryan Newland
U.S. Principal Deputy Assistant Secretary Wizipan Little Elk
U.S. Deputy Assistant Secretary Kathryn Isom-Clause
Advisor Joaquin R. Gallegos
Chief of Staff Clint J. Bowers
Senior Project Manager Chelsea J. Wilson
Office of Public Affairs Director Joshua Barnett
Deputy Director Office of Public Affairs Wesley Parrell
Senior Counselor Meghan Bishop
Senior Counselor Samuel Kohn
Senior Advisor Tracy Goodluck

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Chief of Staff Rachael Taylor
Senior Counselor Melissa Schwartz and her team to include: Tyler Cherry, John Grandy, Giovanni Rocco, Felicia Salazar, Sally Tucker, Michelle Gullett, and Justin Horn
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Chair Shelly Lowe and the National Endowment for the Humanities
CEO Deb Parker and the National Native American Boarding School Healing Coalition
National Archives and Records Administration
The Department of the Interior Library

4.1 Resolution No. 24-5427, For the Purpose of Confirming the Reappointment of Chris Oxley to the Metropolitan Exposition Recreation Commission

Consent Agenda

Metro Council Meeting

Thursday, September 26, 2024

BEFORE THE METRO COUNCIL

FOR THE PURPOSE OF CONFIRMING THE REAPPOINTMENT OF CHRIS OXLEY TO THE METROPOLITAN EXPOSITION RECREATION COMMISSION	)))	RESOLUTION NO. 24-5427 Introduced by Council President Lynn Peterson

WHEREAS, the Metro Code, Section 6.01.030(a) provides that the Metro Council President shall appoint all members to the Metropolitan Exposition Recreation Commission ("the Commission"); and

WHEREAS, the Metro Code, Section 6.01.030(b) provides that the Metro Council President's appointments to the Commission are subject to confirmation by the Metro Council; and

WHEREAS, pursuant to Metro Code, Section 6.01.030(d)(2) the City of Portland has nominated Chris Oxley for reappointment on the Commission; and

WHEREAS, pursuant to Metro Code, Section 6.01.030(e)(1), the Metro Council President has the authority to concur with the City of Portland's nomination of Mr. Oxley or reject it; and

WHEREAS, the Metro Council President has concurred with the City of Portland's nomination of Chris Oxley and submitted the reappointment of Mr. Oxley to the Metro Council for confirmation; and

WHEREAS, the Metro Council finds that Chris Oxley has the experience and expertise to make a substantial contribution to the Commission's work; now therefore

BE IT RESOLVED that the Metro Council hereby confirms the Council President's reappointment of Chris Oxley as a member of the Metropolitan Exposition Recreation Commission, commencing on September 26, 2024, through September 25, 2028.

ADOPTED by the Metro Council this 26th day of September 2024.

Lynn Peterson, Council President

Approved as to Form:

Carrie MacLaren, Metro Attorney

STAFF REPORT

IN CONSIDERATION OF RESOLUTION NO. 24-5427, FOR THE PURPOSE OF CONFIRMING THE REAPPOINTMENT OF CHRIS OXLEY TO THE METROPOLITAN EXPOSITION RECREATION COMMISSION

Date: September 12, 2024

Prepared by: Craig Stroud
Interim General Manager, Visitor Venues

BACKGROUND

The Metro Code, Section 6.01.030(a), gives the Metro Council President sole authority to appoint all members of the Metropolitan Exposition Recreation Commission, subject to confirmation by the Council. Section 6.01.030 (d)(2) of the Code allows the City of Portland to nominate a candidate for appointment for the Council President's consideration. Under Section 6.01.030(e)(1) of the Metro Code, the Metro Council President has the authority to concur with the City of Portland's nomination and submit it to the Council for confirmation or reject it.

The City of Portland has nominated Chris Oxley for reappointment on the Commission. The Council President has concurred with this nomination and accordingly submitted her appointment of Mr. Oxley to the Metro Council for confirmation. If confirmed, Mr. Oxley will, pursuant to the Metro Code, serve a 4-year term beginning September 26, 2024, through September 25, 2028.

ANALYSIS/INFORMATION

- **Known Opposition. None**
- **Legal Antecedents.** Metro Code as referenced above.
- **Anticipated Effects.** Reappointment of Mr. Oxley to the Metropolitan Exposition Recreation Commission, in the manner provided by the Metro Code.
- **Budget Impacts.** None

RECOMMENDED ACTION

The Metro Council President recommends approval of Resolution 24-5427 to confirm the reappointment of Chris Oxley to the Metropolitan Exposition Recreation Commission for a four-year term beginning on September 26, 2024 and ending September 25, 2028.

5.1 Resolution No. 24-5431 For the Purpose of Accepting the Oregon Zoo 2024 Campus Plan

Resolution

Metro Council Meeting

Thursday, September 26, 2024

BEFORE THE METRO COUNCIL

FOR THE PURPOSE OF ACCEPTING THE OREGON ZOO 2024 CAMPUS PLAN	))))))	RESOLUTION NO. 24- 5431 Introduced by Chief Operating Officer Marissa Madrigal, with the concurrence of Council President Lynn Peterson

WHEREAS, beginning in fall 2022, staff from the Oregon Zoo and Capital Asset Management began work on a new draft Oregon Zoo Campus Plan (the "Campus Plan"), focusing on improvements to areas of the zoo not improved by the 2008 Oregon Zoo Bond, Measure 26-96; and

WHEREAS, the Metro Council recognized the need for further renewal, upgrades and improvements at the Oregon Zoo, the Portland metropolitan area's most-visited ticketed attraction, to advance regional goals for racial equity, accessibility, climate resilience and economic vitality; and

WHEREAS, staff engaged a diverse range of community organizations and leaders, Zoo guests and members, staff, the Oregon Zoo Foundation and other stakeholders to understand current needs and conditions at the zoo, thus informing and guiding the development of the new draft Campus Plan; and

WHEREAS, staff considered and applied the most modern standards for animal care and habitat design to the development of the draft Campus Plan; and

WHEREAS, the draft Campus Plan sought to emphasize the highest standards of animal health and well-being across the zoo; improve zoo experiences and accessibility for all visitors regardless of age, ability or background; and advance ambitious goals for energy and water conservation; and

WHEREAS, the draft Campus Plan incorporates and will significantly advance Metro's Strategic Plan to Advance Equity, Diversity and Inclusion, and will be governed by and implement its Equity in Contracting, Construction Career Pathways, Construction Clean Air and Sustainable Buildings and Sites policies, and

WHEREAS, on October 26, 2023, the Metro Council accepted the draft Campus Plan concepts via Resolution No. 23-5357 ("For the Purpose of Accepting the Draft Oregon Zoo Campus Plan Concepts"), directing Oregon Zoo staff to submit relevant portions of the draft Campus Plan concepts for permitting review by the City of Portland, and to seek renewal of the Oregon Zoo's 10-year Conditional Use Master Plan Permit based on them, and directing staff to explore potential capital finance options to advance the Campus Plan; and

WHEREAS, via Resolution No. 24-5375 ("For the Purpose of Submitting to the Metro Area Voters A $380 Million General Obligation Oregon Zoo Bond Measure to Protect Animal Health, Provide Conservation Education and Increase Sustainability, and Setting Forth the Official Intent of the Metro Council to Reimburse Certain Expenditures Out of the Proceeds of General Obligation Bonds Upon Issuance"), the Metro Council referred the 2024 Oregon Zoo Bond, Measure 26-244 to the voters of the Metro Region for the May 2024 general election; and

WHEREAS, on May 22, 2024, the voters of the Metro Region passed the 2024 Oregon Zoo Bond, Measure 26-244; and

WHEREAS, on June 28, 2024, the City of Portland hearing officer decision was issued approving the Oregon Zoo's renewal of its 10-year Conditional Use Master Plan Permit; and

WHEREAS, the Metro Council directed that, following the renewal of a Conditional Use Permit from the City of Portland, the updated Campus Plan, with any City of Portland-required modifications, would be brought to the Metro Council for consideration; and

WHEREAS, the zoo has now completed the 2024 Oregon Zoo Campus Plan, providing a 20-year plan for future bond funded and non-bond funded development at the Oregon Zoo, and presents the 2024 Oregon Zoo Campus Plan to the Metro Council for approval; now therefore,

BE IT RESOLVED that the Metro Council hereby:

Accepts and approves the Oregon Zoo Campus Plan attached hereto as Exhibit A to the Staff Report.

ADOPTED by the Metro Council this 26th day of September 2024.

Lynn Peterson, Metro Council President

Approved as to Form:

Carrie MacLaren, Metro Attorney

IN CONSIDERATION OF RESOLUTION NO. 24-5431, FOR THE PURPOSE OF ACCEPTING THE OREGON ZOO 2024 CAMPUS PLAN

Date: September 16, 2024

Department: Oregon Zoo

Council Meeting Date: September 26, 2024

Prepared by: Kristin Solomon
kristin.solomon@oregonmetro.gov

Presenters:

Heidi Rahn (she/her)
Oregon Zoo Director

Utpal Passi

Length: 15 minutes

ISSUE STATEMENT

The Metro Council is asked to consider accepting the final Oregon Zoo 2024 Campus Plan. If approved, the plan would support the implementation of a new phase of capital investments to protect animal health and well-being, provide conservation education, increase sustainability and improve accessibility at the zoo.

ACTION REQUESTED

Adopt Resolution No. 24-5431, for the Purpose of Accepting the Oregon Zoo 2024 Campus Plan.

IDENTIFIED POLICY OUTCOMES

- Advance the Oregon Zoo's mission of connecting our community to the wonder of wildlife to create a better future for all.
- Support animal health and well-being, conservation education for youth and families, energy and water conservation, accessibility for all ages and abilities, and climate resilience at the zoo.
- Maintain accreditation by the Association of Zoos and Aquariums. First accredited in 1974, the Oregon Zoo is one of only two zoos in the country to be continuously accredited for 50 years.

POLICY QUESTION(S)

- Does the recommended Oregon Zoo Campus Plan and proposed implementation plan serve the needs of the zoo's animals, visitors and facilities; fulfill Council direction and policy; and reflect community and stakeholder input?

POLICY OPTIONS FOR COUNCIL TO CONSIDER

- Adopt the Resolution.
- Request changes to the plan prior to adoption.

STAFF RECOMMENDATIONS

Following more than a year of engagement and preparation, staff recommend that Council adopt Resolution No. 24-5431 Accepting the Oregon Zoo 2024 Campus Plan.

STRATEGIC CONTEXT & FRAMING COUNCIL DISCUSSION

The Oregon Zoo is a source of pride for the greater Portland region, advancing conservation education and species recovery locally as well as around the globe. The zoo is committed to continually improving animal well-being, guest and staff experiences, education, accessibility, climate resilience and conservation across its 64-acre campus in Washington Park.

In fall 2022, staff from the Oregon Zoo and Capital Asset Management began work on a new Oregon Zoo Campus Plan to replace the Zoo's 2011 Comprehensive Capital Master Plan that guided implementation of the 2008 bond measure. The new plan focuses on areas of the campus that were not targeted for substantial investment from the 2008 bond. These include the zoo's oldest existing habitats and buildings, as well as outdated educational exhibits and not fully accessible pathways and facilities.

The 2024 Oregon Zoo Campus Plan follows on the successes of the 2008 bond to begin a new phase of capital improvements at the zoo. This phase would implement a substantial portion of the Campus Plan, advancing the Metro Council's goals for animal health, climate, conservation education and economic vitality in one of the region's most beloved community institutions.

COMMUNITY ENGAGEMENT AND SUPPORT

Development of the Campus Plan included in-person engagement sessions with historically marginalized communities, including but not limited to representatives of the following organizations:

- Adelante Mujeres
- Autism Empowerment
- Boys & Girls Club of the Portland Metro Area
- Center for African Immigrants and Refugees
- Centro Cultural
- People of Color Outdoors
- Rosewood Initiative
- Self-Enhancement Inc.
- Youth Empowerment Project PNW

Staff also engaged with youth participating in the Zoo Apprenticeship Program; the zoo's Community Advocacy Council, composed of young professionals of color; zoo volunteers and members; staff and board of the Oregon Zoo Foundation; and zoo staff.

Zoo staff heard broad community support for the goals of the draft plan, particularly goals to improve accessibility, wayfinding and other visitor facilities at the zoo, and to update or replace outdated animal habitats. Zoo staff were also supportive of proposed improvements to behind-the-scenes care-staff facilities, guest amenities, storage areas and service access.

Through fall 2023 and into the winter, staff and partners at the Oregon Zoo Foundation have continued to engage a broad range of stakeholders, neighbors and community leaders to share the mission of the Oregon Zoo and how it is expressed through the new Campus Plan and the 2024 bond measure.

LEGAL ANTECEDENTS

If accepted, the 2024 Campus Plan will update the 2011 Comprehensive Capital Master Plan, which was approved by the Metro Council through Resolution No. 11-4304.

The 2023 draft Oregon Zoo Campus Plan Concepts, approved by the Metro Council through Resolution No. 23-5357, directed the zoo to seek and obtain a renewed 10-year Conditional Use Master Plan permit from the City of Portland and explore financing options, which led to the adoption of Metro Council Resolution No. 24-5375, referring the 2024 Oregon Zoo Bond Measure 26-244 to region's voters in May 2024.

The new Campus Plan's finalization and implementation will also advance several other pre-existing Metro Council policies, including but not limited to:

- Construction Career Pathways Framework
- Regional Workforce Equity Agreement
- Subcontractor Equity Program
- Sustainable Sites and Buildings Policy
- Clean Air Construction Policy
- Percent for Art Policy

ANTICIPATED EFFECTS

Work to prepare for implementation of the Campus Plan and ballot measure commitments will continue following Council adoption of the resolution. A team will be developed to implement the Campus Plan, project budgets will be approved via the Capital Improvement Plan process, Metro Council will appoint a Zoo Bond Citizens' Oversight Committee, and Meto Council polices will be advanced.

BACKGROUND

Council discussed the draft Campus Plan at work sessions on May 16 and September 5, 2023; the latter included a tour of many of the Plan's proposed focus areas. On October 26, 2023, the Metro Council adopted Resolution No. 23-5357, accepting the draft Campus Plan's concepts, with emphases on animal care and well-being, sustainability and conservation, and visitor education and accessibility. The resolution directed staff to begin the work of permitting review with the City of Portland to renew the zoo's Comprehensive Use Master Plan, and to continue refining the Campus Plan for final adoption in 2024.

Additionally, Council's adoption of Resolution No. 23-5357 directed staff to prepare capital financing and business planning options for Council's consideration. The Council advanced the zoo's proposed capital project prioritization and financing approach, including the potential of a Phase 2 bond measure, at a work session on November 21, 2023. At a work session on January 9, 2024, the Metro Council discussed proposed priorities for a next phase of bond-funded investments and provided direction to proceed with the preparation of bond measure referral for the Council's consideration.

On February 2, Council approved Resolution No. 24-5375, which referred the Oregon Zoo Phase 2 bond measure to the May ballot. The measure was passed on May 21st. On June 28, 2024, City of Portland hearing officer decision was issued approving the Oregon Zoo's renewal of its 10-year Conditional Use Master Plan Permit.

ATTACHMENTS

- Resolution No. 24-5431
- Exhibit A

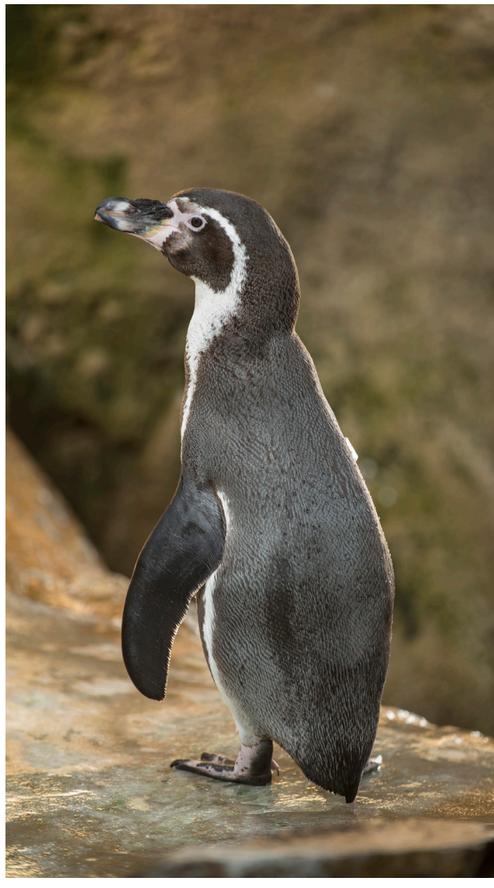
Oregon Zoo
Together for Wildlife

clr
DESIGN

Oregon Zoo Campus Plan
2024







The Oregon Zoo is part of Metro.

Metro

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CAMPUS PLAN 2024

PREPARED FOR:

Oregon Zoo
Together for Wildlife

4001 SW Canyon Rd,
Portland, OR 97221

PREPARED BY:

clr DESIGN

833 Chestnut Street, Suite 909
Philadelphia, PA 19107

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PLANNING PARTICIPANTS

ADMINISTRATION
Heidi Rahn – Zoo Director
Utpal Passi – Deputy Director
Krista Swan – Director of Marketing
Hova Najarian – Director of Communications
Melanie Sorensen – Director of Education & Conservation
Lori Ford – Culture & Inclusion Manager
Charetta Long – Equity & Engagement Manager
Shervin Hess – Conservation Manager

OPERATIONS
Ivan Ratcli f – Director of Business Operations
Tim McCormack – Director of Facilities
Jennifer Burns – Safety & Health Program Manager
Mickey Webb – Director of Events
Michael Harris – Maintenance Manager
Seth Menser – Horticulture Manager
Jesse Lene – Building Controls Manager
Joel Lavespere – Public Safety Manager
Ron Herrington – Custodial Supervisor

ANIMAL CARE
Steve Lefave – Curator of Elephants
Kate Gilmore – Curator of Primates & Ambassador Animals
Kelly Gomez – Curator of Africa & Marine Life
Travis Koons – Curator of Birds, Reptiles & Native Conservation
Asaba Mukobi – Area Supervisor, Primates
Eliza Lee – Area Supervisor, Ambassador Animals
Amy Hash – Area Supervisor, Africa & Marine Life
Marcus Jason – Area Supervisor, Birds, Reptiles & Small Mammals
Jen Osburn-Eliot – Area Supervisor, North America

ANIMAL HEALTH, WELFARE, & NUTRITION
Carlos Sanchez – Director of Animal Health
Nadja Wielebnowski – Animal Welfare & Research Manager

OREGON METRO
Kristin Solomon – Senior Capital Project Manager
Staci Pfau – Senior Capital Project Manager
Joel Morton – Senior Attorney
Tom Rogers – Finance Manager
John Lindenthal – Program Director, Construction Project Management O f ce
Jenna Garmon – Sustainability manager
Dana Visse – Climate Analyst
Sarah Allison – Sustainability Planner

OREGON ZOO FOUNDATION
Julie Fitzgerald – Executive Director

CLR DESIGN
Gregg Leicester – Principal in Charge
Dan Miller – Project Manager, Architect
Nick Iott – Landscape Architect
Kelsey Weber – Architect
Scott Dietrich – Graphic Designer

WALKER MACY
Chelsea McCann – Principal
Emily De Lautour – Landscape Architect
Betty Lou Poston – Urban Designer
Sierra Gardiner – Landscape Designer

KPFF CONSULTING ENGINEERS
Daan Dommels – Principal
Paul Schmidtke – Civil Engineer

PAE ENGINEERS
Allan Montpellier – Principal
Tim Elley – Project Manager, Mechanical
Karina Hershberg – Regenerative Design
Robert Smith – Electrical
Steve Kelly – Technology

TJP ENGINEERING
Terri Johnson – Principal, LSS Engineer

EQUILIBRIUM ENGINEERING
Ed Quesenberry – Principal, Structural Engineer
Leif Erickson – Principal, Structural Engineer

GRI
Jason Bock – Principal
Nick Hatch – Geotechnical Engineer

DCW COST MANAGEMENT
Andrew Jonsson – Technical Lead
Bryan Baldwin – Project Manager, Cost Estimator

JP MITCHELL, LLC
Jim Mitchell – Advisor

COMMUNITY ENGAGEMENT
Terry O'Connor – Terry O'Connor Consulting
Nette Pletcher – Beez Kneez Creative

THE BOOKIN GROUP
Chris Hagerman – Principal, Senior Planner
Debbie Cleek – Principal, Senior Planner

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EXECUTIVE SUMMARY

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INTRODUCTION

Together for Wildlife

For nearly 135 years, the Oregon Zoo has offered local residents and visitors from around world a chance to connect with wildlife. Along the way, it has evolved into a hub for the science of animal well-being and is an internationally recognized conservation leader. The zoo is helping to save all kinds of endangered species, from California condors to northwestern pond turtles and has generated a tremendous amount of community pride and support.

In 2008, people across the region acted on behalf of animals and sustainability with an overwhelming vote to invest in the zoo. The 2008 zoo bond measure was transformative. It provided for a dramatic overhaul to some of our most popular animal habitats, plus a state-of-the-art veterinary medical center, an education center, and much more. All told, the bond reshaped nearly 40% of the zoo campus — an impact enjoyed by millions of visitors.

Even with all that has been achieved, there are habitats in sections of the zoo that date to the late 1950s and are not able to keep pace with changing standards. There also are accessibility challenges and aging infrastructure. The zoo has a lot to be proud of, but at the same time there is more work to do — for our animals, for our guests and for our environment.

Collaborating with a professional planning team from CLR Design, the zoo set priorities through a nearly yearlong engagement process involving zoo guests, staff members, community groups, experts in animal care and conservation, and other stakeholders. The Metro Council provided additional input and guidance.

All of that work is reflected in this 2024 campus plan, which will help shape the next era of animal care, guest accessibility and resource conservation at the zoo. Focusing on areas not improved through the 2008 bond, the plan proposes updating some of the zoo's oldest animal areas, improving accessibility and amenities for guests of all ages and abilities, and ensuring the zoo does its part to both mitigate and respond to a changing climate.

The Oregon Zoo's mission is connecting our community to the wonder of wildlife to create a better future for all. This plan envisions the physical manifestation of that mission: a space for the zoo to create connections, spark interests and foster relationships that will benefit not just this region but the world — a campus that will bring us together for wildlife.



CONTEXT

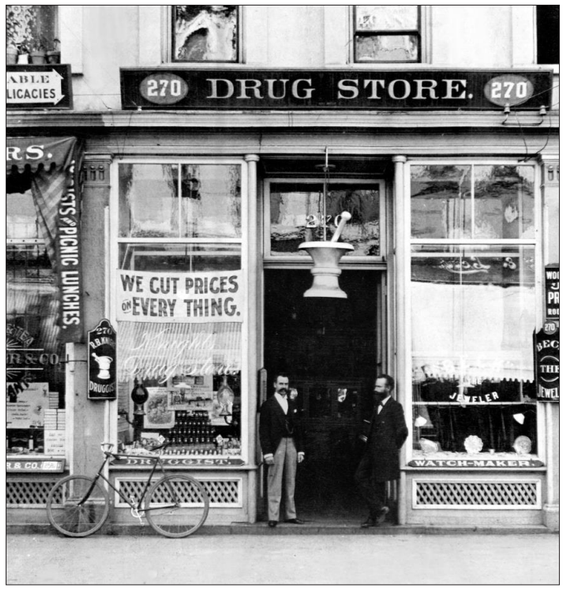
The Oregon Zoo has been at its current 64-acre location in Portland's West Hills since moving to Washington Park in 1959. The zoo is a key community resource and regional attraction, currently welcoming around 1.3 million visitors annually.

Many updates and groundbreaking animal-care advancements have been made over the years, facilitated most recently through a 2008 bond measure and subsequent capital projects. Improvements to the zoo over the past decade were guided by a previous Campus Plan completed in late 2011.

History

The zoo's history dates back to 1888 when a pharmacist named Richard Knight donated a grizzly bear and a small number of exotic animals he had acquired to the City of Portland. This led to the establishment of the Portland Zoo at a site in lower Washington Park. Over the next 70 years, the diversity and number of species housed at the zoo grew dramatically. In 1954, A successful bond measure financed the construction of the Portland Zoological Gardens, which opened at the current zoo site in 1959.

The Metropolitan Service District assumed management responsibility of the zoo in 1976 and oversaw significant renovations over the next 20 years. The zoo became the Oregon Zoo in 1998, the same year that the regional MAX light rail system was connected through the Washington Park station.



Richard Knight's Pharmacy

Ten years later, local voters approved a bond measure which, along with support from Oregon Zoo Foundation donors, funded eight major projects defined by the 2011 Campus Plan. These transformative projects reimagined roughly 40% of the zoo's usable area and include the Veterinary Medical Center, Education Center, Condors of the Columbia, Elephant Lands, Polar Passage, and Primate Forest among others.



Aerial photograph, Oregon Zoo 1967

From its humble beginnings 135 years ago–through strong support from the local community, strategic planning, and responsible development–the zoo has transformed into a world-class center for wildlife education, species recovery and conservation science.

Site Characteristics

Located about two miles southwest of downtown Portland, the zoo landscape is characterized by around 80 vertical feet of north-to-south slope and surrounded by mature Pacific Northwest conifer forest. The site is easily reached via MAX light rail lines as well as by car from Highway 26 and SW Kingston Drive.

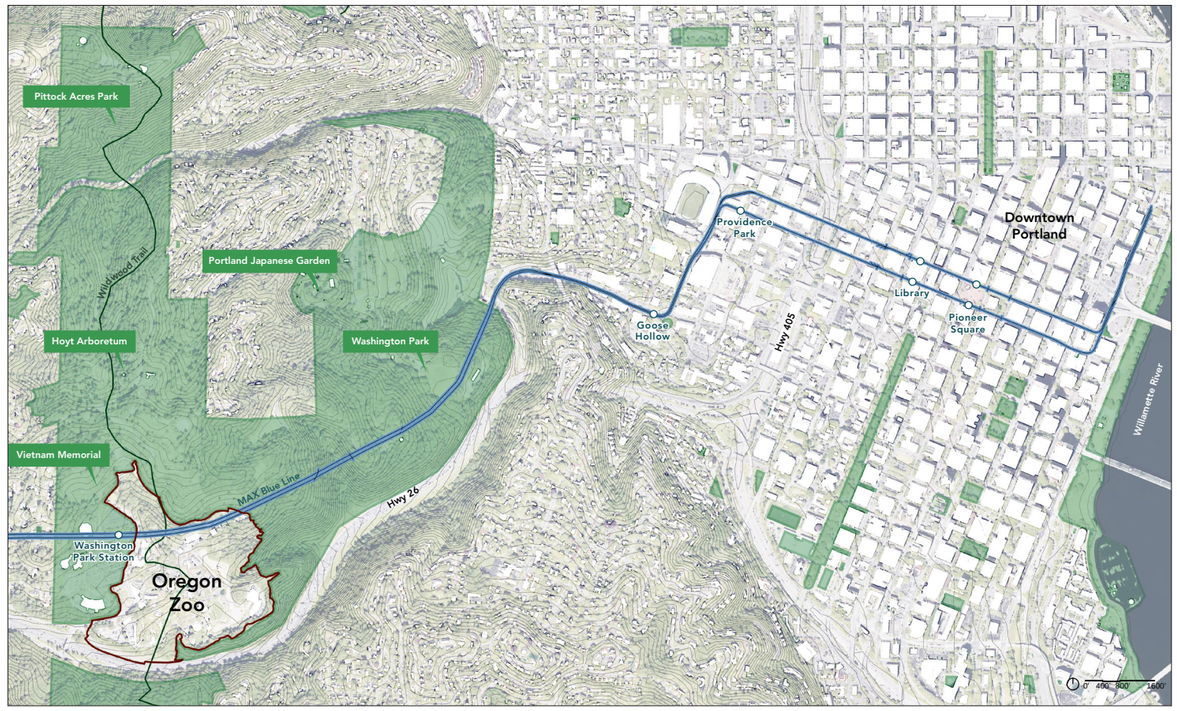
Various bike and foot trails also provide access and recreation around the zoo. The slope, forested landscape and park surroundings offer excellent views and adjacencies throughout the campus but limit the zoo's usable footprint to roughly 43 acres.

The hills surrounding the zoo, known as the Tualatin Mountains, are defined by a series of active and inactive faults leading to a generally seismically active condition. The land the zoo sits on is part of an active mapped prehistoric landslide encompassing roughly 125 acres, ranging from 20 to 100 feet deep. The zoo's ongoing monitoring program has recorded slow but steady movement near the edges of the slide and at the toe of the main slope.

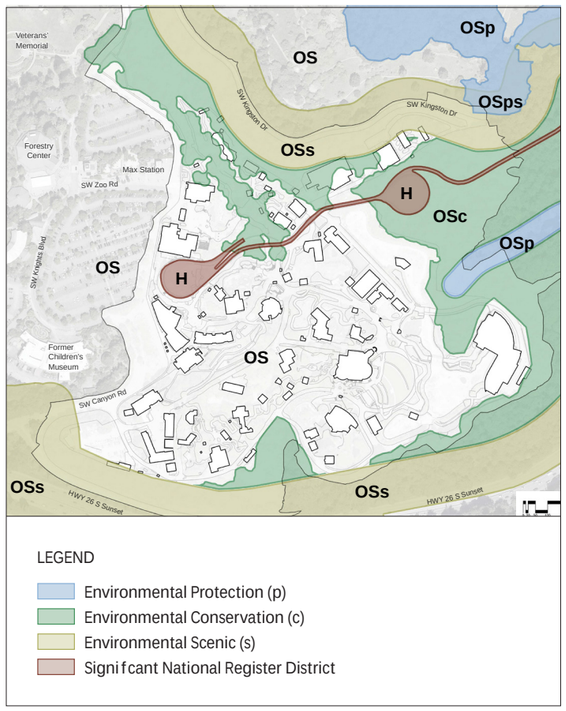
Future zoo development should maintain current net loading with balanced cut-and-fills, avoid steep sloped areas, and limit water infiltration as much as possible. Foundation design and excavation will also be critical components of all future designs. Structures are likely to require a combination of mat foundations, conventional spread foundations tied together with grade beams and–for those near the toe and head of the landslide scarp–deep foundations such as micropiles or drilled shafts.

Washington Park is zoned by the City of Portland as Open Space. The Open Space zone is intended to preserve and enhance public and private open, natural, or improved park and recreational areas. Additional overlay designations fall within the Open Space zone encompassing the zoo, including environmental protection, environmental conservation and scenic resources.

Protections provided by the environmental overlay zones, which preserve the amazing natural environment surrounding the zoo also impact the improvable area within the zoo's boundaries. Development adjacent to these areas must be strategic, limited within undisturbed areas, and compliant with additional environmental regulations as defined by Title 33 of the Portland City Code.



Zoo context map



Zoo open space zoning overlay map



Veterinary Medical Center

Planning and Strategic Framework

This Campus Plan is built on the framework of the recent Oregon Zoo Strategic Plan, drawing on knowledge gained from the 2011 Campus Plan and subsequent capital projects. Context provided by these elements helps to de f ne the goals and drivers behind current planning e f orts, which will inform progress over the next 10 to 15 years. Many of the Strategic Plan's focus areas tie directly to physical campus planning and provide important context for proposed elements in this Campus Plan.

2020 – 2023 Oregon Zoo Strategic Plan Focus Areas:

- Lead the way in animal care & welfare.
- Advance wildlife conservation.
- Deliver an inspiring guest experience (every time).
- Create diverse, equitable & inclusive environments.
- Connect with our communities.
- Provide meaningful and ful f lling sta f experiences.
- Achieve f nancial sustainability.

The capital projects associated with the 2011 Campus Plan were transformative, advancing animal care and well-being, environmental sustainability and the zoo's ability to provide high-quality conservation education. Condors of the Columbia highlights a conservation program that has boosted the wild population of critically endangered California condors in signi f cant ways. The Veterinary Medical Center allows zoo sta f to provide industry-leading medical care to the resident animals. The Education Center provides a new home for the programs that help ful f ll the zoo's commitment to conservation education and outreach.

Most recently, Elephant Lands, Polar Passage, Primate Forest, and Rhino Ridge signi f cantly expanded and improved both the indoor and outdoor housing spaces while supporting activity and choice to enhance the well-being of these complex animals.



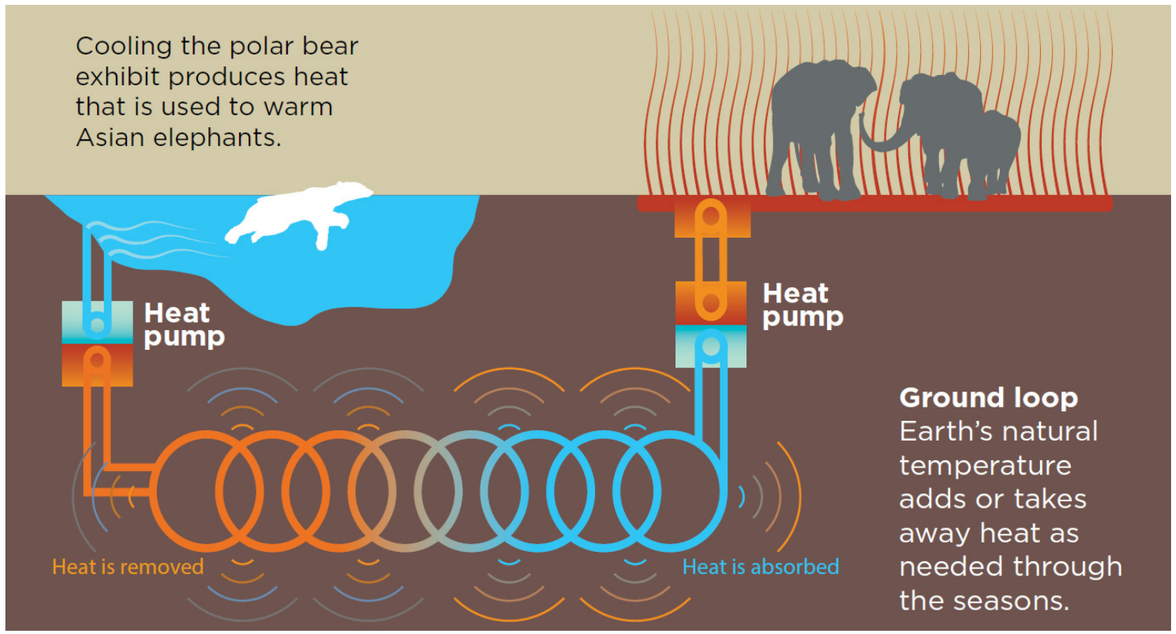
Education Center

All of the above projects represent critical progress for the Oregon Zoo, and provide important information for planning future directions. Some key re f ections informing this campus plan include:

- Enhancing animal well-being often requires a larger care footprint compared to older/existing facilities. On a constrained site, this can lead to fewer animals and less species diversity. One goal of this Campus Plan is to increase the diversity of life represented at the zoo.
- Sustainability and climate resiliency measures included in recent projects have been largely successful case studies for continued development. Rainwater and solar harvesting systems at the Education Center, Elephant Lands and VMC, as well as the geothermal heat exchanger between polar bears and elephants, are all worth studying to determine whether aspects may be incorporated into new work.
- E f orts to publicly showcase animal care have been very successful for engaging zoo guests, but special attention should also be paid to providing top-quality and naturalistic viewing opportunities.
- It can be a challenge to maintain quality guest experience during ongoing construction, especially when large areas of the zoo are closed for redevelopment. Phasing and implementation plans must be carefully developed to optimize the guest experience during such times.
- As climate change, invasive species, disease and other threats to biodiversity intensify, the broader conservation community is turning to the Oregon Zoo to advance species recovery e f orts both on-grounds and in the f eld. The zoo supports industry-leading animal care and conservation work, but studies have shown many guests are not aware of these programs.



Primate Forest



Successful heat exchange system between polar bear (2021) and elephant (2015)

THE PLANNING PROCESS

This final report represents a consensus reached through the input of hundreds of people, numerous planning workshops, community engagement sessions, and detailed engineering analysis over the course of 2023. The process was divided into five distinct tasks.

I. WORK PLANNING

Develop a detailed schedule and strategy to deliver the Campus Plan as envisioned by the zoo.

II. PRELIMINARY PROGRAMMING

Define the goals of the Campus Plan and consider what programmatic elements are required to achieve them.

III. INVENTORY & ANALYSIS

Review and analyze the existing zoo landform, facilities, infrastructure, utilities, circulation, opportunities and constraints.

IV. CAMPUS PLAN DEVELOPMENT

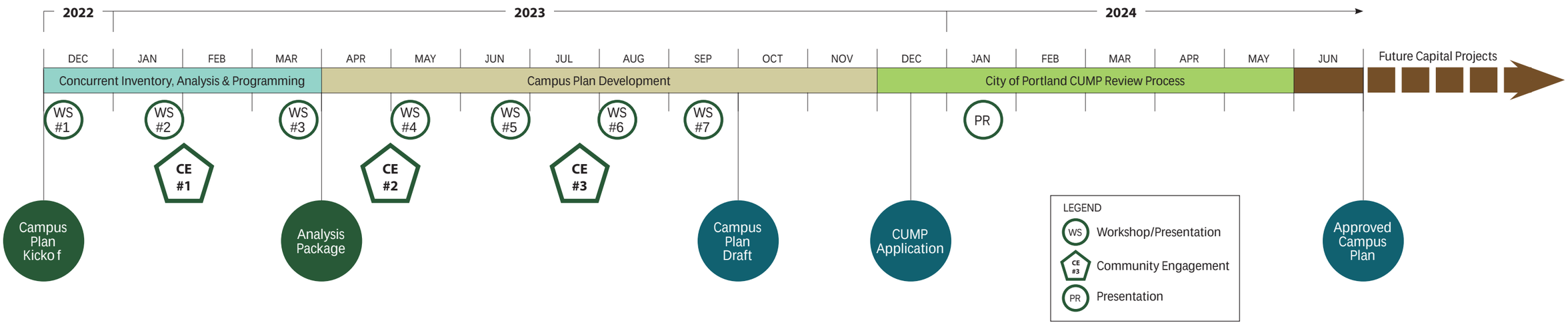
Using information gathered in the programming and analysis phases, establish priority project zones and define the direction of future improvement and development.

V. CONDITIONAL USE MASTER PLAN

Obtain preliminary approval from the City of Portland for the concepts developed in the planning phase.

Planning Phases, Components & Deliverables

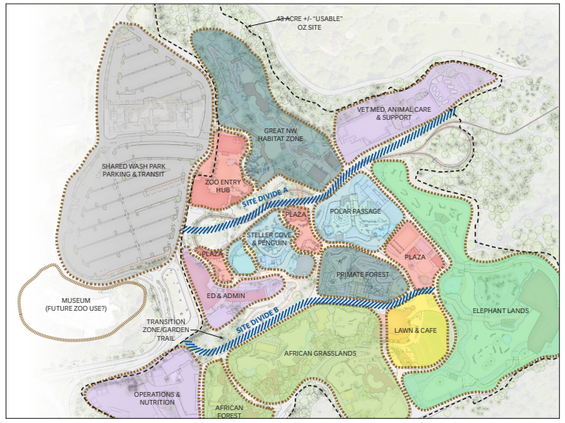
PHASE	INVENTORY & ANALYSIS	PRELIMINARY PROGRAMMING	CAMPUS PLAN DEVELOPMENT	STRATEGIC IMPLEMENTATION
KEY COMPONENTS	Building Conditions Existing Tree Circulation Land Use Land Form Sustainable Facility Performance Water and energy Animal Population Shows & Encounters Guest Services Operations	Mission / Values Planning Goals & Objectives Opportunities & Constraints Preliminary Plan Organization Diagrams Preliminary Exhibit Concepts Preliminary Circulation Guest Services Concepts	Plan Refinement Collection Plan Refinement Project Zones / Packages Phasing Scenarios Options Testing	Plan Refinement Project Packaging Implementation / Phasing Project Programs & Budgets Affirm Goals & Objectives Achieved
DELIVERABLES	Workshop Notes, Drawings, Inventory & Analysis Package	Workshop Notes & Diagrams	Workshop Notes, Illustrative Plan(s) & Preliminary Report Drafts	Workshop Notes, Schedules, Preliminary Report, Preliminary Budgets → Conditional Use Master plan; Comprehensive Campus Plan Report



Workshop Approach

Throughout the planning process, participants gathered for collaborative in-depth workshops covering key topics and including many perspectives from zoo staff as well as the team of planners and engineers. Each workshop formed the common baseline to inform next steps and build consensus on the planning direction.

Through this highly interactive approach to planning and decision-making, team members gained an understanding of what makes the zoo and its community special. Exploring and respecting the points of view, observations, recommendations, and expectations of this specific zoo community results in a tailored Campus Plan for the future that is thorough, creative, achievable and mindful of the zoo's history, culture and mission.



Example of workshop diagram – Land Use Area

Community Engagement

Many diverse stakeholder groups are affected by long-range planning efforts. In recognition of this, the internal planning team included dedicated representatives from Metro, the Oregon Zoo Foundation and all zoo departments, including administration, operations, guest services, facilities, maintenance, veterinary care, animal care, education, volunteers, communications and marketing.

Engaging with the broader community to inform planning efforts was also a high priority. Terry O'Connor Consulting, in partnership with Nette Pletcher (Beez Kneez Creative), led an extensive effort to identify stakeholder groups, learn about current zoo experiences and needs, and test design concepts at key points in the plan development process.

Stakeholder groups engaged through surveys, focus groups and open houses included:

- Broader zoo staff
- Zoo volunteers
- Zoo Apprenticeship Program participants
- Oregon Zoo Foundation board members
- Community Advocacy Council
- Zoo members
- Frequent visitors
- Multiple community groups

Front-end evaluation was designed to inform the plan's initial development. Methods included three comprehensive, online surveys asking quantitative and qualitative questions of members and frequent visitors, zoo staff, and volunteers, as well as two virtual focus groups with the Oregon Zoo Foundation board. Results provided data on these stakeholders' ease of navigating the zoo, their favorite and least favorite habitats, zoo experiences they enjoy, which areas need improvement, needs for guest amenities, and other priorities for future investment.

During the plan development phase, a second and third round of engagement activities occurred over two weeks in May and August. The purpose of these formative activities was to gain feedback from a variety of stakeholder groups on the most recent Campus Plan designs.

Questions in the first series of engagement sessions were focused specifically on the topics of flow, pathways, amenity choices and features that promote access and inclusiveness. The formative evaluation methods included two open houses with table-top activities, three focus groups and an interactive session with youth from the Zoo Apprenticeship Program who used photography to illustrate their opinions.

The third round of engagement activities were designed to include many of the same groups that participated in the second round as well as an expanded group of members and frequent visitors. These activities and discussions focused on areas in which the planning team responded to previous feedback as well as a number of specific areas of study.

Overall, through all three phases of engagement, over 2,000 opinions were collected and considered.







Community engagement sessions

CAMPUS PLAN DRIVERS

The primary purpose of the early planning effort was to carefully evaluate the context of the existing zoo site, infrastructure, previously established strategic goals and new priorities. This critical period of review and reflection led to the establishment of the Campus Plan drivers that directed and informed design efforts for the remainder of the planning process.

Animal Wellbeing

The well-being of the animals residing at the Oregon Zoo is a critical driver for all elements of the Campus Plan. In addition to AZA standards and other industry guidance for habitat design, opportunities to enhance well-being through activity and choice were explored.

Some animals thrive best in habitats customized directly for their species' needs, while others may take advantage of sharing several more-flexible habitats with other species. All animals benefit from being provided choices within their environment – sun vs. shade, heating vs. cooling, variable eating and sleeping locations, visibility vs. privacy, and many other considerations.

Choice goes hand-in-hand with flexibility, which is an important element for all public-facing habitats as well as behind-the-scenes areas. Flexible habitats allow for optimal animal care, zoo population management, and consistent guest experiences.

Staff Wellbeing

Providing a meaningful staff experience is one of the focus areas identified in the Strategic Plan. A first step toward achieving this goal is addressing the need for more quality working spaces for staff members. Cramped and aging facilities around the zoo are a primary contributor to this issue. Proposed new projects include more generous and comfortable staff areas.

In addition, the primary central working spaces for the animal care team and facilities and maintenance team are in buildings that are approaching the end of their useful lives. This Campus Plan includes strategic development dedicated to replacing these facilities with expanded and improved modern structures. High quality working spaces for staff will support better communication, more flexibility to staffing and operations, a higher level of comfort, and most importantly a better representation of the value these individuals bring to the zoo community.



Elephant Lands activity tree in Forest Hall



Existing zoo circulation diagram

Circulation and Flow

Studies of existing guest and staff circulation revealed several areas in need of improvement. The primary challenges are in the Great Northwest, Pacific Shores and Africa zones, and the focus is on providing an equitable and fully accessible experience for all guests.

To achieve this goal, pathways must be widened to accommodate more guests, graded to achieve maximum slopes, and designed to support intuitive wayfinding. These guidelines will support flow throughout the campus that is navigable by all users.

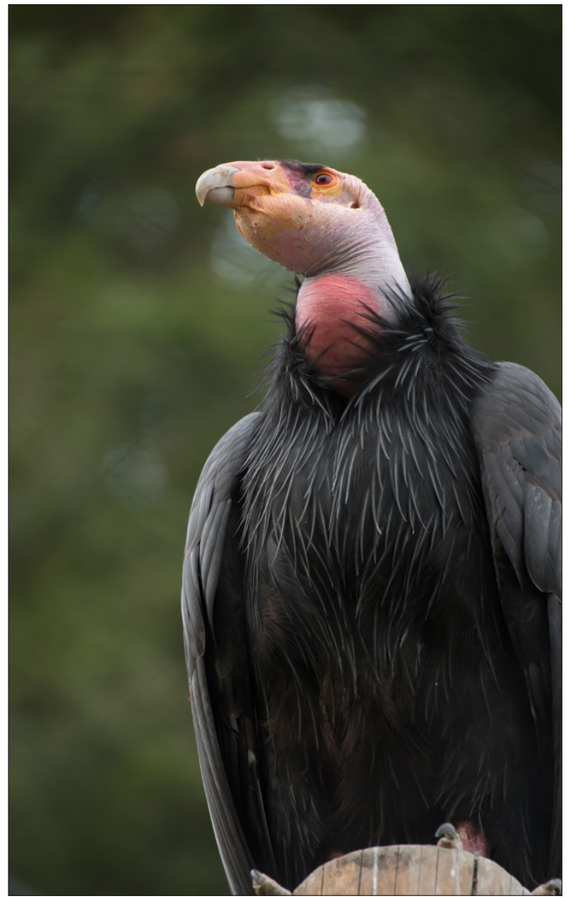
Another element of circulation and flow is to provide guests with more options for how they experience the zoo. Current paths, combined with steeply sloping topography, require guests to take long and strenuous routes to experience many of the zoo's popular attractions and animals.

This Campus Plan strives to provide additional options of varying lengths, and to reduce the physical demand by shortening overall walking distances and reducing the vertical elevation climb needed to exit from any point within the zoo. Increasing the accessibility, flexibility and choices available to guests will provide a more equitable experience for individuals of all abilities, whether they're visiting for a couple hours, a full day, or just want to visit the elephants each week!

Conservation Action & Education

Over the past 25 years, the Oregon Zoo has achieved some monumental wins for wildlife: helping prevent the extinction of the Oregon silverspot butterfly, tripling the range of the northwestern pond turtle in Washington, becoming the first institution to breed pygmy rabbits, starting a polar bear science revolution, launching a continent-wide effort to eliminate lead from the ecosystem, and helping the Yurok Tribe bring condors back to their ancestral homeland.

All of these efforts are part of bigger partnerships, but none of them would have been possible without the Oregon Zoo. As the biodiversity crisis intensifes, the zoo will leverage its facilities, expertise and partnerships to restore wildlife populations and promote human-wildlife coexistence. The zoo's diverse community is critical to the success of its conservation mission. The campus plan will draw the zoo community further into the collective conservation journey, sharing stories, offering hope and inspiring action for wildlife and the natural world.



California Condor

Guest Experience

Delivering an inspiring guest experience is another key focus area of the zoo's Strategic Plan. The improvements to circulation and flow discussed above will help in this effort, but a variety of other elements are informed by this key driver. Inspiring guests begins with amazing opportunities to view and experience thriving animals at all times of year. To this end, zoo care staff included animal visibility and climate suitability in their holistic evaluations. The collection of habitats proposed here supports a robust year-round experience with diverse animal experiences, great views, and many new ways to interact with animals and animal-care staff.

What happens in between animal-related experiences is also a critical element of this plan. The proposed layout includes many opportunities for guests to learn, rest, eat, play and decompress — all within the forest park environment of the Oregon Zoo. One important aspect of this effort is to make true hubs out of the major decision points by improving amenities and guest infrastructure at these locations. The location of these hubs was also assessed and reorganized to provide a better balance of amenities throughout the guest experience.

Operational Efficiency

Improving efficiency is critical for ensuring the campus plan supports continued sustainable operation for years to come. From day one of the planning effort, it became clear that future sustainability depends on prioritizing updates to the zoo's critical infrastructure.

Replacing facilities that have reached the end of their expected life reduces the effort and cost of increased maintenance down the road. In addition to physical structures, the organization of guest and staff flow across the campus is improved by including more generous clearances, direct service access to buildings and habitats, and clear routes of circulation.

The financial sustainability of the zoo requires a high degree of operational efficiency. In addition to the updates proposed around flow and access, improvements to guest amenity hubs are critical to enhancing this efficiency. The proposed hubs included in the campus plan are spaced evenly along the main circulation routes to provide consistent comfort for guests and revenue opportunities for the zoo. The hubs themselves include a focused collection of services including wayfinding, restrooms, dining options and retail, allowing for more centralized staffing and services.



Elephant Lands provides unique and inspiring experiences



Pollinator Garden conveys important conservation message

Campus Ecology

Campus Ecology is a term CLR uses to refer to the sustainable development and operation of a campus. Fundamentally, it is the long-term vision for showcasing the conservation, education and sustainability that guide the zoo's daily operations, policies and future projects. The zoo must holistically evaluate green design principles and ideas in terms of its unique climate, cultures, plants and animals to arrive at a unique collection of design directions.

The bar for future development at the Oregon Zoo is already set high by Metro's Sustainable Buildings and Sites policy, which provides standards for design, construction, operations and maintenance of all Metro properties, supporting the goals of reducing greenhouse gas emissions, eliminating priority toxic and hazardous substance use, reducing overall waste generation, reducing potable water use, and ensuring properties positively contribute to healthy urban ecosystems and watersheds.

Beyond the established policy, the Metro team participated in campus planning workshops to help establish a set of ambitious goals supported by the engineering team and the proposed development. The primary purpose of these goals is to ensure that the Oregon Zoo campus positively contributes to human and environmental well-being, conserves natural resources, and inspires sustainability practices by guests, community organizations and businesses. This will be achieved in part by pursuing the following specific goals:

- Eliminate campus operational carbon emissions by 2040.
- Reduce water use 35% by 2040.
- Promote ecological integrity and function in design of landscaping, stormwater systems and animal habitats.
- Go beyond the Sustainable Buildings and Sites policy and contribute to climate environmental justice outcomes in the region.
- Design zoo facilities and systems to be resilient in the face of climate change and other challenges.

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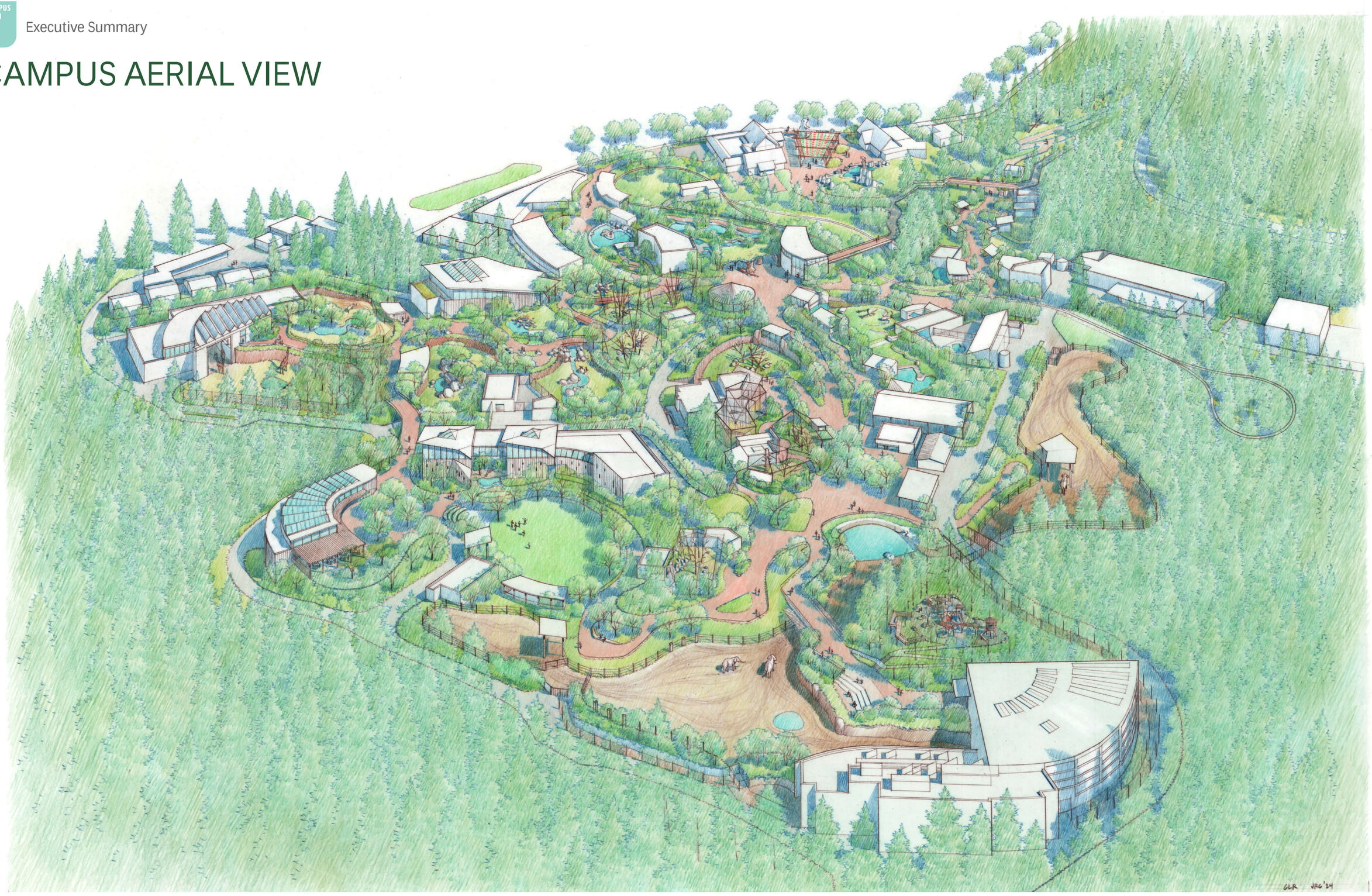
CAMPUS AERIAL VIEW



CAMPUS VISION

Existing Campus

The zoo is organized into three large zones including North America, Elephant Lands, and Africa. The non-public facing areas of the zoo are focused around the Facilities Hub in the southwest corner and the Animal Care Hub in the northeast.

ENTRY PLAZA
1. Gift Shop
2. Cascade Crest
3. Ticket Redemption
4. Train Round House

GREAT NORTHWEST
5. Mountain Goat Habitat
6. Mt. Goat & Black Bear Care Building
7. Pedestrian Bridge
8. Suspension Bridge
9. Black Bear Habitat
10. Snowy Owl Habitat
11. Covered Bridge
12. Eagle Habitat
13. Cascade Building
14. River Otter Habitat
15. Beaver Habitat
16. Waterfowl Aviary
17. Public Restrooms
18. Cougar Habitat & Building
19. Condor Habitat & Building
20. Family Farm Barn
21. Family Farm House

GATE J
22. Veterinary Medical Center
23. VMC Generator
24. Care, Connection & Conservation (C3) Building
25. Wildlife Live Building
26. Avian Reproduction Center Building

PACIFIC SHORES
27. Polar Bear Filtration Building
28. Polar Bear Care Building
29. Polar Bear Habitats
30. Boardwalk Path
31. Steller Cove Exhibit
32. Steller Cove Filtration Building
33. Penguinarium

PRIMATE FOREST
34. Chimpanzee Habitat
35. Chimpanzee Care Building
36. Chimpanzee Mesh Habitat
37. Orangutan & Gibbon Care Building & Habitat

EAST HUB
38. Growlers Cafe
39. Storage Building
40. Public Restroom

ELEPHANT LANDS
41. Forest Hall
42. Elephant Habitats
43. Elephant Filtration Building
44. Lawn
45. Stage

AFRICA
46. Aviary Cafe
47. Vollum Aviary
48. Predators of the Serengeti Building
49. Cheetah Habitat
50. Cheetah Care Building
51. Painted Dog Habitat
52. Painted Dog Care Building
53. Lion Habitat
54. Lion Care Building
55. Black Rhino Habitat
56. Black Rhino Care Building
57. Tortoise & Pygmy Goat
58. Savanna Habitat
59. Hoofstock Barn
60. Giraffe Feeding Station
61. Giraffe Care Building
62. Tree Tops Building & Boardwalk
63. Butterfly Lab
64. Sankuru Trader
65. Rainforest Building
66. Africa Rainforest Aviary
67. Kongo Ranger Station
68. ASC Otter Care Building
69. ASC Otter Habitat
70. Bat Cave

GATE A
71. Facilities & Maintenance Offices
72. Horticulture, Welding, & Autoshop
73. Animal Nutrition Center
74. Greenhouse
75. Compost & Waste Disposal
76. Custodial Building
77. Hay Barn

DISCOVERY ZONE
78. Administrative Center
79. Education Center
80. Classrooms
81. Overnight Camping Deck
82. Train Station
83. Red Panda Habitat & Building
84. Tiger Habitat & Building
85. Carousel



clr DESIGN | Oregon Zoo Together for Wildlife

Proposed Campus

The proposed campus plan maintains the overall organization of the zoo and focuses on strategic improvements informed by the key drivers identified by the planning team.

ENTRY PLAZA
1. Gift Shop
2. Guest Services
3. Ticket Redemption
4. Train Round House

GREAT NORTHWEST
5. Mountain Goat Habitat & Care Building
6. Pedestrian Bridge
7. Owl Habitats
8. Owl Care Building
9. Animal Habitat
10. Animal Overlook
11. Eagle Habitat
12. Covered Bridge
13. Animal Habitat
14. Black Bear Care Building
15. Black Bear Habitat
16. Public Restroom
17. Cougar Habitat & Building
18. Condor Habitat & Building
19. River Otter Habitat
20. Otter & Beaver Care Building
21. Beaver Habitat
22. Freshwater Exhibit Building
23. Filtration Building

ANIMAL CARE HUB
24. Veterinary Medical Clinic
25. Animal Care Offices
26. Flexible Holding & Support
27. Avian Holding & Support

COASTAL SHORES
28. Filtration Building
29. Polar Bear Care Building
30. Polar Bear Habitats
31. Seal Habitat
32. Sea Otter Habitat
33. Aquatic Support, Care, & Filtration Building
34. Penguin Care Building & Habitat

CENTRAL HUB
35. Guest Services
36. Carousel

PRIMATE FOREST
37. Chimpanzee Habitat
38. Chimpanzee Care Building
39. Chimpanzee Mesh Habitat
40. Orangutan And Gibbon Care Building & Habitat

EAST HUB
41. Event Shelter
42. Growlers Cafe
43. Storage Building
44. Dining Shelter
45. Public Restroom
46. Adventure Play

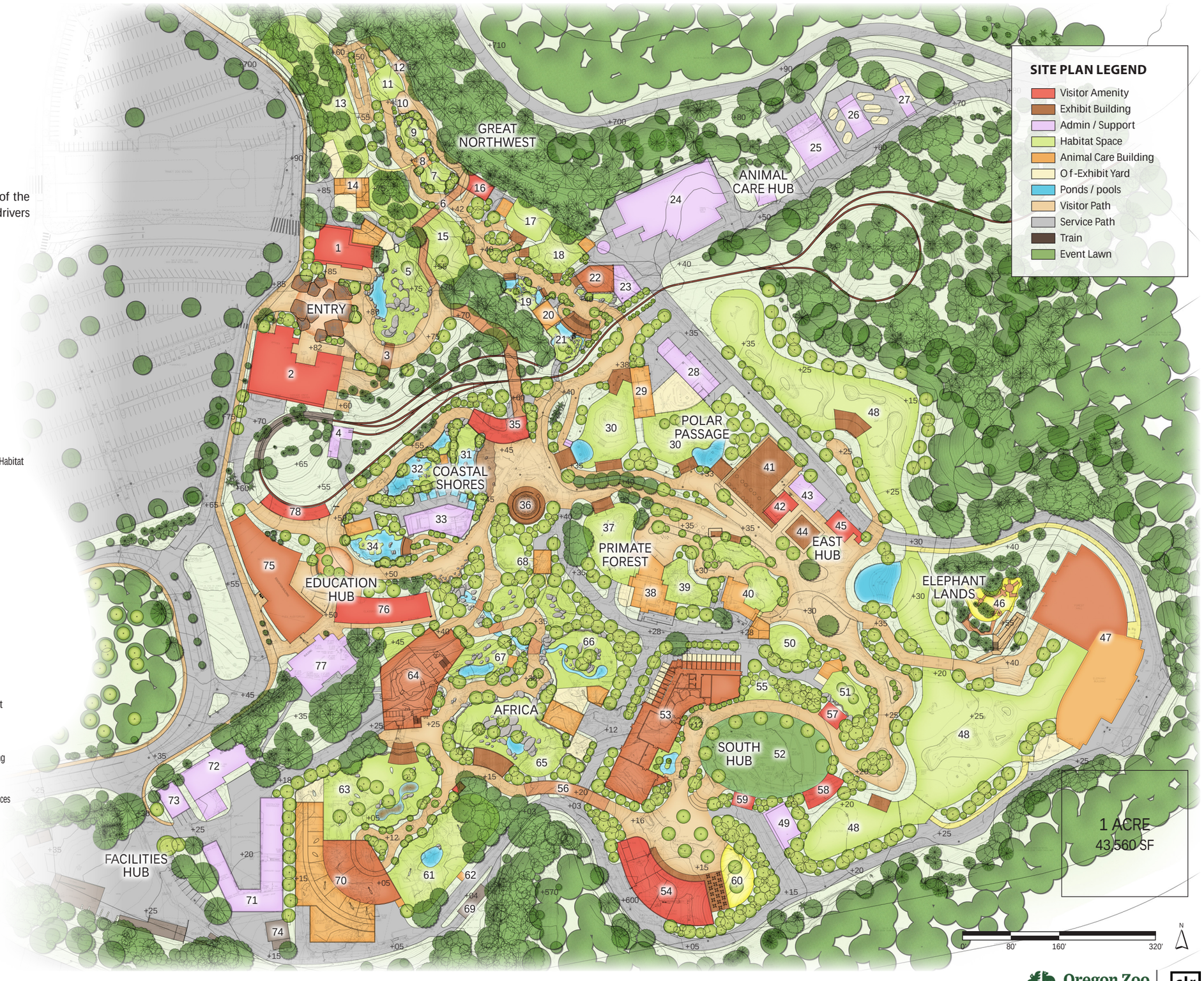
ELEPHANT LANDS
47. Forest Hall
48. Elephant Habitats
49. Filtration Building t

SOUTH HUB
50. Primate Expansion Care Building & Habitat
51. Red Panda Care Building & Habitat
52. Lawn
53. Ambassador And Herpetarium
54. Restaurant
55. Play Area
56. Bridge
57. Public Restrooms
58. Event Shelter
59. Stage
60. Play Area

AFRICA
61. Giraffe Habitat
62. Bird Care Building
63. Rhino Habitat
64. Tropical Forest Building
65. Lion Care Building & Habitat
66. Painted Dog Care Building & Habitat
67. Marsh Care Building & Habitat
68. Primate Care Building & Habitats
69. Butterfly Lab
70. Rhino/Giraffe Care & Exhibit Building

FACILITIES HUB
71. Facilities/Maintenance Shops & Offices
72. Animal Nutrition Center
73. Greenhouse
74. Hay Barn

EDUCATION HUB
75. Education Building
76. Classroom Building
77. Administration Building
78. Train Station



PHASING & IMPLEMENTATION

The implementation of a long-range campus plan is a complex and multifaceted endeavor that requires a carefully crafted approach. This campus plan encompasses a wide range of projects, objectives, and stakeholders, each with its unique challenges and dependencies. The implementation plan outlined here serves as a roadmap, summarizing milestones, timelines, and resources needed to realize the vision of the campus plan.

The primary aim of this planning exercise is to provide structure and clear direction, breaking the long-term vision into manageable phases and projects. This approach facilitates continuous progress tracking, simplifying the identification of next steps and ensuring steady progress towards the campus plan goals. Another important aspect of this implementation plan is its support for the efficient allocation and optimization of Metro and Oregon Zoo resources, including financial, human, and material, throughout the lifespan of the plan.

Much like the campus plan itself, the implementation plan is designed as a living document, adaptable to changes and unforeseen challenges. In a long-term project such as this, flexibility is key, as economic, environmental, and social landscapes evolve over time. The ability to adapt and modify the plan while maintaining focus on the goal is critical.

Many considerations are folded into the version of the implementation plan presented here, but some of the key discussions that lead to this plan include:

- Evaluation of project budgets and funding streams.
- Ability to maintain a great Oregon Zoo experience while updates take place.
- A focus on addressing critical needs for animals, guests, staff, and physical infrastructure.
- Balancing the overall investment between animal experiences, sustainable infrastructure, and guest services.

2024 Campus Plan Projects	Estimated Budget	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Plaza Enhancements (Entry, East Hub)	$19M														
Coastal Shores	$79M														
Africa Phase 1 (Savanna, Predator)	$109M														
South Hub (Restaurant, Herpetarium, Event Lawn)	$113M														
Africa Phase 2 (Primate)	$31M														
Projects of Opportunity or Beyond 15 years															
Destination Play	$5M														
Asia	$19M														
Gate A	$22M														
Gate J	$23M														
Great Northwest	$53M														
Tropical Forest	$63M														

** Note that estimated budgets presented above for 2024 Campus Plan Projects include escalation to the midpoint of construction, while Projects of Opportunity are presented in 2024 dollars as escalation will depend on sequence and schedule.*


ENTRY PLAZA
COASTAL SHORES
POLAR PLAZA SHELTER
PRIMATE
PREDATOR
AFRICA
HERPETARIUM / AMBASSADOR
LAWN
SOUTH HUB
SAVANNA
SOUTH HUB RESTAURANT
1 ACRE
43,560 SF
0'
80'
160'
320'
N

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SUSTAINABLE ZOO

Metro and the Oregon Zoo have a unique and powerful role to advance sustainability, climate justice, and resilience in alignment with Metro's values and the commitments the agency has made to the public.

As a regional government committed to promoting sustainable communities, Metro also strives to make its own operations sustainable. With an extensive portfolio of buildings, including the Oregon Zoo and other visitor venues, parks, office buildings and solid waste facilities, and serving millions of visitors and customers each year, Metro has a significant opportunity to reduce its impacts and advance positive progress on the region's quality of life. To that end, in 2003, the Metro Council set an ambitious vision for business operations to be sustainable within one generation, by 2025. The Council adopted goals in five key categories: climate, waste, toxics, water, and habitat, and adopted a Sustainability Plan in 2010 that identifies strategies and actions to achieve these goals.

In 2010, Metro named sustainability as one of Metro's central values:

> We are leaders in demonstrating resource use and protection. We are leaders in demonstrating resource use and protection in a manner that enables people to meet current needs without compromising the needs of future generations, and while balancing the needs of the economy, environment, and society.
>
> Metro's Strategic Framework, adopted in 2021 to guide Metro's decisions and priorities, identifies racial justice, climate justice and resilience, and shared prosperity as guiding principles.

Sustainability at the Oregon Zoo

The Oregon Zoo aspires to be a model of sustainability by putting conservation of natural resources at the forefront of its daily operations and planning for future improvements. The Oregon Zoo has been leading by example for many years. Conservation is in the zoo's mission, and the zoo works on a range of issues around the world.

In alignment with these values and goals, the Oregon Zoo Campus will be designed to positively contribute to human, animal, and environmental well-being, to conserve natural resources and to lead and inspire sustainable practices by guests, community organizations, and businesses.

The campus planning process provides an opportunity to reflect on the current state of the campus, as well as to look forward to the opportunities and challenges ahead. This section focuses on sustainable and resilient design and operation including greenhouse gas emissions, water management, habitat and stormwater, and resilience planning for extreme weather events and disruptions beyond the zoo's control. In this section we look at the 2010 Metro and zoo sustainability goals, the current state of progress toward those goals, and set new goals for the coming decades.

Several campus wide strategies are highlighted in the plan including a movement away from fossil fuel use on campus, minimizing urban heat island effect, and reusing water onsite. A more detailed summary of the analyses performed during the campus planning process is included in the appendix.



Green stormwater facility at Polar Passage

METRO GOALS FOR SUSTAINABLE ZOO

Metro Sustainable Buildings & Sites Policy

Metro's Sustainable Buildings and Sites Policy sets inspiring goals for Metro properties, many of which apply to the zoo. A summary of this policy and its implications for the zoo is included in the Appendix. Some of the signifcant policy elements that will pertain to the zoo include:

- All new buildings over 2,000 SF and $1M in total project cost will meet the Core and Zero Carbon certifcations.
- New projects will use materials with low embodied carbon content.
- All projects will meet bird-friendly design guidelines.
- No new fossil fuel infrastructure and campus will move toward electrifcation of buildings and feet.
- New structures will be designed for climate resilience.

Oregon Zoo Sustainability

The Oregon Zoo will seek opportunities to go beyond the Metro Sustainable Buildings and Sites Policy to design buildings and spaces to contribute to climate environmental justice outcomes in the region and provide healthy, accessible, welcoming spaces where staf and visitors thrive.

The Oregon Zoo Campus will be designed to positively contribute to human and environmental wellbeing, to conserve natural resources and to lead and inspire sustainability practices by guests, community organizations and businesses.

CLIMATE

Eliminate greenhouse gas emissions from zoo operations by 2040 and prioritize actions that contribute to reduced regional greenhouse gas emissions.

GUIDING PRINCIPLES

- Reduce energy demand frst
- Prioritize strategies that contribute to regional grid decarbonization
- Consider the climate impacts of a building through its entire lifecycle
- Minimize urban heat island efect
- Demonstrate and provide education on key climate solutions

STRATEGIES AND ACTIONS

- Electrify the zoo campus: design new buildings to be all-electric and electrify existing buildings over time as they are retrofitted
- Install electric vehicle charging infrastructure (and electrify feet)
- Design new exhibits for energy exchange between buildings with opposing loads, when feasible
- Choose low carbon materials and natural carbon solutions in landscape and exhibit design
- Pursue active and passive renewable energy
- Conduct total cost of ownership analysis when choosing mechanical systems
- Implement energy management information systems across the campus (to allow for tracking and informing energy efciency)
- Pursue strategies to reduce urban heat island efect such as cool roofs, green roofs, cool pavement, and landscape design
- Sub-meter every building/exhibit gas and electricity usage. Collect, store, and trend data electronically in a single location that is accessible to the zoo and Metro.

MEASURABLE TARGETS

- Reduce energy use per visitor to 25% below 2023 baseline by 2030
- Design buildings to achieve at least a 70% reduction in total energy use compared to an Architecture 2030 (or existing zoo) baseline building
- Generate 35% of total electricity use across the zoo campus with onsite renewable energy on an annual basis by 2040
- Maintain 100% renewable electricity
- Achieve a fossil-free, all-electric campus by 2040

WATER

Reduce municipal water use by 35% from 2023 baseline by 2040 by eliminating water waste, increasing water efficiency, and reusing water onsite.

GUIDING PRINCIPLES

- Reduce demand for water frst
- Design landscaping to minimize the need for irrigation
- Reclaim and reuse water onsite to minimize the need for municipal water
- Eliminate water waste through leak detection, increased efciency, and monitoring
- Demonstrate and educate visitors about water conservation, efciency, and reuse systems

STRATEGIES AND ACTIONS

- Include rainwater harvesting in all new buildings
- Collect and use stormwater to supply water needs for exhibits and pools
- Eliminate dump and fll pools and upgrade exhibits with modern fltration systems
- Establish water tracking and reporting systems to better monitor water use
- Install smart irrigation in all exhibits and landscaping
- Design exhibits to reduce water use for exhibit washdown (e.g., integrate soft substrate into exhibit and holding areas)
- Install WaterSense faucets and fxtures
- Sub-meter every building/exhibit/landscape water use. Collect, store, and trend data electronically in a single location that is accessible to the zoo and Metro.

MEASURABLE TARGETS

- Achieve 2/3 of water needs for exhibits and pools from stormwater runof collection and reuse by 2040
- Design buildings to achieve at least a 50% reduction in water use compared to a baseline building
- Reduce water use for irrigation by 50% by 2040
- Reduce water leaks by 75% from 2023 baseline by 2040

HABITAT AND STORMWATER

Promote ecological integrity and function in design of landscaping, stormwater systems, and animal habitat while respecting unique geologic constraints.

GUIDING PRINCIPLES

- Model habitat-friendly development practices that contribute to ecological integrity and provide multiple benefits
- Utilize green infrastructure whenever possible to support healthy ecosystems

STRATEGIES AND ACTIONS

- Use pervious pavement wherever feasible
- Use native and adaptive species to reduce the need for irrigation, pesticides, and maintenance
- Create local habitat for pollinators, birds, and native species across the campus and provide spaces for visitors/multiple benefits
- Incorporate green roofs where feasible to sequester carbon, filter pollutants, create habitat, absorb heat, and insulate buildings
- Install rain gardens to filter pollutants, and reduce erosion and urban heat island effect
- Conserve and restore native plant communities around undeveloped, natural campus land
- Create educational opportunities to showcase the benefits of habitat-friendly development

MEASURABLE TARGETS

- Reduce effective impervious area by 20% compared to 2023 baseline
- Create a living classroom in each quadrant of the zoo

RESILIENCE

Design zoo facilities to survive and maintain critical functions in the event of extreme weather events exacerbated by climate change, earthquake activity, supply chain disruptions, energy outages, and public health emergencies.

GUIDING PRINCIPLES

- **Anticipate** – Understand and document potential threats and disruptions
- **Absorb** – Design systems and facilities to withstand, defect, or otherwise accommodate stresses and disruptions with minimal failure or planned, safe failure
- **Adapt** – Identify and modify existing structures and facilities that are vulnerable to anticipated stresses and disruptions
- **Recover** – Develop relationships, plans, and procedures to restore systems and facilities to full functioning after a disruptive event

STRATEGIES AND ACTIONS

The resiliency strategies and actions should be determined by conducting a comprehensive resiliency plan study. The plan should investigate strategies related to the following considerations at a minimum:

- Energy
- Water
- Stormwater
- Heat
- Windstorm
- Fire
- Smoke
- Earthquake
- Landslide
- Internet disruption
- Food

MEASURABLE TARGETS

The specific needs and targets should be determined by conducting a comprehensive resiliency plan study. The plan should investigate targets related to the following considerations at a minimum:

- **Expanded Opportunities and Aspirations:** The zoo can maintain all functions, not just critical functions, and can extend support to the local community during disruptive events.

SUMMARY OF PROGRESS FROM THE LAST 10 YEARS

The 2010 Metro Sustainability Plan laid out specific and ambitious goals for both greenhouse gas (GHG) emissions and water use reduction. These goals informed and were adopted by the 2011 Oregon Zoo Comprehensive Capital Campus Plan (CCCP). The greenhouse gas reduction goals were staged over a 40 year timeline from the 2008 baseline emissions as follows:

- 2013 – Arrest GHG Emissions
- 2020 – 25% Reduction
- 2025 – 40% Reduction
- 2050 – 80% Reduction

The 2011 Oregon Zoo CCCP identified potential strategies to reduce emissions including energy efficiency, utilizing a ground-source heat pump condenser loop, biomass boilers, solar PV, solar thermal, and green power purchase from the utility. Some of these strategies were employed in the subsequent bond projects, when determined to be appropriate and cost effective. In 2022, zoo emissions associated with natural gas and electricity totaled approximately 3600 MT CO2e – an approximately 25% reduction in GHG emissions compared to the 2009 baseline. Natural gas consumption has been reduced by ~9% from the baseline while electricity consumption increased by ~3% (note that the bond projects have added significant energy consuming program area and LSS systems to the campus). The reduction in total greenhouse gas emissions is due in part to the reduction in campus natural gas consumption but even more so by the reduced emissions associated with electricity generation in 2023 compared to 2009. The reduced emissions associated with electricity generation is a key reason in the recommendation to replace natural gas consuming equipment with electric ("Electrification") presented in this campus plan as well as the zoo's decision to purchase 100% renewable electricity. Nevertheless, electric consumption should be reduced with efficient equipment such as heat pumps, managed against peak utility demands, and offset with onsite renewable generation to the extent practical. All of which are presented in this campus plan.

The 2010 Metro Sustainability plan identified water use reduction goals staged over a 15-year timeline from the 2009 water consumption as follows:

- 2013 – 15% Reduction
- 2020 – 30% Reduction
- 2025 – 50% Reduction

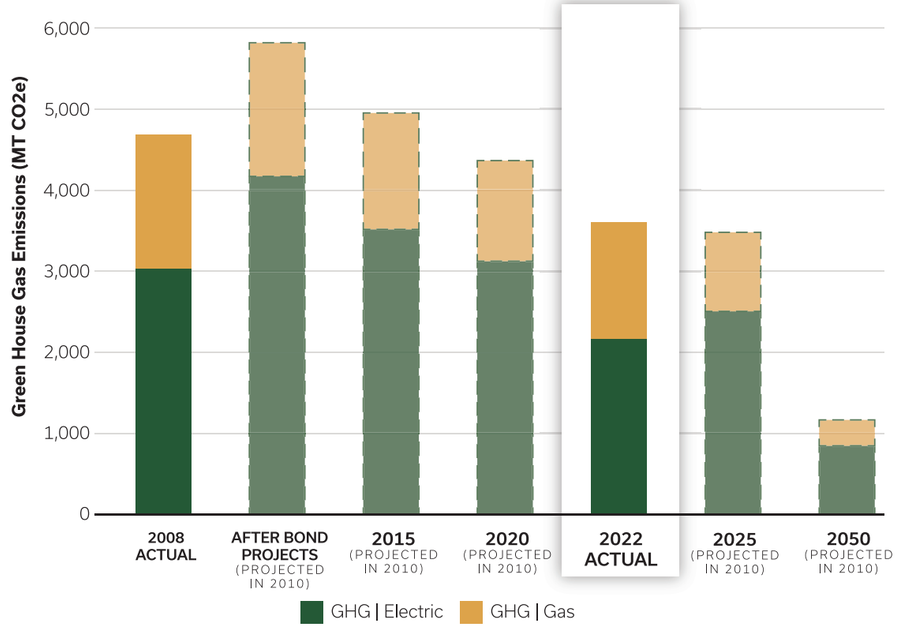
The 2011 CCCP took the water savings goals a step further and targeted a 60% reduction in water reduction by 2025. In 2022 the zoo consumed approximately 37 Million Gallons of water – a 56% reduction from the baseline consumption of 85 Million gallons. The zoo has already achieved Metro's 2025 goal for water use reduction and is very near to achieving the 60% CCCP goal with 3 more years to go. Water savings is the result of water efficient exhibit systems at elephants and polar bear, replacement of aging and leaking infrastructure, and rainwater capture and reuse systems at elephants and the Education Center. Approximately half of the current water consumption is associated with exhibit usage and reduction strategies will be most effective by targeting exhibit usage, though other non-potable demands such as restrooms and irrigation also offer significant opportunities for water savings.

UTILITY	AVERAGE ANNUAL USE		
	2008	2022	% Change
Electricity	7,393,000	7,634,000	+3%
Natural Gas	306,000 therms	277,000 therms	-9%
Water/Server	84.8 million gallons	38 million gallons	-55%

Notes: Since 2008 the zoo has significantly expanded indoor and habitat. Electrification of heating systems has nevertheless led to an overall reduction in gas consumption with only a slight increase in overall electric consumption.

Water consumption has been drastically reduced via water saving pool systems, rainwater reuse, and infrastructure improvements.

EMISSIONS REDUCTION PLAN FROM 2010 CAMPUS PLAN



The 2010 Campus Plan projected future zoo emissions up to the year 2050 beginning with the 2008 emissions baseline. It was expected that emissions would increase as new buildings and habitats were constructed with the bond. Emissions were projected to decrease over time as campus efficiency measures were implemented along with on site renewable sources and cleaner electricity from the utility. The overall 2022 actual emissions are consistent with the 2010 project.



37.5
MILLION GALLONS

56%
REDUCTION FROM 2008 EXCEEDS METRO'S GOAL

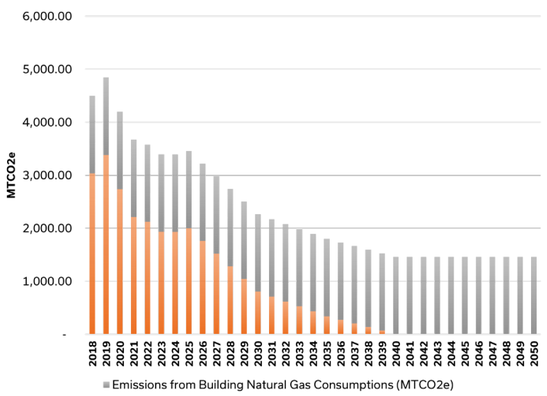
A PATH TOWARDS ELECTRIFICATION

Since one of the most impactful transitions buildings can make to reduce their operating emissions is to shift to high performance, all-electric systems, a path toward electrification is one of the key tenets of the Oregon Zoo sustainability work.

KEY FINDINGS

- Oregon has a state policy requiring the state's electric utilities to achieve zero operating emissions by 2040.
- By shifting to all-electric systems, buildings will benefit from the decarbonization of the grid. Building operating emissions will reduce in connection with grid emission reductions if all systems are electrically based.

BASELINE: YEARLY OPERATING EMISSIONS

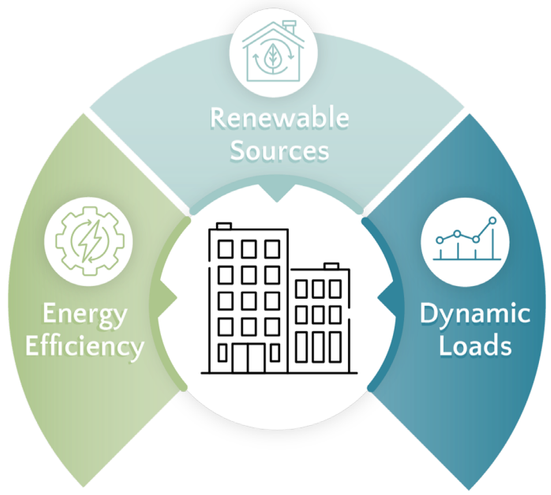


Grid-Interactive Efficient Buildings (GEBs)

Implementing grid-interactive efficient buildings and flexible loads has the potential to be one of the most impactful sustainability measures the Oregon Zoo can implement.

KEY FINDINGS

- Load flexibility and demand reduction can help reduce operating emissions and operating costs.
- There are multiple programs available through PGE to help incentivize and support participation with grid-interactive systems, including demand response schedules and onsite batteries.
- Reducing energy demand during peak times helps support a more sustainable, resilient grid.



INTERACTIONS WITH THE GRID

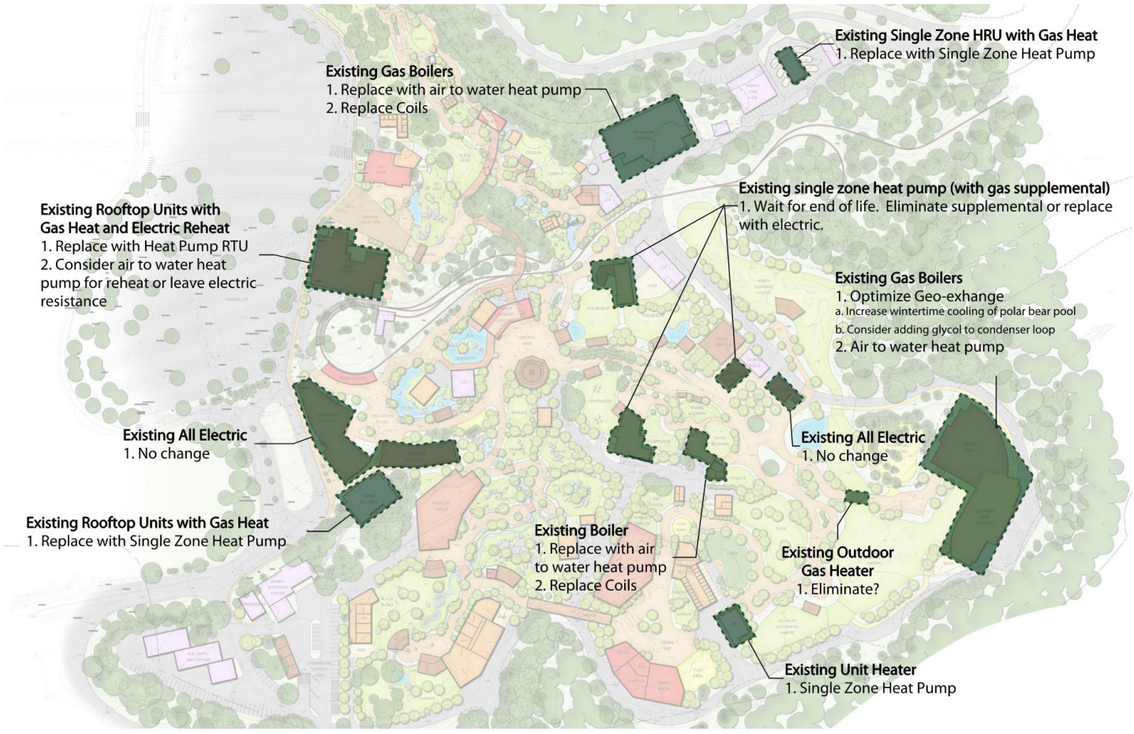


New Construction Electrification

All new buildings will be designed to use high efficiency all-electric system for all end uses.

Existing Building Electrification

Existing buildings which are not demolished as part of the current campus plan (e.g. recent bond projects) will need to be evaluated for natural gas equipment replacement. Existing buildings can present a greater challenge to electrification than new buildings due to limitation in space, structural capacity, and especially electrical capacity. A complete campus inventory of all campus gas equipment, the timeline for equipment (or building) replacement, and the available electrical capacity at the location of the gas equipment will be required to produce a detailed electrification plan for all existing buildings.



KEY FINDINGS

Prioritization of electrification projects should be based on:

- Deferred Maintenance - Replace gas equipment at end of life
- Return on investment - Replace gas equipment that results in highest operational cost to project first cost ratio.
- Carbon Reductions - Replace gas equipment that results in the highest carbon emissions to project first cost ratio.
  - Including a dollar valuation of carbon emissions would allow items 2 and 3 to be combined in a single return on investment metric

KEY FINDINGS

Electric replacements of specific gas equipment include:

- Replace single zone units (unit heaters, gas fred roof top units) with single zone heat pumps (split systems, heat pump roof top units).
- Replace gas boilers with air to water heat pumps (may require equipment coil replacements to accommodate lower supply temperature.
- Replace domestic water heaters with air to water heat pumps.
- Replace gas kitchen equipment with electric equivalent (induction where available).

CAMPUS ENERGY SYSTEMS

District Thermal Loop

There are unique opportunities that come forward at the campus scale. Options like district systems and shared resources across multiple areas were evaluated as part of this study.

KEY FINDINGS

- Expansion of the ground source well system throughout the entire campus is not recommended, or necessary. Air source heat pumps are anticipated to provide an e f cient electric heat source for most needs of the campus.
- There might be opportunities for localized district thermal energy systems within small building clusters that have simultaneous heating and cooling loads. For example, the signi fcant cooling loads of the penguin and sea otter could create an energy sharing opportunity with the heating needs of the Forest Pavilion.

Refer to the Appendix for additional information.

Campus Renewables

KEY FINDINGS

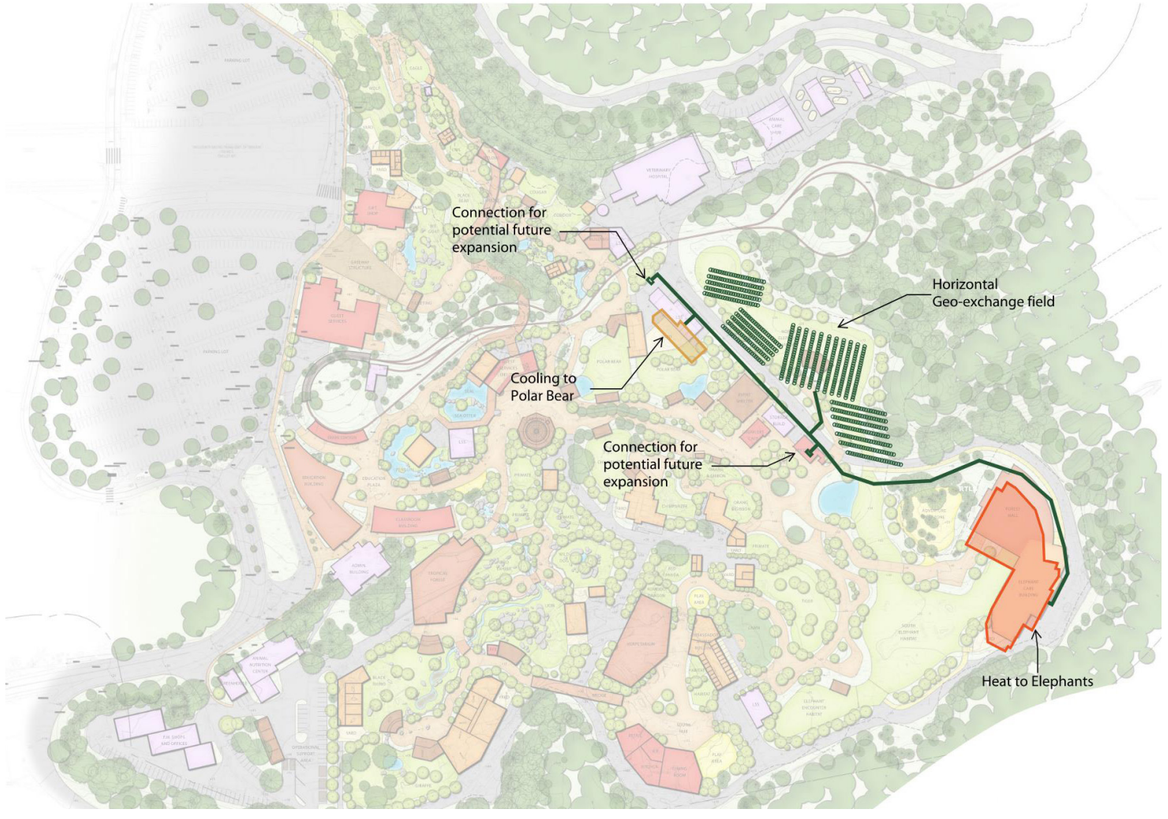
Incorporating renewables on the campus helps achieve three main goals:

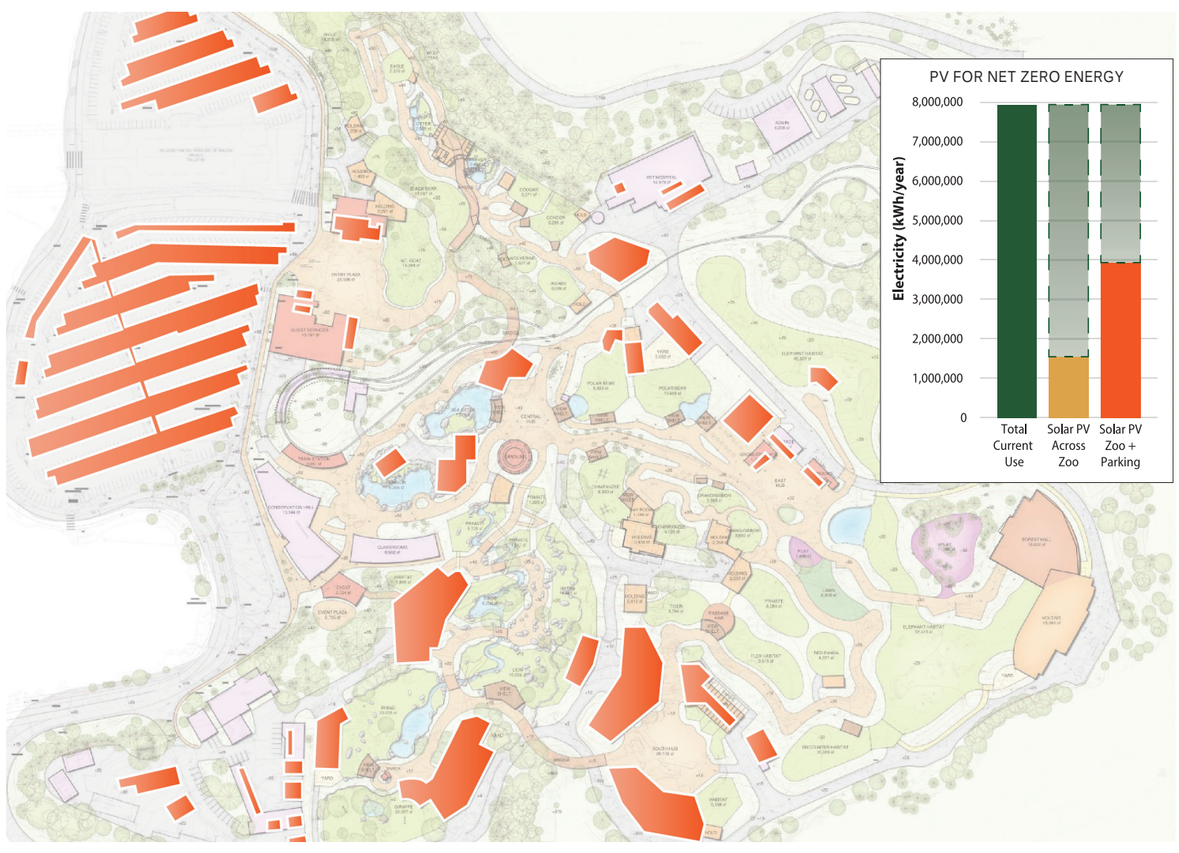
- Reduced operating costs
- Reduced operating emissions
- Visitor education tool

The most cost-e fective and best suited onsite renewable energy technology is photovoltaic (PV) panels. New and existing roofs with adequate solar access can bene ft from the additional of PV panels.

The opportunity with the most potential is the parking lot. Incorporating PV parking canopies would greatly increase the onsite generation potential, which could provide both sustainability and energy resilience bene fts. This also creates a memorable visitor entry experience with a vast PV array being the f rst element of their entry experience. Additionally, it provides protection from weather for visitors loading families in and out of vehicles. This solution will require collaboration between the multiple jurisdictions with ownership of these facilities, but the potential bene fts make this a worthwhile conversation to continue.

Refer to the Appendix for additional information.





DESIGNING FOR ENERGY RESILIENCE

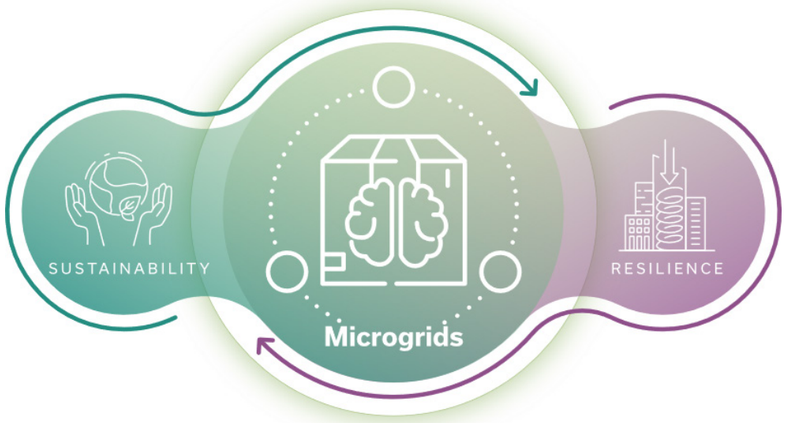
Discussions of energy resilience have become increasingly important as regions grapple with the increase in extreme weather events. The Oregon Zoo is not spared from this challenge it has experienced snow, rain and heat events in recent years beyond what was previously considered normal. Electricity and natural gas supply and distribution can also be impacted by these events which can affect their ability to deliver consistent, reliable energy.

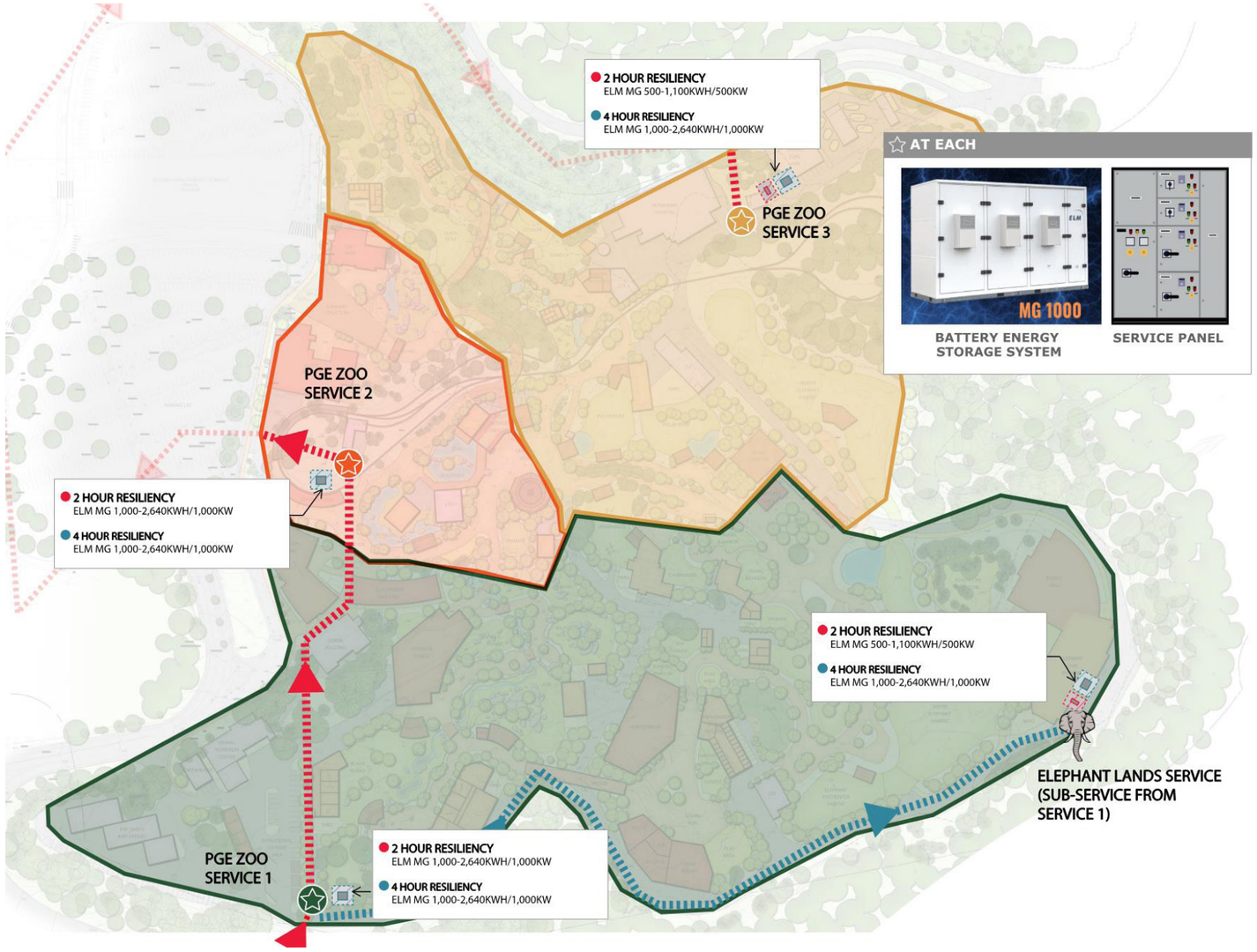
KEY FINDINGS

- A benefit of the zoo's long term goal of transitioning to an all-electric campus is that electricity is the primary source of energy that can be locally generated and stored. Electricity can be generated onsite with photovoltaic (PV) panels and stored in battery energy storage systems (BESS) to create a localized energy source that can self generate indefinitely. Fossil fuel reliant systems such as natural gas utility service and diesel generators are dependent on outside inputs to keep these systems running.
- A consideration with a PV and BESS resilience system is that the battery system size needed to support a long term outage during winter (i.e. low solar production) will likely be size and cost prohibitive. Although a long duration outage is possible, a review of the historic outage history at the Oregon Zoo found that the majority of outages are four hours or less.
- Therefore, the best solution is likely a hybrid approach with PV+BESS and diesel generators. The PV and BESS can support the more frequent short term outages minimizing the emissions and cost associated with operating the diesel generators. The generators can be reserved for only the more catastrophic events, like a major earthquake.
- Initial analysis of the historic loads found that a 1000kW/2500kWh BESS associated with each existing PGE service would be adequate to provide 4-hours of backup to each region.
- For the generators, the zoo's current use of renewable diesel helps reduce emissions and should continue to be utilized.
- In addition to energy resilience, the most important contribution of the BESS is its ability to be a grid-interactive flexible load. In this scenario, the BESS is used during normal grid operations as a grid support resource to improve grid stability and even accelerate grid decarbonization, as discussed in the Electrification section. This is perhaps one of the most important sustainable measures the zoo could implement.

By integrating onsite renewables with storage the Oregon Zoo will be able to implement a campus microgrid. This will provide both sustainable and resilience energy solutions to the site.

Refer to the Appendix for more information on grid-interactive solutions.





THE PATH TOWARDS HOLISTIC SUSTAINABILITY

WATER IS A PRECIOUS RESOURCE

The reduction in water use at the zoo since 2008 is a major success story. With a continued commitment to responsible use, including onsite reuse, the zoo can demonstrate through action that water is a precious resource. Additionally, the zoo has an opportunity with the new campus vision to rethink the role rainwater has within the campus's water story. By capturing, treating and storing the water that falls on the site annually, there is potential to reduce the imported water needs of the campus.

KEY FINDINGS

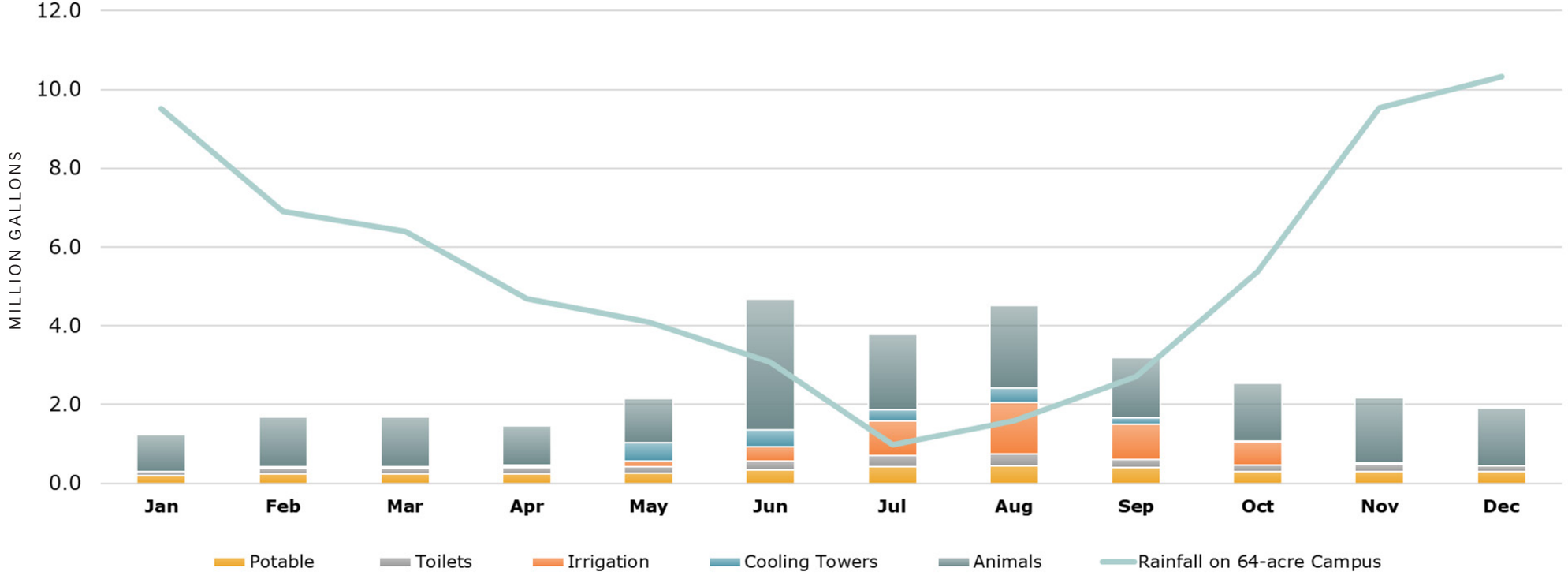
- Since exhibit usage is the largest component of the total, strategies to reduce this use category, including storm water capture and reuse offer the largest water use reduction opportunity.
- Reductions in other non-potable demand including irrigation and toilet flushing can have a significant impact.
- Potable demand is a relatively small percentage of total zoo water use (10%); therefore, an on campus treatment system to produce potable water is likely not practical due to maintenance and regulation implications. Yet considerations around water resilience will be further evaluated in the effort to develop the Comprehensive Resilience Plan.
- It is estimated that installing roughly 2.5 million gallons of rainwater storage could save 6 million gallons of water used for landscape, exhibits, and washdown areas.

Refer to the Appendix for additional information.

37.5
MILLION GALLONS

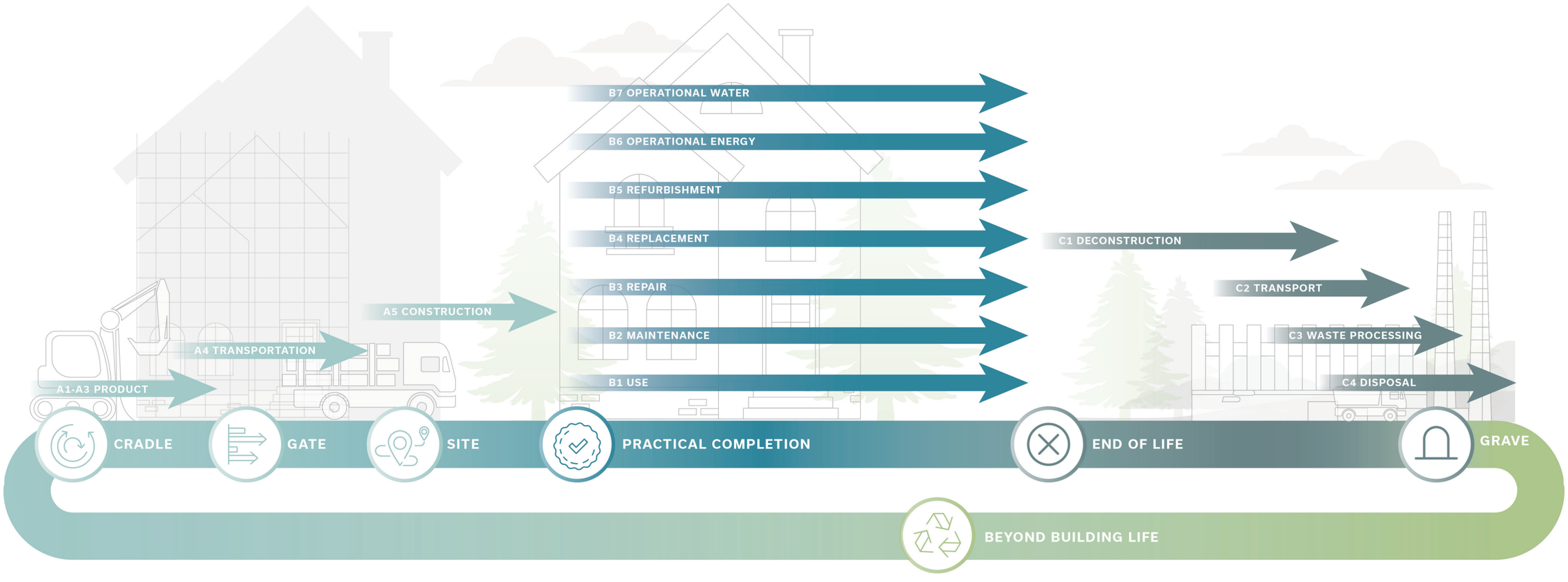
56%
REDUCTION FROM 2008 EXCEEDS METRO'S GOAL

CAMPUS WATER USE BY MONTH 2022



HOLISTIC EMISSIONS REDUCTION TARGET

Much of the emissions analysis at the zoo to date has focused on operating emissions - the emissions associated with operating the building during it's active life. In partnership with understanding the operating emissions, the zoo will expand it's view to also consider the embodied emissions of its work- that is to say, the emissions associated with building, maintaining, and deconstructing a building throughout its life. This includes the emissions associated with the materials, transportation, construction, and end-of-life disposal of the building. By taking a more in-depth look at all these factors, projects can better understand the interactions between these di f erent factors and further reduce the overall emissions impacts of the built environment.

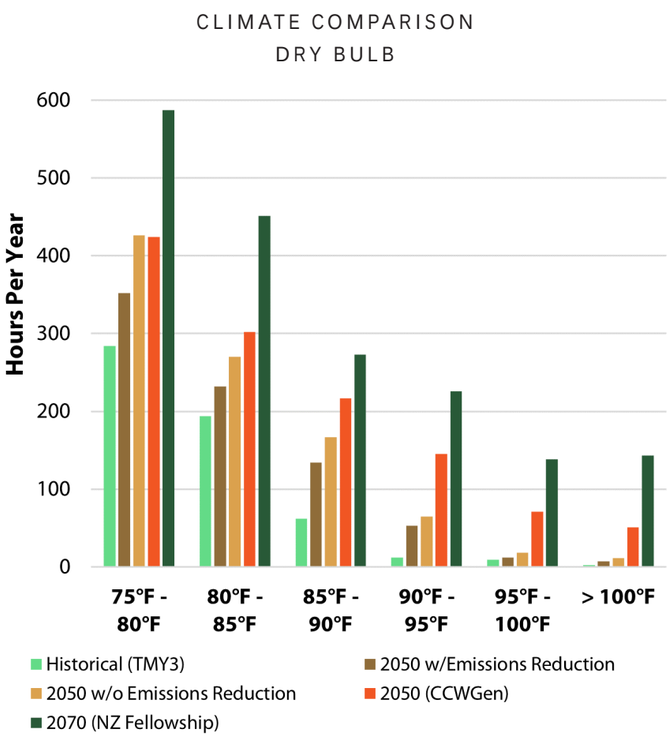


DESIGNING FOR CLIMATE RESILIENCE

Metro and the Oregon Zoo are committed to sustainable design to mitigate the zoo's contribution to greenhouse gas emissions and climate change. Nevertheless, climate change will continue to occur and future exhibit designs will need to anticipate the change. The following graph shows the number of hours the outside air temperature in Portland, Oregon exceeds 75°F over the course of a year. The light green bars are based on the historical average (1991-2005). The colored bars indicate several predictions for future outdoor temperature in Portland. Temperature predictions vary signi f cantly depending on whether global GHG emissions are reduced, and between the di f erent models. However, in all cases there are signi f cantly more hours above 90° F, and in two of the models, many more hours over 100°F.

For non-critical applications in the Portland area, cooling systems design typically assumes a peak summer time outdoor temperature of 91F. Based on the predictions for future climate, a cooling outdoor design temperature of 95°F is recommended. More critical applications, including life support systems, will need to be evaluated on a case by case basis and may warrant outdoor design conditions well over 100°F.

Designing cooling systems to accommodate warmer outdoor temperatures is only one component of the recommended Comprehensive Resiliency Plan to document strategies to mitigate risks associated with climate change, a Cascadia earthquake, and other disruptive events.



Historical (TMY3): *https://energyplus.net/weather*

2050 w/emissions reduction: *https://www.weathershift.com/*

2050 w/o emissions reduction: *https://www.weathershift.com*

2050 CCWGen: *a.https://energy.soton.ac.uk/ccworldweathergen/*

2020 NZ Fellowship: *https://www.energytrust.org/wp-content/uploads/2020/06/Download-research.zip*

METERING & VERIFICATION

Energy and water sub-metering is critical to understanding and managing energy and water use on campus. In addition to installing physical meters, the meter data must be stored and accessible in a useful location for the building owners and operators to easily see and understand. At the zoo, the Education Center is an example of a metering system that is well set up and utilized. Other buildings including polar bear and primates, have the physical meters installed, though the software is not set up so that the data is easily understandable or used. A comprehensive inventory of existing meters should be performed, meter data should be labeled, stored, and trended electronically in a single location that is easily accessible to and understood by the zoo and Metro. All future projects should be set up similarly.

A LOOK FORWARD ON THE CURRENT PATH

A key tenant of the electrification movement is that through technology advances, economic benefits of renewable energy and state mandates the electric grids are in steady trending towards reductions in operating emissions. This "greening of the grid" translates to operating emissions reduction on everything that it serves, including buildings.

As the PGE grid trends towards this zero carbon state, the zoo's electricity related operating emissions will follow. Over time, this current emissions source will become zero.

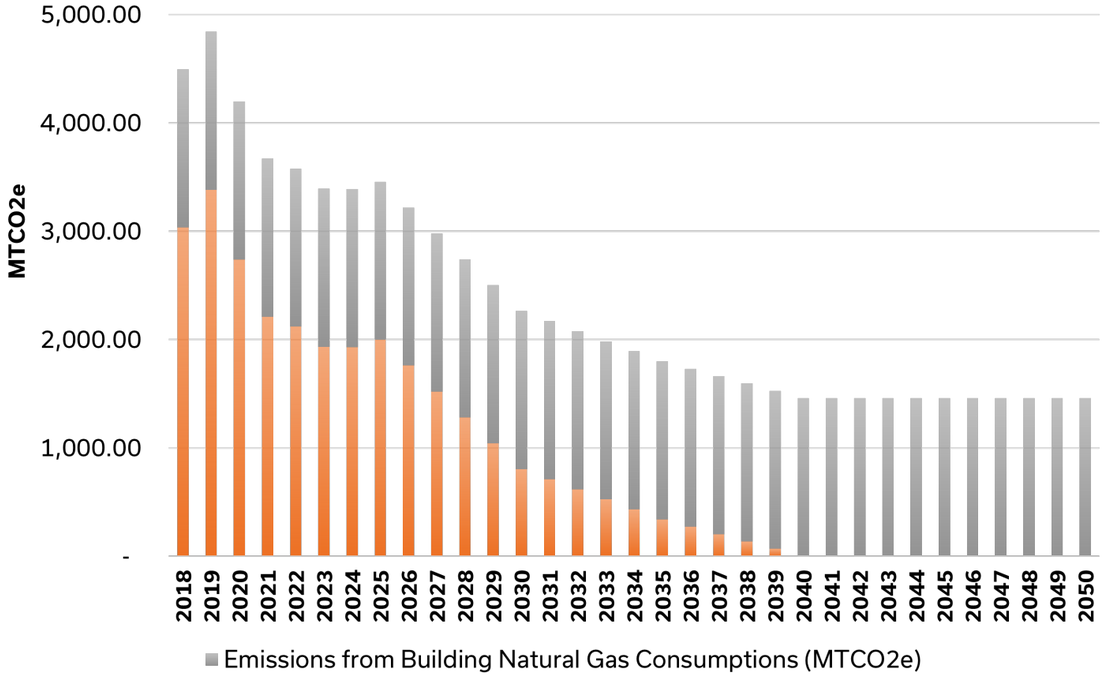
By comparison, natural gas- also known as methane gas or fossil gas- will always have emissions associated with it due to being a fossil fuel. By 2030 the natural gas on the campus will become the main source of operating emissions on campus and by 2040 it will be the only source.

Note: Alternate methane sources, such as an onsite anaerobic digester, were considered as part of this campus plan but were found to not be viable for this site. Refer to the appendix for additional details regarding the study.

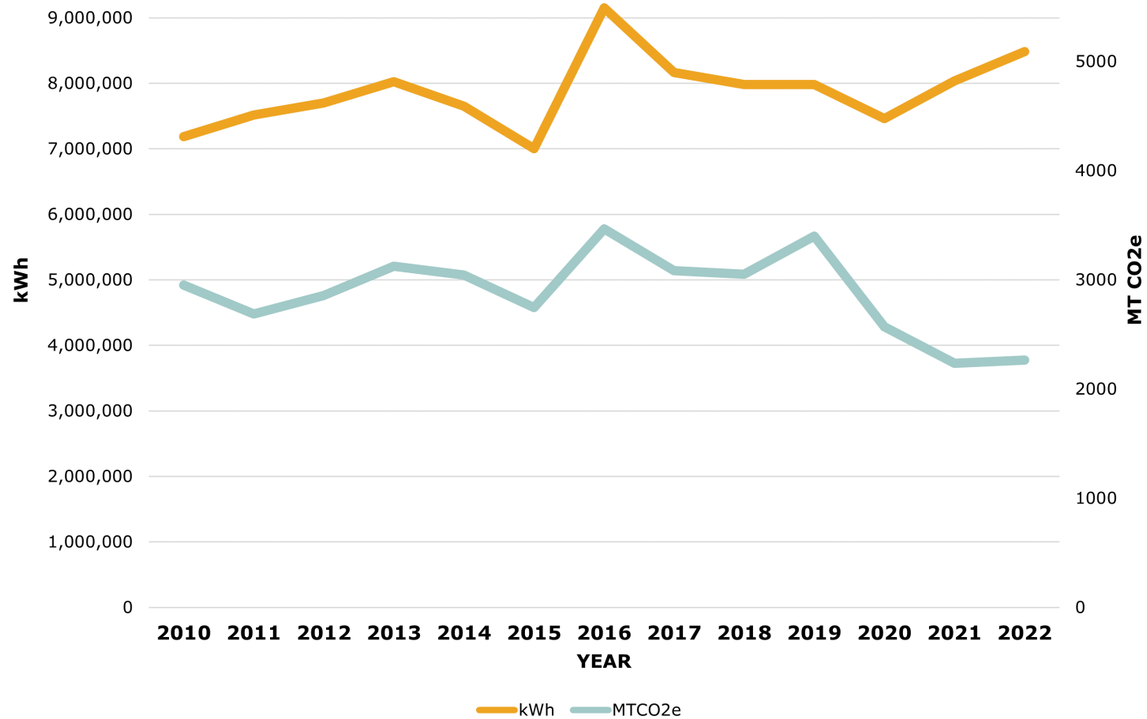
As the electric grids move towards decarbonization the relationship between energy use and operating emissions is decoupling.

This means even if zoo electricity use increases due to building and transportation electrification, overall operating emissions will continue to decrease due to the changes on the PGE grid. The zoo has already begun to witness this phenomenon with an increase in recent years in electrical usage due to new exhibits and a post-pandemic visitor return. Yet during this same period, it experience a decrease in operating emissions. This trend is anticipated to continue as PGE moves toward the state mandated HB2021 zero emissions by 2040 target.

BASELINE: YEARLY OPERATING EMISSIONS



ENERGY V EMISSIONS



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PROJECT ZONES

© Sahar Coston-Hardy

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PROJECT ZONE KEY MAP

1 GREAT NORTHWEST

Enhancement of the iconic Great Northwest exhibits and visitor experience with new pathways, elevated walkways, and some new animal species while preserving the native Douglas fr forest. Rotational fexible habitats will allow species like black bears, beavers, and river otters to explore di ferent terrains, diversifying their habitat space and providing a dynamic experience for visitors.

2 COASTAL SHORES

Transform the heart of the zoo with the removal of Steller Cove, the Penguinarium, tiger and red panda exhibits to make way for a re-imagined Central Hub and new exhibits for seals, sea otters, and penguins. A new guest services building will provide direct access to the lower plaza, featuring a cafe, restrooms, and underwater views of seals, while a new carousel and open space inspired by the Paci fc Northwest coastal landscape will enhance the guest experience.

3 AFRICA

Redevelopment of the existing Africa Zone with new savanna exhibits for gira fe and black rhinos, new holding buildings and year-round viewing. The Tropical Forest building will house a walk-through aviary and diverse plant collection. A Kopje walking trail will connect the African Forest and Lowland Savanna zones featuring new exhibits for lions, painted dogs, and primates.

4 SOUTH HUB

Situated midway through the guest experience, the South Hub will provide key amenities like restrooms, retail, a play area, frst aid services, and a sit-down restaurant. The open plaza will serve as a transition zone between the Asia Forest Trail and African Savanna, with a focus on comfortable seating, canopy trees for shades, and a sprawling event lawn for picnics and events. Anchor attractions surrounding the hub also include the Herpetarium and Ambassador Animals.

5 ENTRY

Redevelopment of the existing zoo entry to improve accessibility, fow, and overall arrival experience. The plaza will be transformed into an inviting and intuitive space inspired by the local forest and mountain views. The design includes shade canopies, seating, and framed views of mountain goats, while also integrating existing architectural elements and native Paci fc Northwest plantings.

6 EAST HUB

Recently completed as part of Elephant Lands and Polar Passage, the East Hub shall be enhanced with permanent architectural shelters for fexible use between daily guest picnics and after-hours private events. At the knoll north of the Elephant South Habitat, a new children's adventure playground is envisioned o fering climbing opportunities and themed elements related to nearby animal species providing an engaging and unique experience for families.

7 ANIMAL CARE HUB

At the northeast corner of the zoo, Gate J is a hub for animal care functions like the Veterinary Medical Center (VMC) and serves as an entry and exit point for staf from Washington Park. Enhancements include improved vehicle access and additional staf parking. The animal care building will be replaced by a new structure featuring research labs and o f ces for various staf.

8 FACILITIES HUB

At the southwest corner of the zoo, Gate A serves as a hub for essential operational support functions such as horticulture, and facilities and maintenance o f ces, custodial staf, and welding and wood shops. The plan includes replacement of the existing older structures with new facilities, renovation of the Animal Nutrition Center (ANC), and a new greenhouse.



THE GREAT NORTHWEST

The Great Northwest is an iconic exhibit at the Oregon Zoo. Surrounded by a native Douglas Fir forest, this trail replicates the local Northwest watershed from forest canopy down to underground passageways formed by lava tubes, from waterfalls down to the bottom of the stream, all while highlighting native species in their natural habitat.

The Campus Plan proposes to preserve this immersive experience with enhanced accessibility and flow for visitors. Redevelopment within this zone will include new pathways and elevated walkways as well as the potential introduction of exciting new animal species to accompany the existing collection. The new development will limit the removal of existing mature trees as this zone falls within the City of Portland's environmental conservation overlay.

PROGRAM

Total Project Site	**3.2 AC**	**139,375 SF**
Exhibit & LSS Building		4,150 SF
Condor Care Building (ex)		440 SF
Condor Habitat (ex)		4,870 SF
Beaver & Otter Care Building		1,260 SF
Beaver Habitat		2,750 SF
Beaver View Shelter		1,440 SF
Otter Habitat		2,165 SF
Otter View Shelter 1		40 SF
Otter View Shelter 2		240 SF
Cougar Care Building (ex)		575 SF
Cougar Habitat (ex)		3,390 SF
Restroom Building (ex)		1,630 SF
Owl Care Building		570 SF
Owl Habitat		1,610 SF
Animal Habitat		1,825 SF
Eagle Habitat		2,430 SF
Black Bear Care Building		2,055 SF
Animal Yard		1,360 SF
Black Bear Yard		1,280 SF
Animal Habitat		20,010 SF
Black Bear Habitat		13,110 SF
Black Bear View Shelter		245 SF
Mountain Goat Care Building (renovated)		1,590 SF
Mountain Goat Yard (ex)		500 SF



Proposed Species

Beaver

Cougar

River Otter

Black Bear

New exhibits will also provide an opportunity to restore the understory of the native Douglas Fir Forest, continue the zoo's ongoing e fort to remove non-native and invasive species, and improve the overall health of the native forest. Botanic collections may include ferns, maples, and native vegetation used by indigenous communities within the area.

As visitors round the corner of the rocky mountain goat exhibit, they will remain at the canopy-level as they trek across a new elevated bridge to the opposite side of the ravine. Then visitors will trace the edge of the ravine, eye-level with owls high up in the trees as they continue to the existing bald eagle overlook. Through the existing covered bridge, visitors will arrive at a new exhibit.

Occupying the west side of the ravine, the new exhibit will limit site disturbance by enveloping the existing natural site with its mature vegetation and complex topography. From there, visitors will make their way down to the forest foor on an at-grade path taking in close views of snowy owls, while possibly catching a glimpse of black bears up high up along the ridge.

At the base of the ravine and opposite to the existing cougar and condor exhibits, new habitats will be provided for river otters and beavers, completing one's journey down the mountain. Incorporated throughout the new pathways will be areas for visitors to pause and absorb the sights, smells and sounds of the forest as they wait in anticipation for the local animal residents to pass through.

An important feature in this zone is the implementation of rotational fexible habitats. By creating physical linkages between exhibits of di ferent species, these animals can rotate through all the exhibits at di ferent times, increasing their habitat space and promoting natural exploratory behaviors, as well as providing a dynamic experience for visitors. Seasonally, there may even be opportunities for one species to occupy both habitats while bears hibernate during the winter. All exhibits will be designed for the individual species with the most rigorous standards to allow for ultimate fexibility.

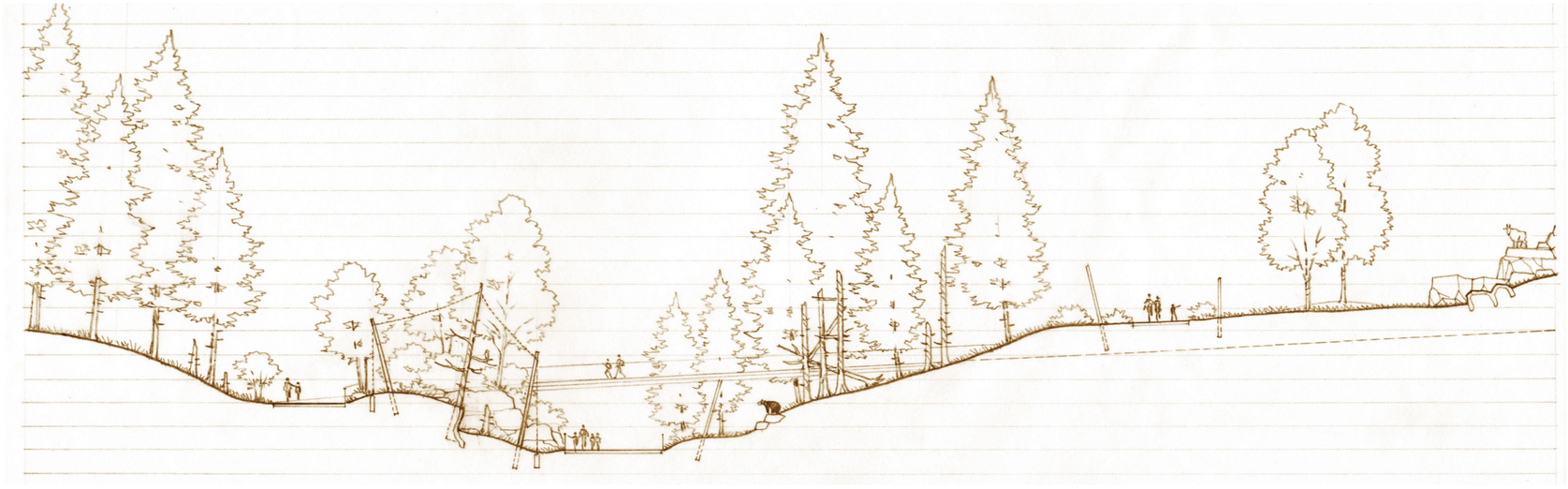


Northwest forest landscape

Tying into the zoo's campus-wide focus on water conservation, the Great Northwest will incorporate both renovated pools and new pools with life support systems (LSS). The existing 20,000-gallon pool within the Eagle exhibit is a freshwater aquarium for native PNW species and shall remain but replace the LSS equipment similar to the existing with sand fltration, temperature control, ultraviolet sterilization, and provisions for gas exchange.

The new aquatic exhibits in the Great Northwest requiring LSS are river otter, beaver, and tanks in the new Freshwater Exhibit Building. River otter and beaver have a combined volume of 40,000 to 50,000 gallons and share a life support system. Anticipating underwater viewing and the industrious behaviors of both river otters and beavers, the LSS process consists of strainers or a screen to remove coarse solids, sand fltration, ozonation, ultraviolet sterilization, and provisions for gas exchange.

Freestanding tanks will be supported by o f-the-shelf packages similar to a home or commercial aquarium tank. The backwash water from the sand fters associated with all of these exhibits is an excellent candidate for reuse on the zoo's campus. For example, a simple single pass recovery system could adequately treat this water for reuse as makeup water to exhibits like Elephant Lands and Condors of the Columbia.



Section through The Great Northwest Canyon

0' 15' 30' 60'



Great Northwest Canyon Trail

COASTAL SHORES

At the end of the existing boardwalk, visitors arrive at the center of the zoo, met with the rocky sea stacks of Steller Cove and panoramic views of the zoo beyond. Although home to some favorite animal species such as sea otters and seals, the circulation through the existing Steller Cove exhibit can be unclear, causing those unfamiliar with the zoo to miss the Education Center or Penguinarium. Further, most of the structures in this part of the zoo are reaching the end of their service life due to aging infrastructure and frequent need for maintenance and repairs. Therefore, with the demolition of Steller Cove, the Penguinarium, and the dated tiger and red panda grottos, Coastal Shores plans to redevelop the heart of the zoo with a new vision that will integrate the recently completed Polar Passage, Education Center, and Discovery Plaza with new outdoor seal, sea otter, and penguin exhibits.

Key to this redevelopment is the transformation of the Central Hub into a true plaza with guest amenities, way f nding, and circulation. From the boardwalk level, a new Guest Services Building will be constructed to provide visitors the choice to immediately get to the lower level of the central hub by way of elevators or stairs. At the lower level, the building will house restrooms and a quick service snack option as well as feature underwater viewing of the seals. Opposite the Guest Services Building will be a new and improved hand-crafted carousel housed within an enclosed shelter. Throughout the Central Hub, there will be plenty of open space for circulation as well as built-in planters and seating.

PROGRAM

Total Project Site	**2.0 AC**	**87,870 SF**
Guest Services Building (2 f oors @ 3,772)		7,545 SF
Carousel Enclosure		3,110 SF
Sea Cave		2,420 SF
Sea Otter & Seal O f -Exhibit Pools		1,540 SF
Sea Otter Habitat		3,060 SF
Seal Habitat		3,420 SF
Coastal Habitat		205 SF
Coast Habitat Support Building		800 SF
Penguin Care Building		985 SF
Penguin Habitat		3,690 SF
Penguin Underwater View Shelter		500 SF
LSS Building (2 f oors @ 4,294)		8,590 SF

Reference imagery





Proposed Species

Sea Otter

Harbor Seal

Humboldt Penguin

From the upper level of the Guest Services Building, visitors will also have the option to begin their venture into Coastal Shores, enjoying multiple views of sea otters from varying vantage points and then panoramic views of penguins at the Discovery Plaza as they swim around their new outdoor pool.

The concept for the walkways, exhibits, and vegetation within this area is inspired by the Pacifc northwest coastal landscape of forest and rugged, coastal edges supporting many of these coastal animal species. New planting areas may be broken into dif erent plant communities: Discovery Plaza may support lower-growing and resilient coastal headland-type of plants including reed grass and frosted paintbrush, and the spaces within and immediately adjacent to the exhibits may focus more on Oregon's coastal forests.

Botanic collections bordering the new Coastal Shores exhibits could incorporate hemlock and cedar as well as understory species such as rhododendrons, azaleas, wax myrtle, and ferns. Collections of native plants important to local indigenous communities could also be highlighted in this area.

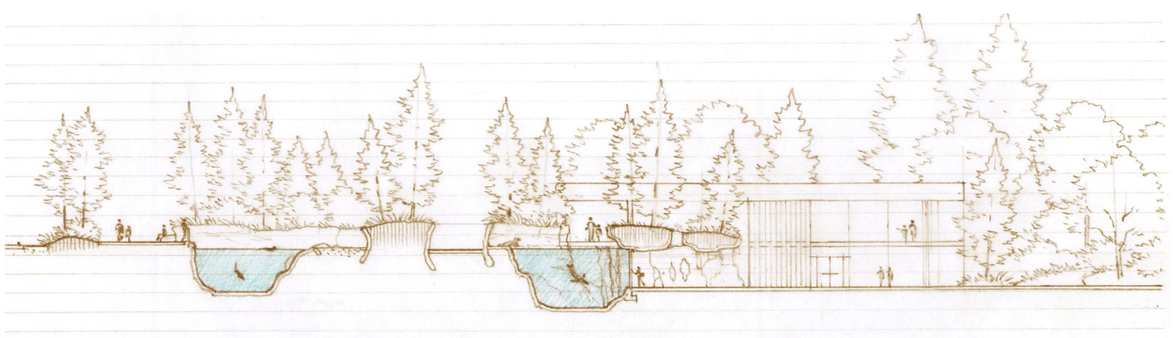
Behind the scenes, a new central service court provides direct access to all the new exhibits and a centralized location for day-to-day operations. While penguins will require a separate indoor holding building with nest boxes, sea otters and seals are able to be managed outdoors in of -exhibit pools with some open-air shelters as they are currently.

All the pools will be connected with water transfer chutes to allow for fexible rotation or create one large continuous swimming area. This fexibility allows for better integration of the zoo's role in sea otter conservation as a rotational housing facility for retired sea otter surrogate mothers after age 10 as well as young otters around age 3 who cannot be released into the wild, have been through the surrogate program, and will become future surrogate mothers.

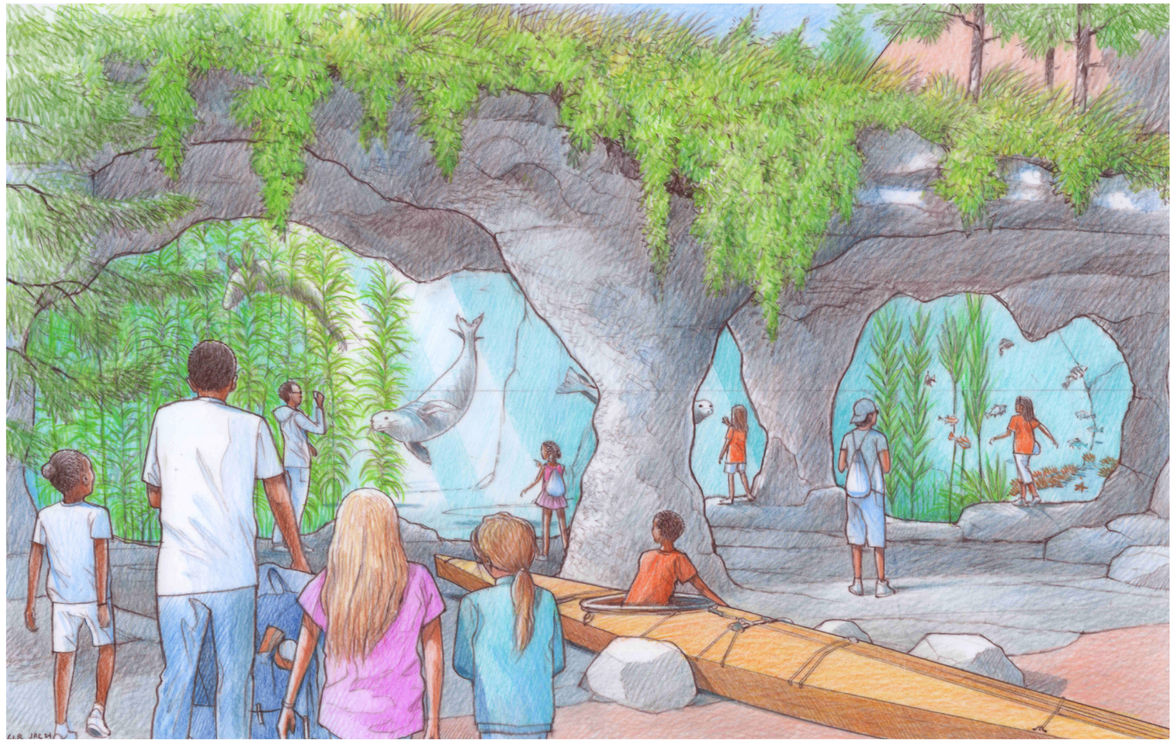
To optimize e f ciency and space for zoo staf, a new two-story LSS building will be constructed to house diet prep areas, enrichment storage, diver equipment and facilities, and o f ces for life support staf on the frst foor and all life support system (LSS) equipment for the three aquatic exhibits on the basement foor. The seal and sea otter pools will be saltwater, and penguin will be freshwater. The LSS processes for seal and sea otter incorporate sand fltrations, fractionators, temperature control, ozone, ultraviolet sterilization, provisions for gas exchange, and backwash recovery.

The penguin LSS process incorporates a combination of traditional LSS with sand fltration, ozonation, and temperature control targeting premium underwater viewing and a hybrid mechanical-natural system supplying the larger portion of the look-down-only pool. The penguin life support system also has an opportunity to use a backwash recovery system utilizing a hybrid mechanical-natural system approach. In this approach, wetland cells could be constructed. Water leaving the pool through skimmers and sumps from the exhibit will be sent to these cells to be treated, recreating the treatment processes that occur in natural wetlands, and then return to the LSS Building for re fnement and polishing before reentering the animal exhibits.

This process reduces the exhibits' potable water demand through biological water treatment and reuse of exhibit pool water. To supplement water use in these exhibits, Coastal Shores will also capture and reuse rainwater.



Section through habitat pools and Central Hub



Coastal Sea Cave underwater viewing



Outdoor Penguin habitat

SOUTH HUB

The South Hub is strategically located at the midpoint of one's journey through the zoo and exemplifes the campus driver of providing a holistic guest experience beyond animal-related experiences. Located where predator exhibits currently reside, visitors will arrive in the South Hub ready to eat, take a break, and recharge for the remainder of their visit. Therefore, guest amenities are a must and include restrooms, retail, frst aid, playground, and a sit-down restaurant.

Core to the South Hub is the open plaza space that unifes the surrounding amenities and destinations, while also providing a transition between the Asia Forest and Africa Savanna zones. With the thoughtful integration of pavement patterns, planters, and built-in seat walls, the plaza provides plenty of space for large crowds to fow easily through the South Hub as well as areas for groups to gather and sit.

The planting concept in this area seeks to emphasize seasonal interest as well as include large canopy trees for shade and comfort in the plaza. The species selected may reflect the indoor habitats of the Herpetarium or become a continuation of the Asian landscape with fowering trees and understory in the plaza planting beds.

Adjoining the plaza, a new event lawn will be incorporated in this area to support events and concerts within the zoo, as well as opportunities for picnicking and respite for visitors.

PROGRAM

Total Project Site	**5.0 AC**	**216,555 SF**
Pedestrian Bridge		3,560 SF
Restaurant & Patio		15,090 SF
Play Area		3,940 SF
Herpetarium & Ambassador Animal Building		21,020 SF
Ambassador Animal Yards		2,195 SF
Ambassador Animal Habitat		1,450 SF
Lawn		24,300 SF
Stage Enclosure		840 SF
Pavilion		2,000 SF
Restroom Building		1,155 SF
Red Panda Care Building		810 SF
Red Panda Yard		235 SF
Red Panda Habitat		3,620 SF
Primate Care Building		1,025 SF
Primate Habitat		3,360 SF



Anchoring the south edge of the plaza, the proposed restaurant will serve as the zoo's primary food and beverage option and will accommodate many more guests than the existing Aviary Café with a grand dining room, mezzanine level, and covered outdoor seating that offers views of the native Douglas fir forest around the zoo. The restaurant will offer multiple cuisine options in a scramble servery concept and an outdoor service window serving a la carte items outside of typical dining hours of the main restaurant.

On the lower floor, the restaurant will house a walk-in freezer and dry storage large enough to service all other food and beverage locations throughout the zoo. Its location with direct access from the main service road is ideal for deliveries and distribution.

Reference Imagery









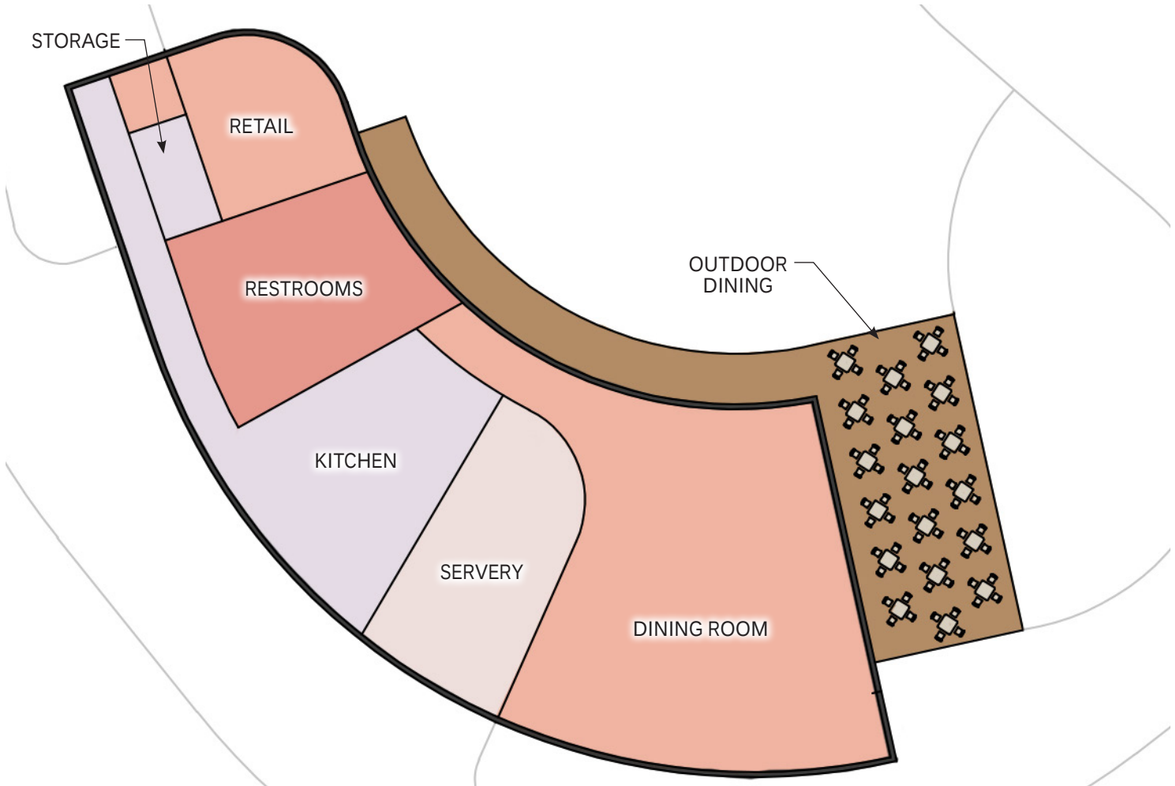
South Hub

RESTAURANT & PLAZA

The core of the South Hub focuses on a new open plaza space and primary sit-down dining option. This combination of functions provides critical space rest, decompress, and refuel before embarking on the journey through the second half of the zoo.

The restaurant facility features a sizable indoor dining option as well as covered outdoor seating adjacent to a new children's play space. This building also supports a signi f cant restroom facility, guest services zone, and small retail area.

The natural slope of the site in this area also provides an opportunity for the lower level of the restaurant facility to incorporate much needed support functions such as receiving and storage.



BUILDING PROGRAM DIAGRAM

0' 15' 30' 60' N

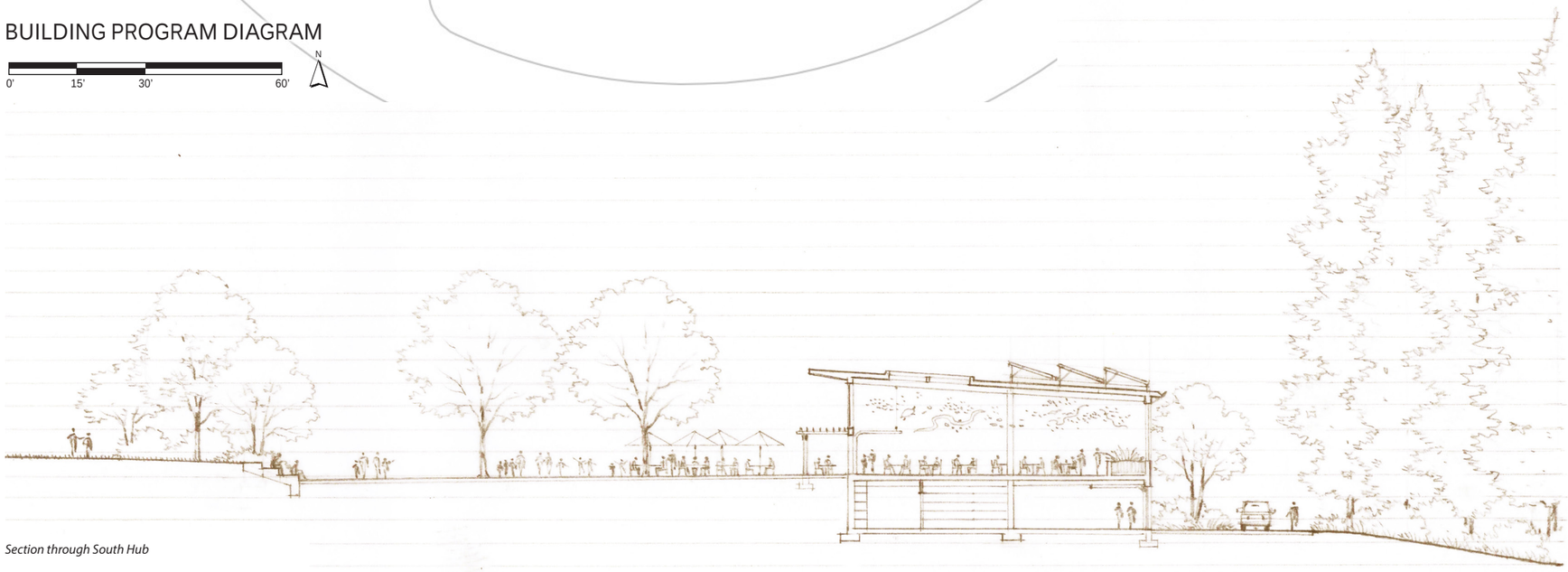
Reference Imagery





PROGRAM

Lower Level	
O f ces	1,500 SF
Food & Beverage Storage	3,500 SF
Support	2,000 SF
Plaza Level	
Dining Room	4,665 SF
Outdoor Dining	3,210 SF
Servery	1,600 SF
Kitchen	1,865 SF
Restrooms	1,715 SF
Retail	995 SF
First Aid	170 SF
Storage	275 SF
Net	**21,500 SF**
Net to Gross	**1,430 SF**
Gross	**22,930 SF**



Section through South Hub

ASIA FOREST TRAIL

Opposite Elephant Lands is a new immersive walking trail through the Asian Forest with added habitats for Asian primates and red panda. At the east edge of Primate Forest, new expanded holding areas for gibbons will be constructed to increase management flexibility and provide a direct connection between the existing facility to a new outdoor high-volume mesh enclosure.

This new area will be built to reflect the natural history of the primates who reside in this part of the world, offering guests a chance to see these animals as they would in the wild. In the new outdoor exhibit, it is key that all vertical space can be utilized by these arboreal species to replicate their natural brachiating and climbing skills.

Continuing along the trail, visitors will arrive at a new mixed species exhibit for red panda and muntjac deer. Red pandas will trail through the upper canopy branches while muntjac deer forage along the forest floor. A new shared holding building with an off-exhibit yard will be placed strategically out of view from visitors. Care should be taken to incorporate noise-reducing materials within the building envelope and barrier walls surrounding the habitat as red pandas can be sensitive to sound.

In the planting and materials, the Asia Forest Trail builds upon Elephant Lands by introducing other Asian plant species, emphasizing hardy ornamental species such as flowering trees, clumping bamboo, rhododendrons, hydrangeas, and other Asian bio-region species. The dense vegetated buffer shown south of the new animal exhibits will help to create that forest backdrop as well as visual and acoustic separation before visitors arrive in the clearing of the new lawn.

Key Plan



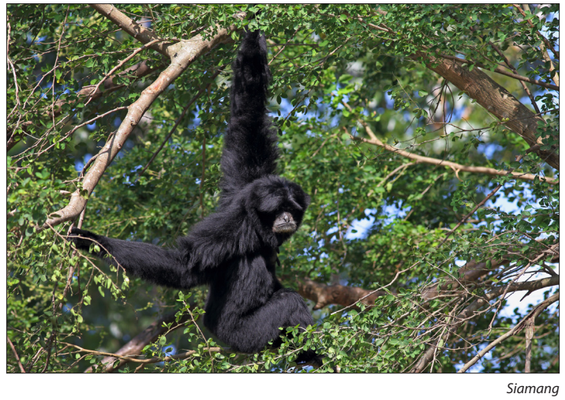
PROGRAM

Red Panda Care Building	805 SF
Red Panda Yard	235 SF
Red Panda Habitat	3,620 SF
Primate Care Building	1,025 SF
Primate Habitat	3,360 SF



Red Panda habitat

Proposed Species



Siamang



Muntjac



Red Panda

HERPETARIUM & AMBASSADOR

Wrapping the northwest edge of the event lawn, the façade of the Herpetarium and Ambassador Animal building receives visitors as they round the corner from the Asia Forest Trail. This hybrid facility takes advantage of complimentary programs which benefit operationally for staff and experientially for visitors by sharing the same complex. Ambassador Animals would occupy the north wing and the Herpetarium would occupy the east wing. Together, both programs highlight species diversity as well as extend the peak visitor seasons with a fully indoor experience.

The Ambassador Animal wing provides a combination of indoor and outdoor housing for animals with a visitor presentation space for approximately 150 people that is indoors but could have the ability to open large windows or walls on fair weather days. Animal species may include birds, mammals, and reptiles from around the world.

In the naturalistic presentation space, daily demonstrations would involve a variety of animals and varying themes. Guests will be immersed in the animal experience, seeing them crawl, climb and fly as they learn about wildlife from our ambassador team and connect with nature. This designated presentation space ensures programs can operate year-round, while promoting higher visibility of animals and increased staff-visitor engagement without routinely transporting animals.

While most ambassador animal housing is behind the scenes, some rainforest mammals such as sloths, prehensile-tailed porcupines, tamanduas, and binturongs are great candidates for being visible to the public and also tie in with the program of the Herpetarium. At the intersection of the buildings, these exhibits would layer into the beginning of the indoor walk-through experience. With a focus on reptiles and amphibians, the Herpetarium would be designed to support multiple climates, including montane, temperate, tropical, and desert environments related to each species' native habitats.

Through a mix of large open-air transects in a greenhouse type setting and smaller curated exhibits, this building would truly showcase diversity of species. Vegetation collections will introduce visitors to a variety of plants associated with each animal's region, support animal enrichment and enhance the zoo's botanic collection. The exhibits may also include aquatic features requiring life support systems (LSS) such as two to three pools in the 5,000-to-10,000-gallon volume range for crocodilian species. These pools could support fish in addition to the reptile species. The LSS would consist of sand filtration, temperature control, ultraviolet sterilization, and provisions for gas exchange.

The backwash water from the sand filters associated with the Herpetarium exhibits is an excellent candidate for reuse on site. For example, a simple single pass recovery system would adequately treat this water for reuse as makeup water to exhibits like Painted Dog, Flamingo, or Giraffe.

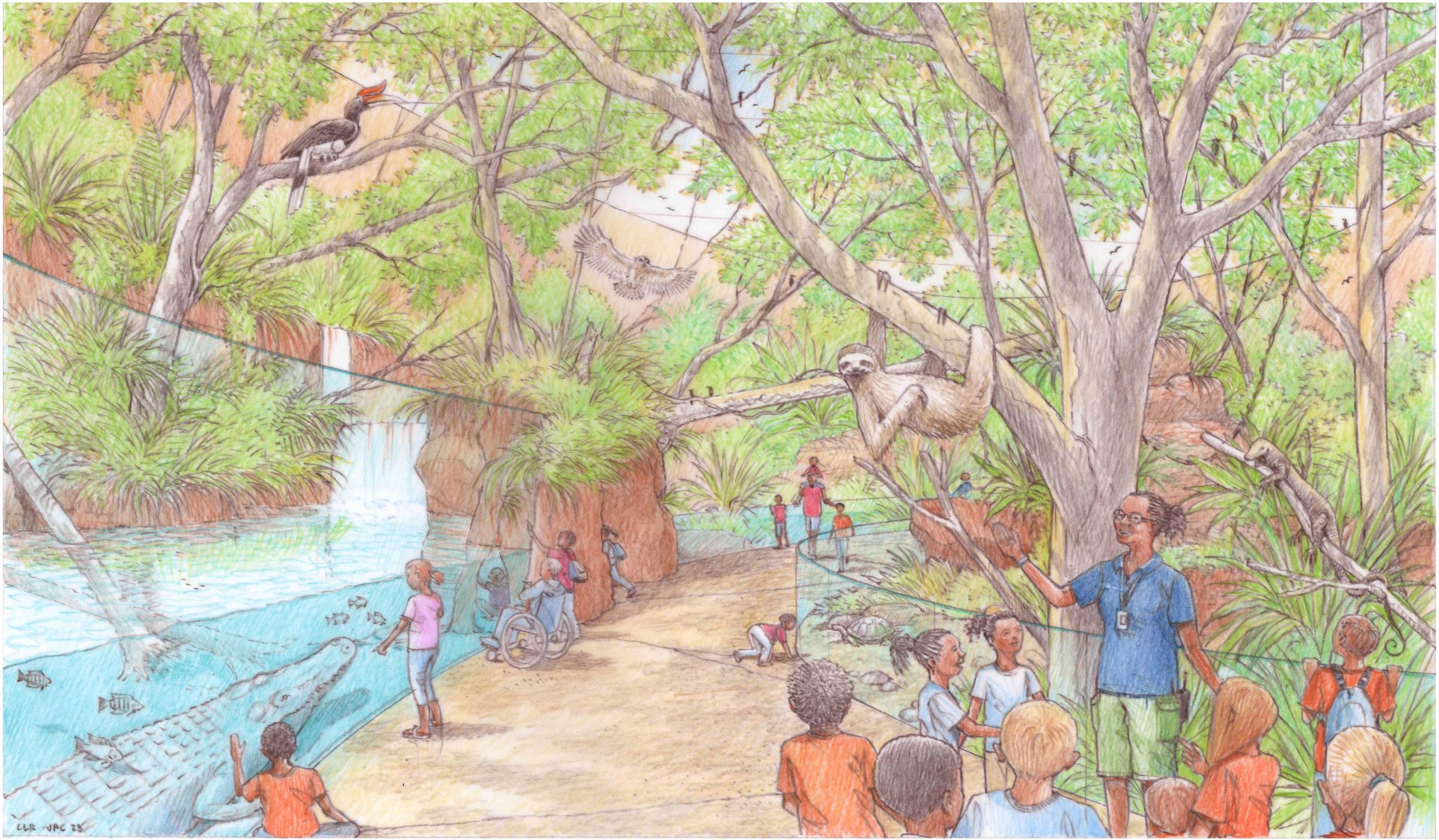
PROGRAM

Ambassador Animals	
Theater	2,030 SF
Rainforest Ambassador Exhibits (4 @ 280 SF)	1,120 SF
Visitor Gallery	950 SF
Animal Suites (20 @ 100 SF)	2,000 SF
Prep & Break Room	655 SF
Restroom	80 SF
Locker Room	85 SF
Shower Room	100 SF
M/E	465 SF
Herpetarium	
Rainforest Gallery	2,975 SF
Small Exhibit Gallery	780 SF
Desert Gallery	4,040 SF
Care Staff & Exhibit Support	2,220 SF
Net	**17,495 SF**
Net to Gross	**3,525 SF**
Gross	**21,020 SF**



Prehensile-tailed porcupine ambassador





Ambassador and Herpetarium interior

ENTRY

The entry plaza plays an important role for visitors as it is the first experience one has upon arriving at the Oregon Zoo. The existing plaza is currently sloped at approximately 5 percent and characterized by expansive asphalt surfacing, with little shelter from sun and rain. Circulation is challenged by the steeper slope, making it a space that is less accessible for gathering and events as well as unclear from a wayfinding perspective.

The plaza is framed on the north and south by the guest services and gift shop buildings, both of which have a distinctly Northwest Forest architectural quality. On the east side of the plaza is the existing Mountain Goat exhibit, which serves as a main attraction and immediate animal encounter for visitors.

The focus of the redesign is to create an intuitive flow in and out of the zoo as well as reduce stress for visitors. It will also direct guests towards the gift shop as they exit to encourage final opportunity for souvenirs, memberships, and donations. The redesigned plaza should generate excitement and anticipation for visitors as they arrive, and it must reinforce a positive experience as visitors depart. It should frame and accentuate the existing Mountain Goat exhibit and anchor the zoo in its context of the Pacific Northwest and Willamette Valley through plantings, materials, and design elements.

The new entry plaza concept addresses the programmatic needs of the main entry, solves accessibility challenges, and enhances visitor amenities and experiences.

The existing Guest Services and Gift Shop engage with the plaza and provide opportunities for visitors to orient themselves, sit, find grab-and-go snacks or restrooms, and shop. Design and material choices will respond to the existing architectural elements at the entry creating an integrated experience upon arriving at the Oregon Zoo. Planting throughout this area could include notable PNW native plantings such as Douglas fir, big-leaf maple, vine maples, rhododendrons, western sword fern, and other native forest groundcover.

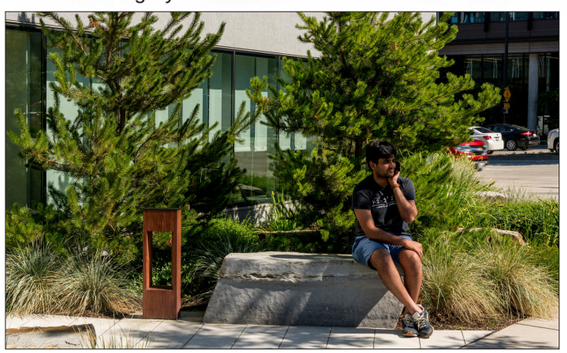
The entry concept also considers the Washington Park Campus Plan vision to create a pedestrian-focused plaza space at the MAX station and connect to the zoo entrance.





Concept rendering for plaza design

Reference Imagery







Entry Plaza

AFRICA

From the South Hub, visitors will traverse a new pedestrian bridge spanning above the zoo's service road, allowing public and service routes to operate independently. Visitors remain at a higher elevation while being transported from the native Oregon forest to the diverse landscapes of Africa. This redevelopment of the current Africa Zone takes advantage of the natural 40-foot change in elevation to replicate various topographies while also improving circulation and way f nding in a clear and trail-like sequence. Guests will traverse their way from the low, widespread savanna through outcroppings of kopje rocks and up to the dense canopy of the rainforest.

Architectural features that protect animals and visitors alike from inclement weather are incorporated throughout by way of covered outdoor viewing areas, indoor day rooms, and a fully indoor experience in the Tropical Forest Building. All these provide a more comfortable viewing experience as well as maximize views of animals throughout the year. For animals, new care facilities will be specially designed to the particular needs of each species and their respective group dynamics, such as bachelor herds of gira f es, prides of lions, and packs of painted dogs. Surrounding the Africa Zone, a perimeter service access road provides direct and e f cient access for zoo sta f to the buildings and exhibits.

PROGRAM

Total Project Site	**6.2 AC**	**270,230 SF**
Primate Care Building		1,160 SF
Primate Habitat 1		2,570 SF
Primate Habitat 2		2,610 SF
Primate Habitat 3		3,240 SF
Chimpanzee Habitat (renovated)		8,810 SF
Chimpanzee Yard		755 SF
Chimpanzee View Shelter		760 SF
Painted Dog Care Building		955 SF
Painted Dog Habitat		9,080 SF
Painted Dog & Lion Yard		1,705 SF
Lion Care Building		2,355 SF
Lion Yard		1,150 SF
Lion Habitat		15,055 SF
Lion View Shelter		1,915 SF
Tropical Forest Building		14,295 SF
Tropical Forest Outdoor Habitat		1,395 SF
Marsh Aviary Care Building		300 SF
Marsh Aviary		4,540 SF
Caf Ø		295 SF
Rhino-Gira f e Care & Exhibit Building		25,665 SF
Rhino Yard		1,350 SF
Rhino Habitat		19,350 SF
Rhino View Shelter		1,490 SF
Gira f e Habitat		18,185 SF
Ground Bird Shelters		310 SF



African savanna & kopje



Africa experience aerial view

SAVANNA

The first stop in one's journey through Africa is the Savanna. Upon arrival, there is an option for quick refreshments before trailing along the ridge above the plains. Among the sprawling landscape, the redeveloped African Savanna will focus on two popular species currently at the zoo: giraffe and black rhino.

All indoor animal areas will have natural substrate floors promoting health and creating a seamless transition to the outdoor exhibit beyond. At the dayroom as well as the outdoor covered area, visitors will be able to encounter these giants eye-to-eye by participating in staff-facilitated giraffe feedings and rhino encounters.

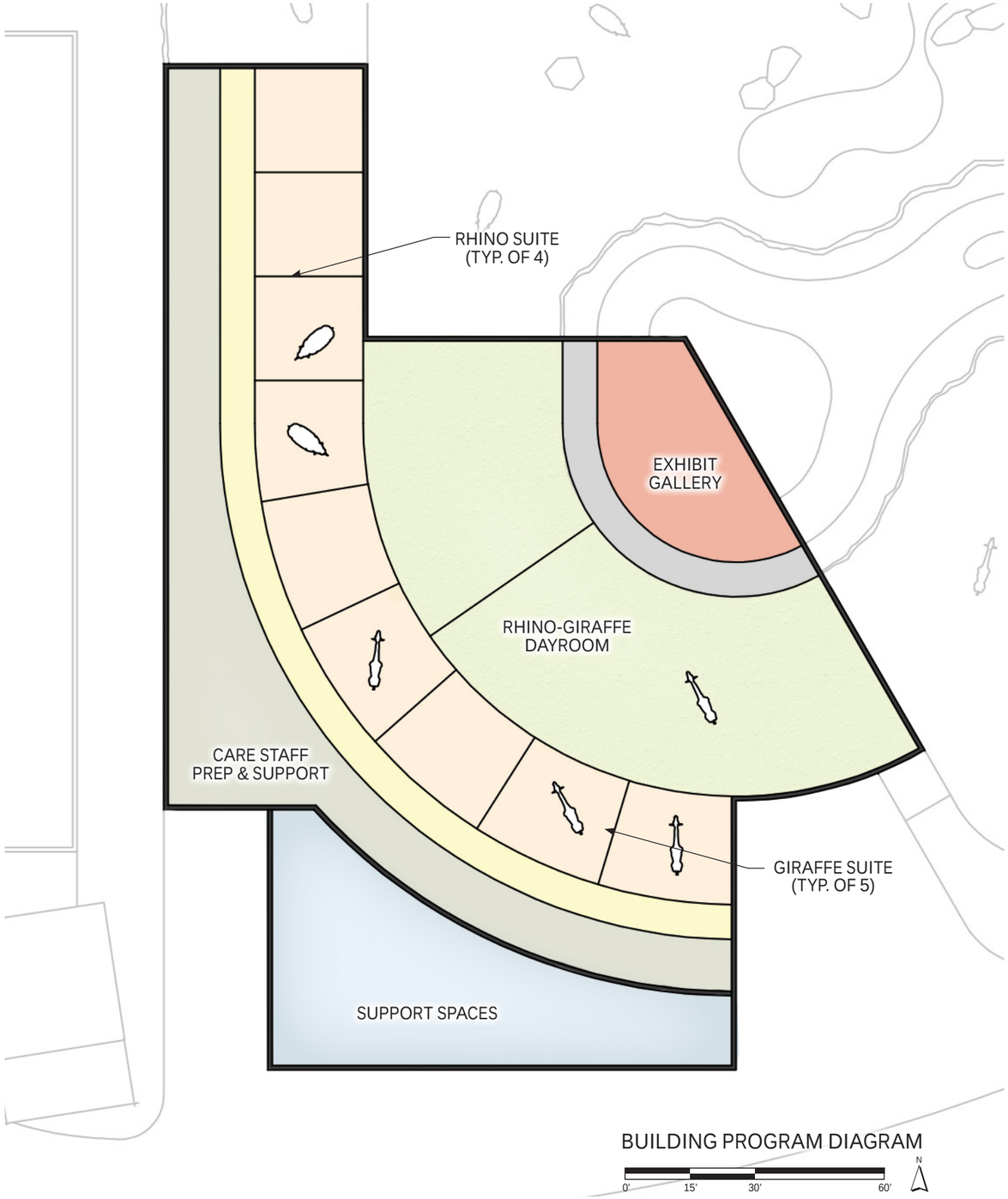
The animal habitats will be characterized by the grassy plains and widely spaced trees of the savanna. Rhinos will have a mud wallow to help cool off and protect their skin from insects and sun during the summer. Meanwhile, giraffes will share their habitat and watering hole with African ground birds, such as southern hornbills, vultures, and cranes.

The planting throughout will be inspired by native savanna species, incorporating collections of grasses and other drought tolerant plants, such as reed grass and rushes, which have similar characteristics of African-native cape rush and papyrus. Broad canopy shade trees with low understory plantings will create an immersive experience for visitors and provide respite throughout the Savanna area. It is recommended that the development consider incorporation of existing palm trees and eucalyptus trees as part of the new Savanna exhibits and visitor paths.

Service access is provided along the entire south edge of the site and the existing butterfly lab remains out of site from the visitor area.

PROGRAM

Exhibit Hall	1,695 SF
Rhino-Giraffe Dayroom	6,935 SF
Giraffe Suites (5 @ 740 SF)	3,700 SF
Rhino Suites (4 @ 600 SF)	2,400 SF
Care Staff Prep & Support	4,870 SF
Support Spaces	3,595 SF
Net	**23,190 SF**
Net to Gross	**2,470 SF**
Gross	**25,665 SF**

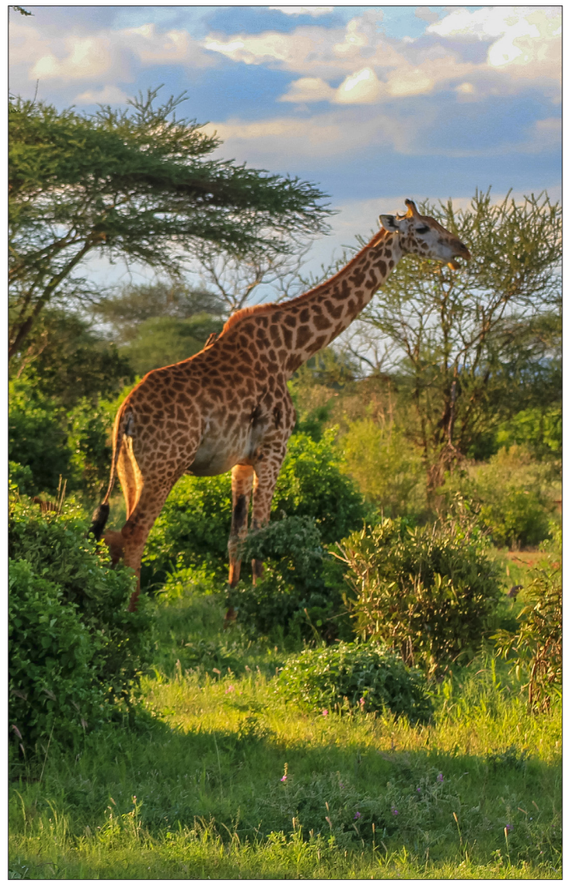


BUILDING PROGRAM DIAGRAM

Proposed Species



Black Rhino



Giraffe



Giraffe and rhino interior habitat

TROPICAL FOREST

In contrast to the fat grasslands and kopje landscape of Africa, the Tropical Forest building highlights the biodiversity of rainforests around the world with a focus on the huge variety of birds that live in our planets tropical forests. The building is embedded in the surrounding landscape and existing hillside below the Education Building while tying into the Kopje trail at two levels.

The experience begins outdoors at the bottom of the trail with the marsh aviary, home to famingos, spoonbills, and ibis. Then, entering the building at the ground level, visitors arrive inside the aviary. Visitors are instantly transported as they are surrounded with dense, lush plantings, and colorful birds fying through the high-volume space. A waterfall will add ambient sound accompanying the bird songs and natural daylight will food through vast glass curtain walls and skylights.

As a multi-story space, the Tropical Forest building allows visitors to experience the aviary from multiple vantage points. By taking the elevator, stairs, or entering through the northeast upper level, visitors will be able to trek around the perimeter of the aviary at the canopy level on bridges and higher-level paths.

In addition to many bird species, the indoor aviary provides an opportunity to showcase diverse non-native plant species that may not otherwise thrive in the zoo's Pacifc Northwest climate. The plant collection in the Tropical Forest pavilion may include orchids, ginger, rhododendrons, bromeliads, and even edible plants such as bananas and chocolate. Large mature trees installed at 20 to 25 ft in height will provide an immediate canopy effect within the space.

Back inside the upper level, the visitor experience transitions from day to night as the building will feature nocturnal exhibits for small mammals. Flying foxes will have the fexibility to also occupy the aviary as well as the outdoor exhibit north of the building.

Between this zone and the aviary, the Tropical Forest building provides a rich indoor experience and in doing so, provides guests with a consistent and comfortable experience during the shoulder seasons. Additionally, the open fow circulation through the upper level will provide the zoo with added event space opportunities after hours.

Supporting all these exhibits is dedicated keeper space as well as bird holding in the southwest zone of the building. Mechanical rooms will house equipment designed to maintain indoor tropical temperatures in addition to life support systems (LSS) for the major water features, including the outdoor marsh. This pool will utilize a hybrid mechanical-natural fltration process. The LSS consists of drum fltration, ultraviolet sterilization, and heating supplemented with constructed wetlands.

The wetland beds may be adjacent to the exhibit, or they may be integrated into the decorative stream course through the Life on the Kopje trail. Continuing the water conservation efforts, the building will capture roof runof for fushing toilets in the visitor single-user restrooms on the ground foor.

PROGRAM

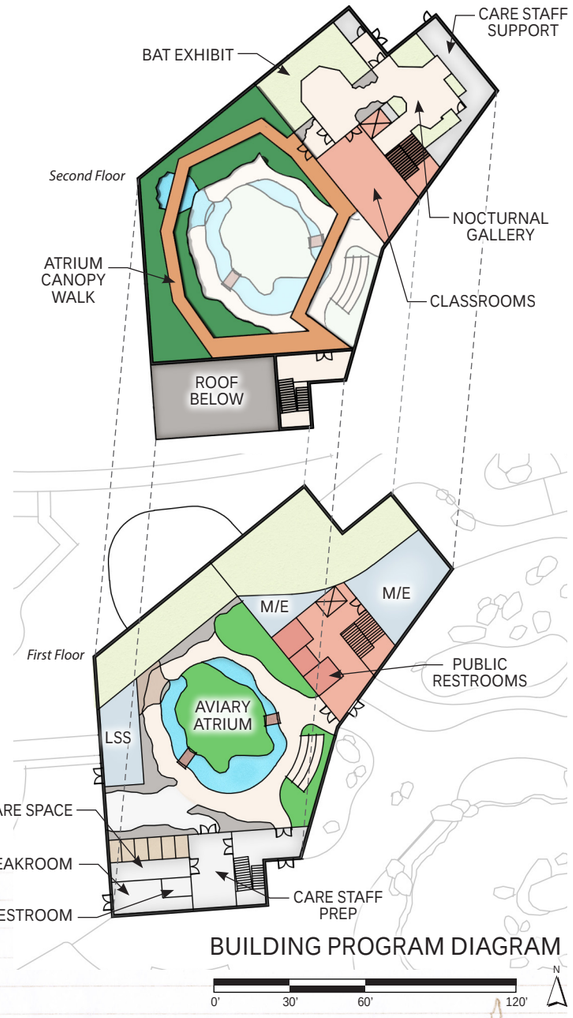
Lower Level	
Aviary Atrium	5,735 SF
Public Restrooms	360 SF
Animal Care Space	530 SF
Care Staf Prep	470 SF
Care Staf Break Room	260 SF
Care Staf Restroom	100 SF
LSS Room	570 SF
M/E	1,470 SF
Upper Level	
Atrium Canopy Walk	3,000 SF
Nocturnal Gallery	1,050 SF
Classroom	870 SF
Bat Exhibit	605 SF
Small Exhibits (4)	330 SF
Care Staf Support	680 SF
Net	**16,030 SF**
Net to Gross	**3,180 SF**
Gross	**19,205 SF**



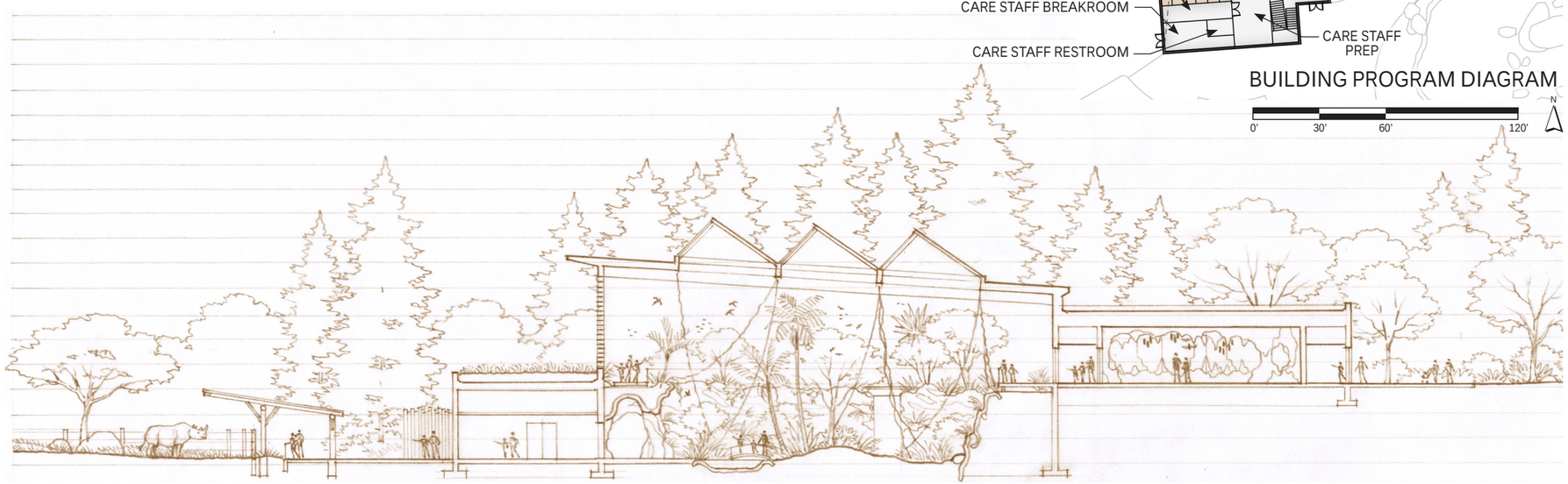
Banana Tree



Flamingo



BUILDING PROGRAM DIAGRAM



Section through Tropical Forest building

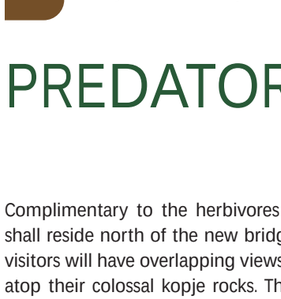


Tropical Forest canopy

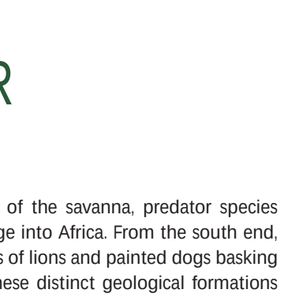
PREDATOR

Complimentary to the herbivores of the savanna, predator species shall reside north of the new bridge into Africa. From the south end, visitors will have overlapping views of lions and painted dogs basking atop their colossal kopje rocks. These distinct geological formations provide shade as well as high vantage points for predators to scan their surroundings. As visitors wander along the west edge of the exhibits, they will encounter these formidable species at eye-level while they patrol their domain. To further tap into their hunting and investigative instincts, keepers will be able to rotate lions and painted dogs between both exhibits, leaving behind scents and tracks for the other to follow. New holding buildings and shared of-exhibit yards will help to fully implement fexible rotation and maximize animal activity.

At the back of house, service access is provided from the east service road to both buildings and exhibits. In the buildings, roof runof shall be captured for reuse to washdown inside the animal holding areas. For cooling of in the summer, the painted dog exhibit features a running stream and the lions a small pool at the base of the rocks. The stream will utilize a simple hybrid mechanical-natural life support system (LSS). The lion pool has the option to be dump-and-fll or have a simple hybrid mechanical-natural LSS. Equipment for these life support systems shall be located and accessed within the back of house area.



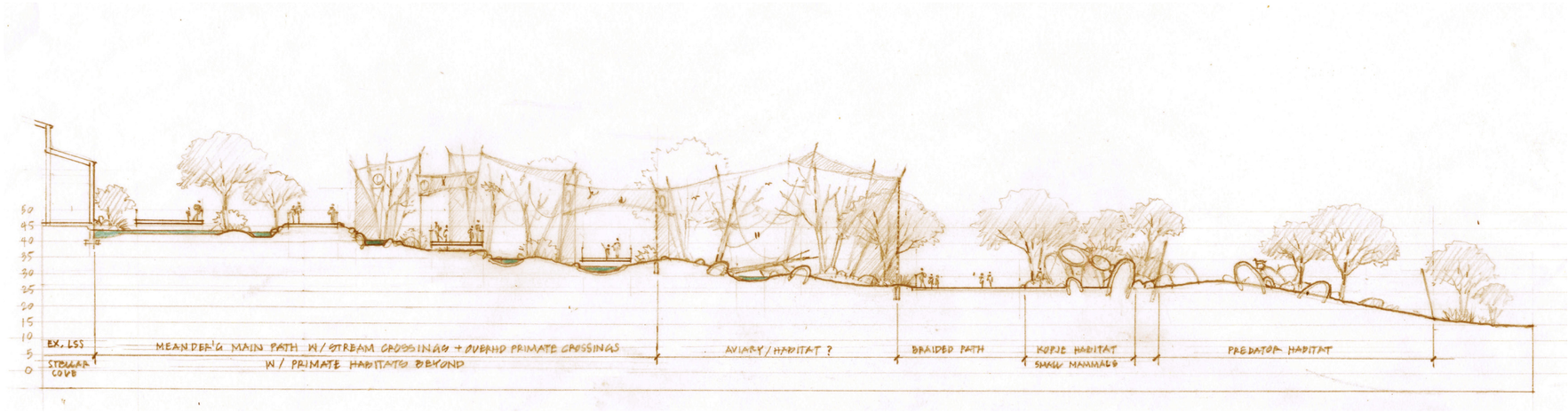
Lion



Painted Dog

Key Plan







Lion kopje

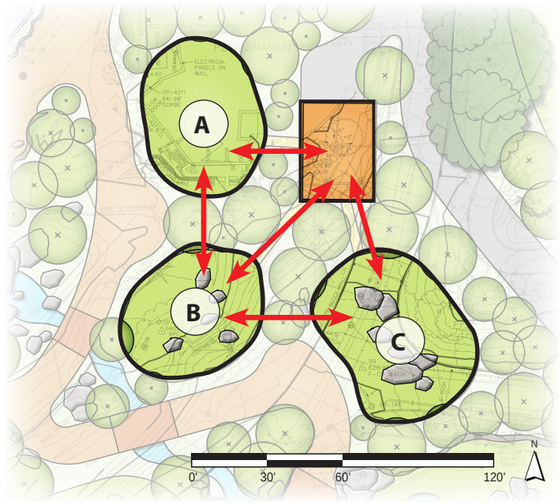
PRIMATE

At the top of the Kopje trail is a habitat sequence bridging the upland African Forest and Lowland Savanna zones. Dynamic layering of must-see Kopje outcroppings and a cascading stream course running from the top of the trail all the way down to the painted dog habitat visually draw visitors up the trail from the main path. Tertiary winding trails, narrow boardwalks and bridges integrate adventure play and exploration for children and families all while making the fifteen-foot climb up from Predator to Coastal Shores.

Nestled in the trail are three habitats for small African primates such as colobus and lemurs. The habitats will have linkages to each other to allow for fexible habitat rotation as well as provide the opportunity to be all open at once for one continuous trail habitat. The interconnected layout will greatly increase management fexibility and add choice to the various social groups of where and with whom they spend their day. Utilizing tree canopy to replicate the forest habitats these primates are from will create a more connected experience for visitors by adding ornamental deciduous trees and understory as well as demonstration gardens highlighting seasonal species such as banana trees.

The new habitats also incorporate a variety of climbing options and comfortable spaces at numerous levels, accommodating the preferences of all species that inhabit the area. Screened by vegetation is a central primate holding building providing direct linkages to each habitat.

Though not visible from the trail, this development would also include the west branch of the middle service road providing direct access for zoo staf to the new primate holding building, the Central Hub, and modifed chimpanzee habitat. Modifcations in the existing chimpanzee area may also provide an opportunity to include improvements such as more heat and shelter in the outdoor habitats as well as adjustments to better facilitate the housing of multiple groups of chimps.



Habitat Rotation Diagram



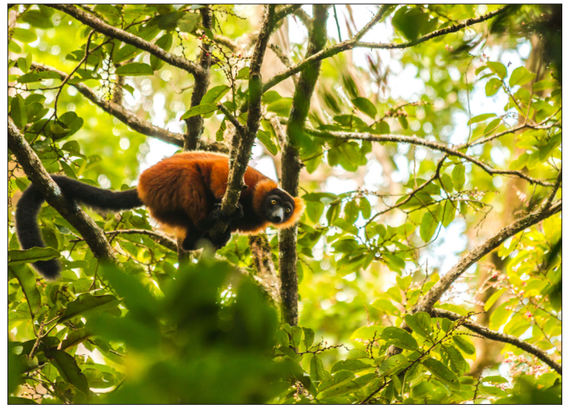
Red-tailed guenon



Colobus



Ring-tailed lemur



Red-ruffed lemur



Habitat design references spatial complexity of forest

EAST HUB

Fully surrounded by animal exhibits, the East Hub is a center of visitor amenities with restrooms, snack carts, lunch offerings from Growlers CafØ, and places to sit and gather. Notably, the restroom building is the first building in Oregon to use cross-laminated timber (CLT), a relatively new and sustainable construction material.

From here, visitors have expansive views of elephants browsing in the North Meadow or taking a plunge in the 160,000-gallon pool, all set to the backdrop of the native Douglas fir forest. Ample plaza space is provided for visitors to stop and rest, picnic at the lunch tables, or even observe a keeper talk around the elephant pool. To the west, Polar Plaza offers underwater views of polar bears and to the south, one may see primates from a distance up at the canopy level.

The flexibility of this area to be utilized by daily visitors and after-hours private events is key to the zoo's financial sustainability goal as well as providing a well-rounded visitor experience. The Campus Plan aims to complement and further support these functions with some small but impactful improvements: shade shelters and destination play.



Growler's Cafe

PROGRAM

Adventure Play Zone	5,950 SF
Polar Plaza Shelter	7,630 SF
East Hub Shelter	1,690 SF
Growlers CafØ (ex)	1,560 SF
Restroom Building (ex)	1,660 SF
Storage Building (ex)	1,730 SF



View of Elephant Lands from event shelter

Site for destination play

SHADE SHELTERS

Recently completed in 2021, the Polar Plaza serves primarily as an outdoor gathering area for daily guests picnicking at the zoo and secondarily as a venue for private events. Currently, shade cover and protection from the elements is provided by table umbrellas and temporary tents. The Campus Plan proposes to enhance the existing plaza with a permanent architectural shelter to extend its use throughout the year. In the Pacifc Northwest style with heavy timbers, the shelter will unify the existing structures surrounding the plaza into one cohesive space. The shelter will also include movable walls so that when open it maintains framed views of polar bears and elephants, and when closed can ensure privacy for events and even further protection from inclement weather allowing for ultimate fexible use.

Similarly, a permanent shade shelter is proposed to be constructed in the East Hub to replace existing temporary tents and provide shaded and sheltered dining space near Growler's CafØ.

PLAY AREA

Elephant Lands is one of the most popular areas of the zoo and at the east end of the campus is a major destination for all visitors. Just west of Forest Hall is an existing knoll that is characterized by the Douglas fr forest seen throughout Washington Park. Over the years, this space has been used for play and picnicking opportunities, but more recently has not been open to visitors. This area is within the City of Portland's environmental conservation overlay, so development is limited and the design must be environmentally sensitive. The knoll is located at the midpoint of most zoo visits and near food services, and lends itself to creating a unique play experience where families can relax, and children can explore.

A custom children's adventure playground will provide opportunities for climbing and imagination, themed to the forest environment and include sculptural elements that refect nearby animal species such as Asian elephants. With the playground tucked away seventeen feet above the main visitor path, the approach of switch-backing ramps and stairs traversing the edge of the knoll is part of the journey itself. Upon arrival, visitors will be able to take in panoramic views of Washington Park for an iconic photo opportunity before retreating into the forest. All elements of the play area will be inclusive and accessible, constructed of wood and powder-coated steel with custom animal and plant fgurines. While preserving most of the existing native trees and planting, this area will also incorporate Asian and Oregon-native shared planting such as rhododendrons and fern species along the new pathways.

Reference Imagery









Destination Play

FACILITIES HUB



Located in the southwest corner of the zoo, Gate A does the heavy lifting of housing key operational support functions including facilities and maintenance o f ces, horticulture and custodial sta f, welding and wood shops, animal nutrition, hay storage, sta f parking, and composting. Its current location at the southwest entrance into Washington Park o f Exit 72 from Highway 26 is ideal for receiving deliveries and then distributing support services throughout the rest of the campus along the main service road that follows the zoo perimeter.

The facilities and maintenance o f ces are currently housed in some of the oldest structures on campus and will be replaced with a two-story metal building facility in the same location. The existing Animal Nutrition Center (ANC) is a robust concrete building and will be renovated to be fully dedicated to animal nutrition with a walk-in freezer and browse cooler. Any restaurant food and beverage storage will be relocated as a part of the proposed new restaurant project at the South Hub. For the horticulture department, a new greenhouse will be incorporated in this area for growing browse as well as tropical plants.

PROGRAM

Facilities-Maintenance Shops & O f ces	11,680 SF
Animal Nutrition Center (renovated)	7,445 SF
Greenhouse	1,870 SF

ANIMAL CARE HUB



The Animal Care Hub is located at the northeast corner of the zoo, housing key animal care functions such as the Veterinary Medical Center (VMC) and providing direct service access to enter and exit the zoo from Washington Park. It is critical to maintain the entry and exit f ow to and from the VMC, especially for emergency situations. The approach through Gate J will be improved with a widened turning radius, and additional sta f parking will be added on both the upper and lower roads.

The existing Care, Connection and Conservation (C3) Building will be replaced with a new three-story mass timber structure within the same footprint, including research lab workspaces, and meeting areas for curators, managers, and animal care support sta f. The existing Wildlife Live and Avian Reproduction Center facilities will remain and may incorporate some modest renovations in the future.

PROGRAM

Care, Connection, & Conservation Building (3 f oors @ 4,550)	13,650 SF
Wildlife Live (ex)	2,155 SF
Avian Rescue Center (ex)	1,075 SF

6.1 2024 Urban Growth Management: Public Hearing on Chief Operating Officer Recommendations

Public Hearing

Metro Council Meeting

Thursday, September 26, 2024

2024 URBAN GROWTH MANAGEMENT:
PUBLIC HEARING ON CHIEF OPERATING OFFICER/STAFF RECOMMENDATIONS

Date: September 9, 2024
Department: Planning, Development, and Research
Meeting Date: September 26, 2024

Prepared by: Laura Combs, Associate Regional Planner
laura.combs@oregonmetro.gov
Presenter(s): Marissa Madrigal, COO; Ted Reid; Eryn Kehe (Metro Planning, Development, and Research)
Length: 60 minutes

ISSUE STATEMENT

The region's urban growth boundary (UGB) delineates urban and rural uses and is a tool for ensuring thoughtful and efficient growth patterns. The Metro Council is required by state law to – at least every six years – determine whether the UGB has adequate land for expected housing and job growth. The Metro Council last made this determination in December 2018 and is scheduled to do so again by the end of 2024. The Metro Council has directed staff to proceed with an approved work program and requested periodic updates.

Over the course of the year, staff has presented preliminary results for the demographic and economic regional forecast and the capacity analysis. These elements of the Urban Growth Report estimate how many people may live or work in the region over the next 20 years and if the land inside the existing UGB is sufficient to accommodate their homes and places of employment. The draft 2024 Urban Growth Report (UGR), released for discussion at the Metro Council's July 9, 2024 work session, is the analysis that supports the Metro Council as it determines if there is a demonstrated regional need for a UGB expansion.

For the 2024 urban growth management decision cycle, Metro received one proposal from the City of Sherwood to expand the UGB to include the 1,300-acre Sherwood West urban reserve area. If Metro Council determines more land is needed in the UGB to support the next 20 years of growth, they will also determine how Sherwood's proposed expansion will accommodate the needs described in the Urban Growth Report.

A public comment survey was available from July 9 – August 22 to collect feedback on the draft UGR and the Sherwood West expansion proposal. The public comment summary report and the final UGB Youth Cohort report were available for Council review before this public hearing.

A key part of the Council's decision-making process is consideration and discussion of the Chief Operating Officer/Staff recommendations. These recommendations include a point of view about where to fall in the housing and employment capacity gap ranges provided within the Urban Growth Report and a recommendation about the proposed expansion area.

At the September 12 work session, the Metro Chief Operating Officer (COO) and staff summarized the key elements of the recommendations and answered questions about the next steps for the Council's growth management decision. MTAC, MPAC, and CORE have provided their recommendations in response to the COO/Staff Recommendations, and those statements will be presented for consideration during this public hearing.

ACTION REQUESTED
Metro Council considers the 2024 COO/Staff recommendations, public testimony, the public comments received during the public comment period, and the recommendations from MPAC and CORE.

Staff requests that the Metro Council provide it with direction on its intended growth management decision and conditions of approval at its October 8, 2024 work session.

IDENTIFIED POLICY OUTCOMES
State law and regional policies lay out an intention to make efficient use of land inside the UGB and to only expand the UGB if there is a demonstrable regional need to accommodate expected housing or job growth. The Metro Council makes this growth management decision for the region after significant engagement. To ensure that areas added to the UGB are ready for growth, it is the Metro Council's policy to only expand the UGB in urban reserves that have been concept planned by a city or a county. Metro provides grant funding for local jurisdictions to complete concept planning. Metro Council will decide if there is a regional need for land to support demand for housing and jobs and if the UGB will be expanded to include the proposed Sherwood West urban reserve area. If so, the Council will determine conditions of approval to be placed on the expansion area.

POLICY QUESTION(S)
- What is the Council's determination regarding the COO/Staff Recommendations?
- Does the Council have any direction for staff regarding next steps for its decision process, including guidance on potential conditions of approval?

POLICY OPTIONS FOR COUNCIL TO CONSIDER
The Council may respond to the 2024 COO/Staff Recommendations with direction on:
- The identified regional need, shown through housing and employment land capacity gap ranges
- The topic areas for potential conditions of approval, and more specific details on possible conditions

STAFF RECOMMENDATIONS
- Staff recommends Metro Council consider the COO/Staff Recommendations and provide guidance on the next steps of the decision-making process at its October 8, 2024 meeting.

STRATEGIC CONTEXT & FRAMING COUNCIL DISCUSSION

Regional urban growth management decisions have long been one of the Metro Council's core responsibilities. The Metro UGB – first adopted in 1979 – is one of Metro's tools for achieving the 2040 Growth Concept's vision for compact growth, thereby protecting farms and forests outside the UGB and focusing public and private investment in existing communities. These are all key to reducing greenhouse gas emissions and expanding housing options.

The UGB is just one policy tool, however, and must be accompanied by other policies, partnerships, and investments to make good on the 2040 Growth Concept and to address challenges like housing affordability, displacement, houselessness, and economic development. Often, growth management processes provide a venue for identifying the need for new initiatives.

Metro strives for transparency in its growth management work, which can be challenging given its highly technical aspects. The 2024 decision will provide opportunities for interested parties to inform and understand the many technical and policy aspects of this work. Those opportunities include, not only standing advisory committees, but also groups formed for this decision process such as the UGR Roundtable, the Land Use Technical Advisory Group, the regional forecast expert review panel, and the Youth Cohort.

BACKGROUND

At its March 7, 2023 work session, the Council directed staff to begin implementing the work program for the 2024 urban growth management decision. Staff have returned periodically to update the Council on the progress of key components of the work program.

ATTACHMENTS

- Is legislation required for Council action? x Yes □ No
- If yes, is draft legislation attached? □ Yes x No
- What other materials are you presenting today?
    - 2024 Urban Growth Management: Metro Chief Operating Officer/Staff Recommendations
    - 2024 Urban Growth Management Decision: Public comment report
    - 2024 Urban Growth Management: Youth Cohort final report

2024 Urban Growth Management Decision: Metro Chief Operating Officer/Staff Recommendations

August 26, 2024

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LIST OF ACRONYMS

The following is a list of acronyms used throughout this document.

COO: Metro Chief Operating Officer
CORE: Committee on Racial Equity
MPAC: Metro Policy Advisory Committee
MTAC: Metro Technical Advisory Committee
UGB: urban growth boundary
UGR: Urban Growth Report

A DELIBERATE APPROACH TO GROWTH

Under Oregon state land use law, the Metro Regional Government ("Metro") is charged with making decisions about whether to expand the urban growth boundary (UGB) in the greater Portland region. This communication from Metro's Chief Operating Officer contains the staff recommendation to the Metro Council regarding the need for a UGB expansion and the City of Sherwood's 2024 proposal to address that need.

The urban growth boundary has long been one of Metro's most important tools for focusing the development of new homes and businesses in existing downtowns, main streets, and employment areas. Residents of the region have told us time and again to hold this priority: make the most of the land inside the boundary so that outward growth on the urban edge only happens when it is necessary and provides benefit for the entire region. This deliberate approach is crucial for strengthening existing communities, protecting farms and forests, and reducing greenhouse gas emissions.

According to state law, Metro is required to make a decision about whether to expand the UGB at least every six years. In making these decisions, Metro must provide up-to-date information about demographics, population and employment growth, development trends, and estimates of buildable land inside the UGB. This thorough assessment of whether there is a regional need for expanding the UGB is not only required by law – it is central to the greater Portland region's identity. When new growth occurs at the edges of the urban growth boundary, it should be necessary, planned, and deliberate.

Today, the greater Portland region is facing a housing shortage crisis. In addition, there is agreement across the region that attracting more family-wage industrial jobs will help our communities thrive. However, it is also clear that simply providing more land won't necessarily result in jobs and housing. Experience has shown that certain conditions must be in place to ensure that UGB expansion areas produce housing and jobs in a near term time frame. Time and time again we have seen that development occurs successfully where there is a commitment from city leaders and community members, where there is a plan for paying for needed infrastructure, and where there is market demand. If these ingredients aren't present, new urban growth is extremely slow if it happens at all.

For those reasons, in 2010 the Metro Council adopted a policy to only expand the UGB into urban reserve areas that have been concept planned by a local government and that demonstrate readiness to be developed. In the current 2024 UGB cycle, the City of Sherwood is the only city that has prepared a concept plan and proposed a UGB expansion, and they have shown that these elements are in place. Sherwood's readiness for new urban growth provides an opportunity to address the regional land needs identified in the draft 2024 Urban Growth Report (UGR).

Consequently, Metro staff recommend that the Metro Council consider expanding the UGB to include the Sherwood West urban reserve. Staff further recommend that the Council consider placing conditions on this expansion to ensure that the land is used efficiently and will support regionally identified needs. These conditions could reinforce the City of Sherwood's concept plan for the expansion area by improving housing affordability and protecting industrial lands so that they produce well-paying jobs in the manufacturing sector.

The information that follows sets out the reasoning behind this recommendation and lays the groundwork for the Metro Council to consider potential conditions of approval.

ADAPTING AND IMPROVING OUR GROWTH MANAGEMENT PROCESS

Our region's deliberate approach to growth has paid dividends for people who call this region home by helping to maintain a unique connection to nature and a high quality of life. However, as the world changes, our approach to managing growth must change too. In response to evolving needs and conditions over the years, Metro and its partners have collaborated to make improvements to the urban growth management process such as:

- Working with our regional partners to identify designated urban reserves and rural reserves that provide certainty about where the UGB may or may not be expanded over the coming decades.
- Using a 'range' forecast to acknowledge that there is inherent uncertainty in estimating future growth over the next 20 years.
- Encouraging more timely housing and business development in UGB expansion areas by requiring that a local jurisdiction complete a concept plan for an urban reserve before the area is brought into the boundary.
- Providing grant funding to cities to support local concept planning and comprehensive planning efforts.
- Adopting a fast-track expansion process for adding large industrial sites to the UGB to respond to near term opportunities.
- Providing an off-cycle UGB amendment process to address unanticipated non-residential land needs such as those identified by school districts.
- Creating a mid-cycle UGB process to be responsive to city proposals for addressing unanticipated residential land needs between the designated 6-year scheduled approval process.
- Clearly specifying in Metro's Code the factors that cities must address in UGB expansion proposals.
- Completing a land exchange in 2023 that brought concept planned land within an urban reserve inside the UGB and removed unplanned land to ensure more of the land inside the UGB will produce housing.

- Continually improving technical analyses to reflect new practices, including how to forecast redevelopment potential and estimate current and future housing needs.
- Examining regional needs for industrial lands with specific site characteristics and applying that information to evaluate expansion proposals.
- As with the forecast, using a range of estimates to acknowledge the inherent uncertainty in predicting growth capacity within the UGB.
- Increasing transparency by convening the 2024 Urban Growth Report Roundtable, comprised of diverse expertise and interests.
- Elevating youth perspectives and building future leaders by convening a UGB Youth Cohort in 2024.

One of the characteristics that makes our region unique is our ability to collaborate and work together to adapt and modernize our systems to respond to changing conditions.

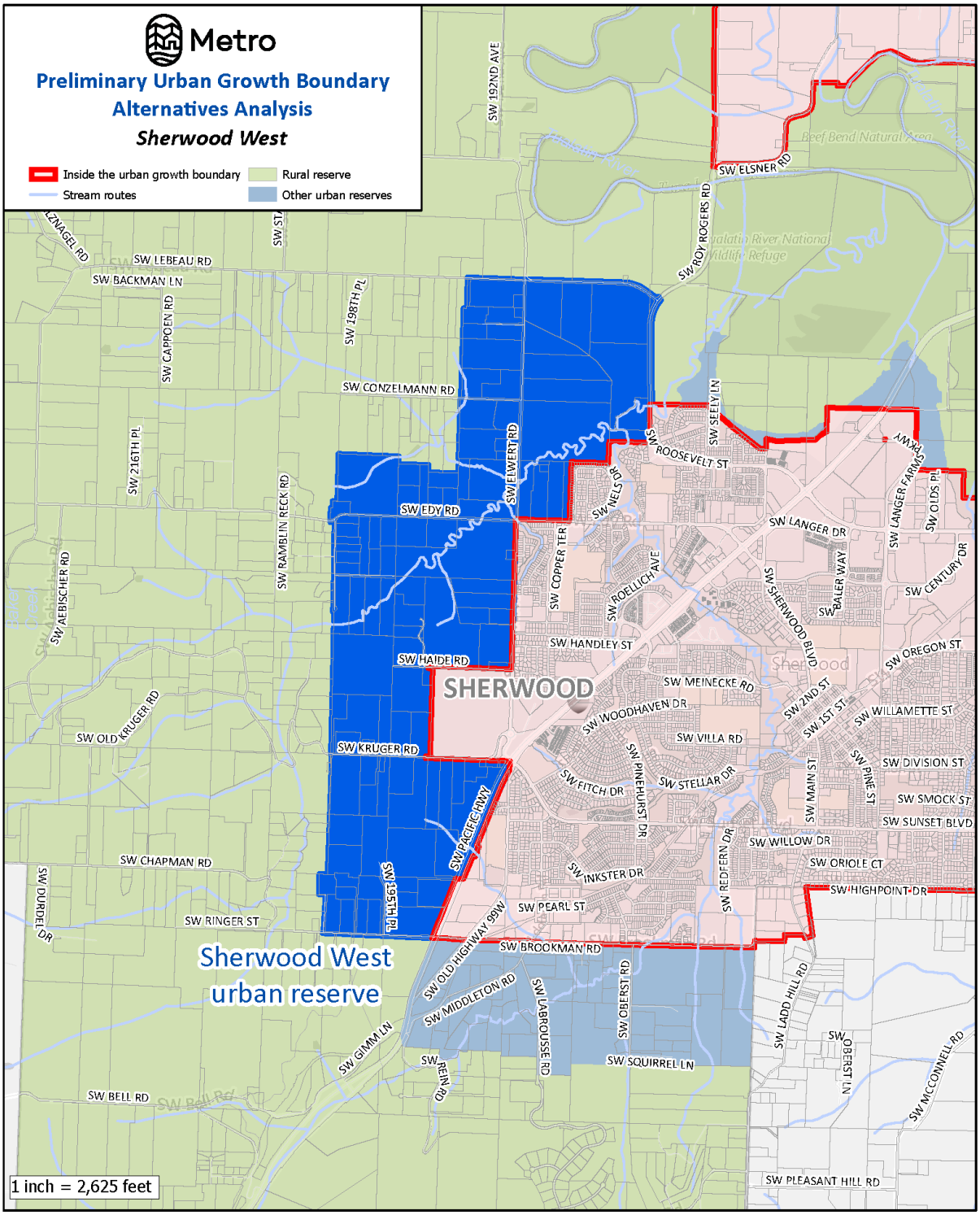
CITY OF SHERWOOD READINESS

Based on the draft 2024 Urban Growth Report (UGR) in addition to discussions at the Metro Council, MPAC, MTAC and the Urban Growth Report Roundtable as well as comments received during the public comment period, Metro staff believe there is a regional need to expand the UGB to provide more land for housing and job growth. Staff also encourage the Metro Council to set clear expectations for areas added to the boundary, so the expansion addresses not just local interests, but regional needs.

The City of Sherwood has completed extensive work to propose a UGB expansion for the Metro Council's consideration. The expansion proposal indicates that Sherwood is ready to take meaningful steps toward getting homes and businesses built in the proposed UGB expansion area. The Sherwood West Concept Plan includes proposed land uses to support up to approximately 5,500 housing units and 4,500 jobs. For those reasons, staff recommend that the Metro Council consider expanding the region's UGB to include the Sherwood West urban reserve.

Considerable work remains if the Metro Council chooses to add this area to the UGB. As part of this recommendation, staff encourage the Council to identify conditions ensuring that land added to the UGB will address a range of housing needs and provide industrial sites likely to attract family wage manufacturing jobs.

Figure 1: Recommended UGB expansion in the Sherwood West urban reserve



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The following pages of this report describe additional considerations that inform this staff recommendation.

THE REGION NEEDS MORE HOUSING OF ALL TYPES

It is well known that there is a national housing shortage, as well as housing shortages in Oregon and in the greater Portland region. This is reflected in housing prices and rents that remain high and in the growing number of people experiencing housing instability or houselessness. With the expectation that population growth will continue in our region – irrespective of the rate of that growth – we need more housing to be built.

The vitality of every community depends on having a diverse range of people from all backgrounds doing a broad range of work: teachers, contractors, daycare providers, nurses, and grocery store workers to name a few. As home prices rise and demand outstrips supply, we need to do more to provide housing opportunities for these essential workers in every community. Likewise, we need to provide housing options that suit people from all life stages: students seeking rental housing, growing families that need an additional bedroom, retirees seeking to downsize but remain in their community.

The primary question addressed by the Urban Growth Report is not just whether more housing is needed but whether there is enough space inside the existing UGB to meet that need. Land already available within the UGB provides opportunities for a diverse range of housing. The region's track record, as documented in the 2024 UGR, shows that there is considerable market demand for urban housing close to transit, services, and amenities. Recent statewide allowances for 'middle housing' such as townhouses and duplexes are producing results, and we expect that more of these housing options will be provided in the future.

The draft UGR also indicates that, depending on our assumptions about the future, there is potentially a need for additional land to meet the region's need for additional housing. As we consider bringing new areas into the UGB, we must make sure those areas will address the needs of a wide variety of households.

REGIONAL NEED FOR UGB EXPANSIONS FOR HOUSING

Under state law, the UGB can only be expanded when there is a demonstrated regional need for additional capacity to accommodate the next 20 years of forecasted growth. The analysis in the draft 2024 UGR's range of growth estimates shows that the Metro Council has the latitude to determine that a need for more land exists.

Housing capacity

The draft 2024 UGR describes a range of possible housing growth capacity currently available within the urban growth boundary. The specific amount of housing capacity available within that range depends on expected market conditions and development responses. Consistent with the recommendation to plan for the baseline forecast described in the following

paragraph, staff recommend capacity assumptions that fall within the middle of the ranges established in the draft 2024 UGR.

For the 2024 growth management decision, staff recommend that the Metro Council base their decision on a finding that there is capacity inside the UGB for 175,500 additional homes. Details about that assumed growth capacity can be found in Attachment 1 to this recommendation and in the draft 2024 UGR.

Household forecast and capture rate

As a basis for this growth management decision, staff recommend that the Metro Council plan for the baseline forecast for the seven-county Metropolitan Statistical Area (MSA) for the 2024 to 2044 period. The baseline forecast describes the most likely amount of growth for the region. This means planning for approximately 315,000 more people and 203,500 more households in the MSA.

The UGB "capture rate" is used to describe the share of seven-county household growth that is expected to occur in the Metro UGB. For discussion purposes, the draft 2024 UGR scenarios assumed a 70 percent UGB capture rate. Staff have heard partner opinions and share optimism that the region will regain its reputation as an attractive place to live and work. Staff therefore recommend that the Metro Council consider planning to accommodate slightly more than 70 percent of the MSA's household growth in the Metro UGB.

Notwithstanding recent declines after the pandemic-induced recession, this would represent a continuation of the historic upward trend in Metro's UGB capture rate for household growth. Adding the Sherwood West urban reserve to the UGB can provide a means of achieving this slightly higher capture rate by attracting household growth that may otherwise occur outside of the Metro UGB.

Staff recommend that the Council plan for 176,500 to 180,800 additional homes in the Metro UGB to meet current and future housing needs. Additional details about how those numbers are derived can be found in Attachment 1 and in the draft 2024 UGR.

Housing capacity deficits

Comparing UGB housing growth capacity (175,500 homes) and housing needs (176,500 to 180,800 additional homes) indicates a potential deficit of capacity for 1,000 to 5,300 homes. Additional details about those deficits can be found in Attachment 1.

Depending on the mix of housing it includes, the Sherwood West urban reserve could meet the range of identified regional housing capacity deficits. The adopted Sherwood West Concept Plan describes a range of 3,117 (9.2 dwelling units/acre) to 5,582 (16.4 dwelling units/acre) homes.

PLANNING FOR JOB GROWTH

Future job growth requires more workers to fill those jobs. This means that our job growth forecast should be generally consistent with our expectations for population growth. Consequently, as with population and household growth, staff recommend planning for the baseline employment forecast, which estimates the most likely growth scenario.

Today, there are approximately 1,261,200 jobs[1] in the seven-county MSA. Staff recommend planning for an increase of approximately 110,000 jobs, for a total of 1,371,400 jobs in the MSA by the year 2044.

Based on long-term trends, staff recommend planning for 75% of the new MSA-level jobs in the Metro UGB.[2] Today, there are approximately 996,600 jobs in the Metro UGB. By 2044, an additional 82,500 new jobs are anticipated, for a total of 1,079,000 jobs within the Metro UGB.

NEED FOR LARGE INDUSTRIAL SITES TO ACCOMMODATE HIGH-TECH MANUFACTURING GROWTH

Using the baseline employment forecast, the draft 2024 UGR identifies a surplus of 4,550 acres of industrial land in the region. However, as also explained in the draft UGR, most of the region's industrial land supply consists of smaller parcels with an average lot size of 3.8 acres and a median lot size of 1.7 acres. Although these smaller industrial spaces are in demand, they cannot serve the needs of the entire industrial market. The draft UGR describes a shortage of larger industrial sites for the expansion of existing businesses and recruitment of companies from outside the region; in particular, there is a lack of unconstrained parcels with relatively flat slopes and proximity to transportation facilities that could be aggregated into larger 50+ acre industrial sites.

The 2022 Oregon Semiconductor Taskforce Report identified a statewide need for four sites of 50 to 100 acres suitable for high tech manufacturers. As described in the draft UGR, the greater Portland region is the heart of the state's high-tech economy; however, the current regional inventory does not include enough industrial sites with characteristics that are suitable for addressing this need.

High tech manufacturing has become a major focus of incentive programs from the federal government designed to increase domestic production of critical technologies. Our region has significant competitive advantages in designing and manufacturing technologies to help adapt to and mitigate climate change and improve global connectivity. Staff analysis indicates that our region lacks enough available and unconstrained sites of sufficient size, slope, and proximity to

[1] These figures are for non-farm jobs because the task of growth management decisions is to estimate land need for urban uses.

[2] The draft 2024 UGR employment land demand analysis incorporates different UGB capture rates for different sectors. 75% is the historic UGB capture rate for the 1979-2022 period across all non-farm sectors.

existing transportation facilities and high-tech manufacturing clusters to allow for growth of these critical industries over the next 20 years. A lack of available sites would be a limiting factor in our region's ability to take advantage of historic incentives to support economic development.

Under Statewide Planning Goal 14, Metro is authorized to expand the UGB onto land that is suitable to meet a particular identified need based on specific site characteristics. Staff recommend that, based on the necessary site characteristics described above, the Metro Council address a need for two 50+ acre sites by expanding the UGB to include the mixed employment area in the north end of the Sherwood West concept plan. Staff further recommend that the Metro Council consider conditions of approval to protect these important large sites to help ensure that they will address the identified need.

ADDITIONAL LANDS TO SUPPORT COMMERCIAL JOB GROWTH

The draft 2024 UGR identified a baseline deficit of 320 buildable acres to support expected commercial job growth. Sherwood has included at least 135 acres for commercial employment in its concept plan. Staff recommend that the Metro Council address the commercial land need described in the UGR by expanding the UGB to include the Sherwood West urban reserve. The remaining deficit beyond that addressed by a potential expansion is within the margin of error for a long-range land need analysis. To the extent that there may be additional demand for commercial land, staff expect that demand would be addressed through additional redevelopment.

POTENTIAL UGB CONDITIONS OF APPROVAL

With the goal of expanding housing choices and reducing housing costs, protecting industrial sites, and continuously improving engagement for planning efforts, staff recommend that the Council consider conditions on the proposed UGB expansion. The bullets below provide suggestions for several topics that could be addressed by conditions of approval. Generally, these recommended conditions reinforce the work that the City of Sherwood has done in its Sherwood West Concept Plan. For example:

- In order to achieve a mix of housing types, the Metro Council could establish an expectation for a minimum number of homes. This could fall within the range proposed by the City of Sherwood's adopted Sherwood West Concept Plan (base density of 9.2 units per acre to a maximum density of 16.4 units per acre). The difference between these reflects the actualization of "missing middle" housing allowed by HB 2001 (2019). The city of Sherwood would determine housing mix details in their comprehensive planning process.
- The greater Portland region is in an affordable housing crisis. We need more housing options for people who make less than the region's median income (currently $116,900 for a family of four). Sherwood elected officials and staff have expressed an interest in

creating opportunities to live and work in their community. That will require us to work together to ensure housing affordability and not just leave it up to the market. The Metro Council could set out conditions to guide this work.

- Staff's recommendation to create and protect large industrial sites is intended to achieve widely shared goals to grow our region's high-tech manufacturing sectors. The Metro Council could consider specific goals or restrictions to make sure this happens.
- Creating inclusive communities means bringing a variety of perspectives into the planning process. Staff recommend a broad-based approach to community engagement that goes beyond collecting input from those who currently live near the expansion or those who have typically engaged in city planning – and include community members and Community Based Organizations representing historically marginalized groups. Staff also recommend inviting interested Tribes to engage in the city's planning processes.

ADDITIONAL RECOMMENDATIONS

Improve how we assess equity in growth management decisions

For many years, Metro has had the goal of addressing racial equity in its work, including urban growth management decisions. We've tried several approaches including:

- Using the Regional Equity Atlas to provide decision makers with contextual information.
- Requiring cities proposing expansions to describe how they are working to advance racial equity.
- When we've expanded the UGB, requiring and supporting cities in conducting broad-based community engagement for their comprehensive planning.
- Assessing equity outcomes in past UGB expansion areas.

In keeping with our tradition of always seeking to learn and do better, staff recommend that Metro Council direct staff to work with its advisory committees to identify possible amendments to Title 11 of the Urban Growth Management Functional Plan to require local governments to complete equity assessments when concept planning for new urban areas.

Consult with Tribes

Tribes are independent sovereigns with inherent powers of self-government and relationships with the U.S. government that derive from treaties, federal law and executive orders. These Federal-Tribal relations are political and do not derive from race or ethnicity. Treaties are listed among the elements that make up "the supreme law of the land" under Article VI of the U.S. Constitution.

The lands now known as the greater Portland metropolitan area are part of the aboriginal homelands, traditional use areas and trade networks of numerous Tribes. For millennia, Indian people resided throughout the Willamette Valley and along the Willamette and Columbia Rivers

and their tributaries in traditional villages, permanent communities and seasonal encampments. The relationship of Tribes, their lands and interests extend from time immemorial to the present day and beyond. Each Tribe's interests are distinct. These interests may overlap and intersect with the urban growth boundary in various ways.

Metro and other local governments need to do a better job of consulting with Tribes on growth management and land use issues that have the potential to impact tribal interests and priorities such as treaty rights, the protection of sensitive cultural resources, or enhancing the welfare of tribal members residing in urban areas off reservation. For that reason, staff recommend that Metro Council direct staff to work with interested Tribes, Metro's Tribal Affairs program and its advisory committees to identify possible amendments to Title 11 of the Urban Growth Management Functional Plan to require local governments to consult with Tribes when concept planning and comprehensive planning new urban areas. Staff also recommend that Metro identify opportunities to ensure and improve Metro's Urban Growth Report technical analyses are inclusive of relevant tribal priorities, expertise, and data sets.

Revise how we accounted for slopes on employment lands

Recent discussions at the UGR Roundtable and the Metro Policy Advisory Committee (MPAC) have raised questions about the assumptions staff make when inventorying buildable employment lands. We have heard questions about our assumed thresholds for steep slopes and whether some of those lands are viable for development.

Based on their professional expertise and review of other jurisdiction's work, Oregon Department of Land Conservation and Development staff have recently advised Metro to use a 10% slope threshold when inventorying buildable employment lands. Staff will revise the UGR analysis of employment land capacity to follow that advice. That revised analysis will be included in the final UGR presented for Metro Council adoption later this year.

Using this more conservative slope threshold does not change the analysis in the draft 2024 UGR that the baseline forecast indicates there is enough industrially-zoned land inside the UGB to match generally expected job growth, at least before assessing a more specific need for additional land with particular site characteristics. Most importantly, it doesn't change the fact that we collectively need to focus on the investments and actions necessary to make sure more of these employment lands are shovel-ready to capitalize on economic development opportunities. That includes necessary regional discussions about site aggregation, brownfield remediation, infrastructure financing, zoning changes, incentive programs and more.

Update the region's vision for its future

Our region had the foresight 30 years ago to adopt the region's Future Vision and 2040 Growth Concept. These long-range plans helped guide how greater Portland has responded to population growth in a way that reflects shared community values. The Growth Concept has

served us well and has positioned us to address the challenges of climate change and racial equity, but we know there's more work to be done to prepare for these and other future issues.

A lot has changed since the region adopted the Future Vision and the 2040 Growth Concept. Staff will bring a work program to Metro Council to renew the Future Vision and 2040 Growth Concept in Fall 2024. This work will help address many, though not all, topics and potential actions that came up while developing this urban growth management recommendation.

This work program should include an assessment of how these existing plans have performed for the region's residents: what has worked well or turned out as envisioned, and where there is still work to do or turned out differently from the vision. While we believe the fundamentals of the Vision and Growth Concept are still relevant, it is essential to demonstrate this through study.

Planning for 25 and 50 years in the future also requires understanding where today's trends may potentially take the region. The work program should include investigation of how climate change, demographics, technology, and other topics will change in the coming decades and how visioning can prepare the region to adapt to these shifts.

The updates of these long-range plans must also capture topic areas not currently addressed in the 1995 versions of these documents that are of greater importance and interest today. These include, but are not limited to: racial equity, climate resilience and adaptation, arts and culture, anti-displacement strategies, and Tribal relations. Updates must also address how Metro's purview has changed since 1995 to encompass major roles in the region's housing and parks and natural areas.

PUBLIC COMMENTS

Metro held a public comment period from the release of the draft UGR on July 9 through August 22. 349 survey responses were received during this period. We heard a variety of viewpoints about the draft Urban Growth report and the City of Sherwood's expansion proposal. Themes from comments about the expansion proposal include:

- Optimism about future growth potential, including the potential for a resurgence of high-tech manufacturing
- Interest in more housing and job opportunities in Sherwood, including housing choices for seniors, young families and other demographic groups
- Concern about the impacts of a potential UGB expansion on traffic, with the lack of transit options available in Sherwood
- Concern about impacts on farmland and agricultural activities
- Importance of housing affordability
- Concern about impacts on the environment and climate change
- Concern about impacts of new development on existing public infrastructure leading to tax increases for current residents
- Concern about potential impacts on schools

- Recommendation to use land within the UGB before expanding

We also received input about the methodology of the draft UGR. Themes include: suggestions for different approaches to the buildable land inventory, population projections, and density estimates.

These comments highlight the variety of issues that need to be balanced by the UGR. While this staff recommendation does not address every technical topic raised, it acknowledges that the UGR is a point-in-time document that seeks to balance interests and provide a reasonable range of estimates for the Metro Council to determine whether to expand the UGB and accept the City of Sherwood's proposal.

TIMELINE (SUBJECT TO CHANGE)

August 26, 2024:	Release COO recommendation
August 28, 2024:	MTAC discussion of COO recommendation and public comment themes
September 5, 2024:	Council work session on COO recommendations and public comment themes; (*full public comment summary provided at Council meeting*)
September 11, 2024:	MPAC discussion of COO recommendation and recommendations to Council; request any final MTAC advice
September 18, 2024:	MTAC advice to MPAC, if requested
September 19, 2024:	CORE recommendation to Council
September 25, 2024:	MPAC recommendation to Council
September 26, 2024:	Council holds public hearing on COO recommendations
October 8, 2024:	Council provides direction to staff at work session
November 21, 2024:	Council first reading of ordinance; public hearing
December 5, 2024:	Council second reading of ordinance; decision

ATTACHMENT 1: HOUSING CAPACITY, NEED, AND DEFICIT ASSUMPTION DETAILS

The tables below include specific numbers, but long-term estimates cannot be expressed this precisely. For that reason, the final totals are rounded to the nearest hundred.

Table 1: Recommended housing capacity assumptions (Metro UGB, 2024-2044)

	UGB Capacity Assumptions (number of homes)			
	single-detached	middle housing	multifamily	Total
Vacant land (larger mix of single-unit detached)	34,944	13,228	42,970	91,142
Redevelopment (Baseline)	12,292	11,727	24,382	48,400
Concept plan areas and planned development on vacant land	9,096	6,662	4,138	19,896
Other planned redevelopment	135	172	9,830	10,137
Office-to-residential conversion (baseline)	-	-	1,000	1,000
ADUs and middle housing conversion/infill (low)	-	4,955	-	4,955
Total UGB capacity (rounded)	**56,500**	**36,700**	**82,300**	**175,500**
Capacity housing mix	32%	21%	47%	100%

Table 2: Recommended Metro region current and future housing need assumptions (2024-2044)

7-county MSA baseline household growth (2024-2044)	203,530
Future household growth in Metro UGB (70% to 72% Metro UGB capture)	142,500 to 146,500
Add 5% vacancy rate (to convert future households to homes)	7,100 to 7,400
Subtotal of UGB future housing needs (number of homes)	149,600 to 153,900
Add current housing needs (underproduction, houselessness, 2nd and vacation rentals)	26,953
Total current and future UGB housing need (2024-2044, rounded)	176,500 to 180,800

Table 3: Metro UGB current and future housing need and deficit assuming 70% UGB capture

	UGB Housing Need at 70% UGB Capture			
	single-detached	middle housing	multifamily	Total
Future need: baseline forecast (see Table 1)	56,846	32,911	59,838	149,594
Units lost to 2nd and vacation homes	1,072	1,769	443	3,285
Historic underproduction	726	2,089	12,160	14,975
Households experiencing houselessness	-	40	8,653	8,693
Total Housing Need (rounded)	**58,600**	**36,800**	**81,100**	**176,500**
Needed housing mix	33%	21%	46%	100%
Total UGB capacity (rounded)	56,500	36,700	82,300	175,500
Deficits (rounded)	**(2,200)**	**(100)**	**1,200**	**(1,000)**

Table 4: Metro UGB current and future housing need and deficit assuming 72% UGB capture

	UGB Housing Need at 72% UGB Capture			
	single-detached	middle housing	multifamily	Total
Future need: baseline forecast (see Table 1)	58,470	33,851	61,547	153,868
Units lost to 2nd and vacation homes	1,072	1,769	443	3,285
Historic underproduction	726	2,089	12,160	14,975
Households experiencing houselessness	-	40	8,653	8,693
Total Housing Need (rounded)	**60,300**	**37,700**	**82,800**	**180,800**
Needed housing mix	33%	21%	46%	100%
Total UGB capacity (rounded)	56,500	36,700	82,300	175,500
Deficits (rounded)	**(3,800)**	**(1,000)**	**(500)**	**(5,300)**

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Auditor

Brian Evans
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1700

2024 growth management decision

Public comment report

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A summary of comments received during the comment period for the 2024 Urban Growth Report and Sherwood West Expansion Proposal from July 9 to Aug. 22, 2024.

September 2024



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APPENDIX B: PUBLIC COMMENT EMAILS AND LETTERS B1

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PURPOSE AND BACKGROUND

As new people move to the greater Portland region and businesses create more jobs, our region's urban growth boundary (UGB) serves to focus development within the boundary. The focused development helps stretch limited public dollars that build and maintain the streets, water and sewer pipes, schools and parks that every community needs. Focusing development within the UGB also helps protect high-quality farmland, forests and natural habitats.

Every six years, the state directs Metro to assess whether there is enough land inside the urban growth boundary for the next 20 years of job and housing growth. These periodic decisions also provide an opportunity to support the 2040 Growth Concept, greater Portland's vision for growth. The Growth Concept envisions the region's growth in town centers and urban corridors and guides UGB expansions into urban reserves–areas best suited for future development–after careful consideration of whether those expansions are needed.

To make an urban growth management decision, Metro assesses trends for a variety of factors, from changes in population growth, household size and consumer desires to the future of workplaces and transportation. Metro publishes these assessments in the urban growth report.

If there is a regional need for land to accommodate the next 20 years of jobs and housing growth, Metro Council can consider expanding the greater Portland region's UGB. However, the region has learned that adding more land alone is not enough. Expansion areas only produce jobs or housing when a city can provide infrastructure like pipes, roads, sidewalks, parks, and schools.

If a city decides that it is ready to expand the UGB into urban reserves, the city must be ready to support development. A city demonstrates its readiness with a concept plan. A concept plan lays out the vision for the area, intended land uses, transportation network, environmental protections, additional necessary infrastructure and funding sources. Cities that are interested in expansion must submit an expansion proposal with a concept plan to Metro for consideration, along with governmental agreements, letters of support and findings.

For the 2024 urban growth management decision cycle, Metro received one proposal from the City of Sherwood to expand the UGB to include the 1,300-acre Sherwood West urban reserve area. If Metro Council determines more land is needed in the UGB to support the next 20 years of growth, they will also determine how Sherwood's proposed expansion will accommodate the needs described in the urban growth report.

From July 9 to August 22, 2024, Metro asked residents of the greater Portland region for their thoughts on the 2024 draft Urban Growth Report and the City of Sherwood's expansion proposal. Metro Council will consider public comments as they make an urban growth decision.

PUBLIC COMMENTS AT A GLANCE

From July 9 to August 22, 2024, Metro held a public comment period, inviting feedback on the draft 2024 Urban Growth Report and an urban growth boundary expansion proposal from the City of Sherwood. During the public comment period, Metro invited comments and feedback from members of the public, community and business organizations, regional advisory committees, agency partners and policymakers.

This public comment period builds on public involvement throughout the urban growth management process. Learn about the ideas and feedback provided by 15 youth who met regularly through the urban growth management process.

Metro received **72** email comments and 365 responses to an online survey.

Public comments included a variety of viewpoints about the draft Urban Growth report and the City of Sherwood's expansion proposal. Themes from comments provided in emails and the online survey about the expansion proposal include:

- Optimism about future growth potential, including the potential for a resurgence of high-tech manufacturing
- Interest in more housing and job opportunities in Sherwood, including housing choices for seniors, young families and other demographic groups
- Sentiment that the expansion is not needed at all or is not needed at the proposed site
- An interest in more infill development before the urban growth boundary is expanded
- Concern about the need for more housing, a diversity of housing and housing that is affordable
- Concern about the impacts of a potential UGB expansion on traffic; some comments pointed to limited transit options available in Sherwood
- Concern about the impacts of a potential UGB expansion on farmland and agricultural activities in the area
- Concern about potential impacts of a potential UGB expansion on the environment and climate change
- Concern that new development would have an impact on existing public infrastructure leading to tax increases for current residents

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PUBLIC COMMENT PERIOD OVERVIEW

During the public comment period, there were a variety of resources available for review and several platforms available for submitting feedback and comments:

- **Public review draft materials**: The project webpage included the draft 2024 Urban Growth Report and City of Sherwood's expansion proposal for Sherwood West. The report and the expansion proposal were also summarized in an executive summary and factsheet that were available in English and Spanish. With a variety of informational resources, the public comment period allowed people to engage at the level of detail that worked best for them.

- **Comment platforms**: There were several ways for people to provide comments including an online survey, email, letter and voicemail.

- **Online survey**: An online survey was available and publicized in English and Spanish. The survey asked participants to prioritize primary factors for expanding the urban growth boundary, asked for feedback on the expansion proposal, and also provided space for participants to describe what they want preserved and what they want to see change as the region grows.

- **Notifications and notices**: Public notices of the comment period were provided to local neighborhood involvement and community outreach offices at jurisdictions across the region. Notifications were sent to community-based organizations, Metro regional advisory committees and their respective interested parties. Metro also posted the public comment period on social media and Metro News. Flyers with QR codes were posted in Sherwood and City of Sherwood and Metro staff promoted the public comment period at Sherwood's Robin Hood Festival.

- **Public hearings**: Metro Council will receive testimony about the urban growth management decision in-person, online or in writing at a public hearing on Sept. 26 and at the first reading of the ordinance on Nov. 21, 2024.

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ONLINE SURVEY RESULTS

The online survey provided overviews of the urban growth decision process, the Urban Growth Report and the Sherwood West proposal. The survey also linked to the summarized materials in English and Spanish on the project webpage as well as the unabridged Urban Growth Report and expansion proposal. The survey asked participants six questions about growth and nine optional demographic questions. A total of 365 respondents participated in the online comment survey. A summary of the survey follows, and the results are included in Appendix A.

The survey included the following questions:

- After reviewing the Draft Urban Growth Report, is there something you think was not adequately considered in the report that you would like decision-makers to know about? (total responses=247)
- Which factors do you think are most important as a city prepares for expansion? Please rank in order of importance. (total responses=312)
- Please provide your comments on the Sherwood West proposal. (total responses=182)
- Is there anything else that you would like the Metro Council to consider as they make a decision about whether to expand the Urban Growth Boundary as described in the Sherwood proposal? (total responses=218)
- What do you most want to see preserved as greater Portland continues to grow? (total responses=340)
- What changes would you like to see as greater Portland continues to grow? (total responses=340)

Survey respondents were asked to provide their zip code. This question was optional, and 284 survey participants responded. More than 143 respondents submitted a Sherwood zip code.

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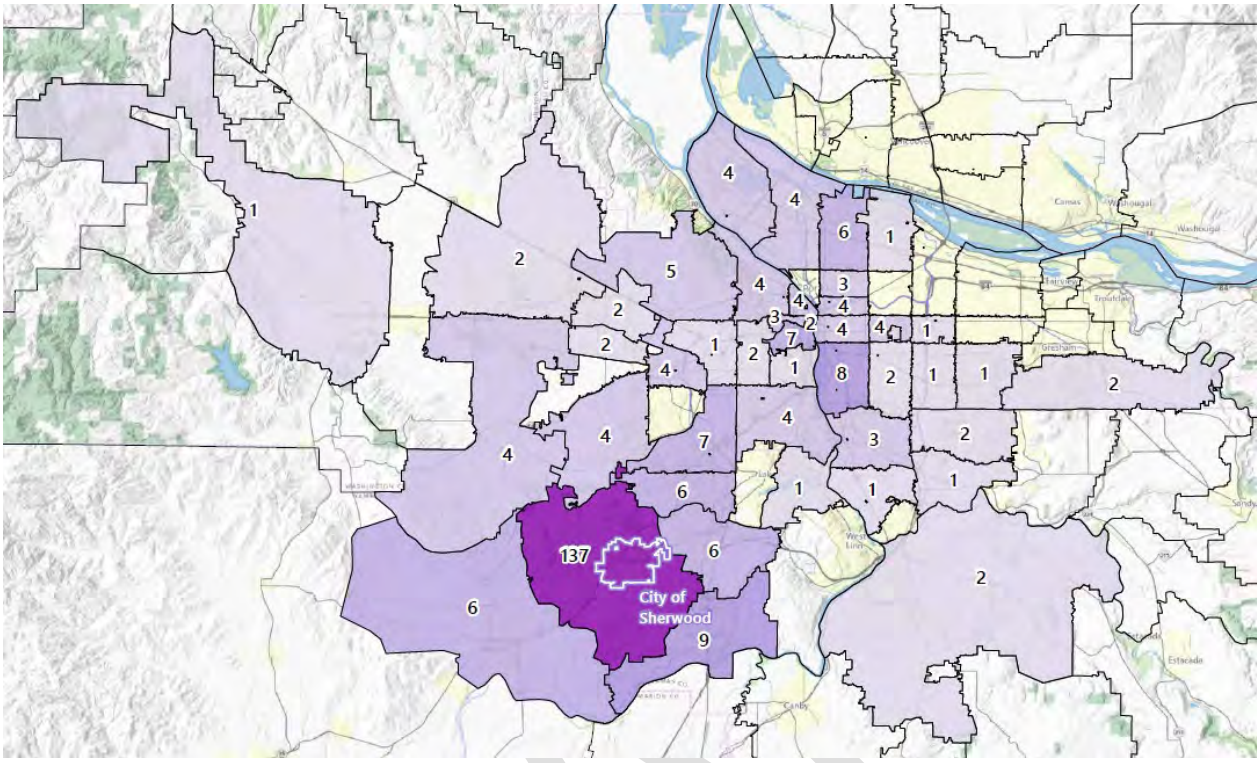
Figure 1: Survey respondents zip codes



Survey comments on the Draft 2024 Urban Growth Report and the Sherwood West concept plan

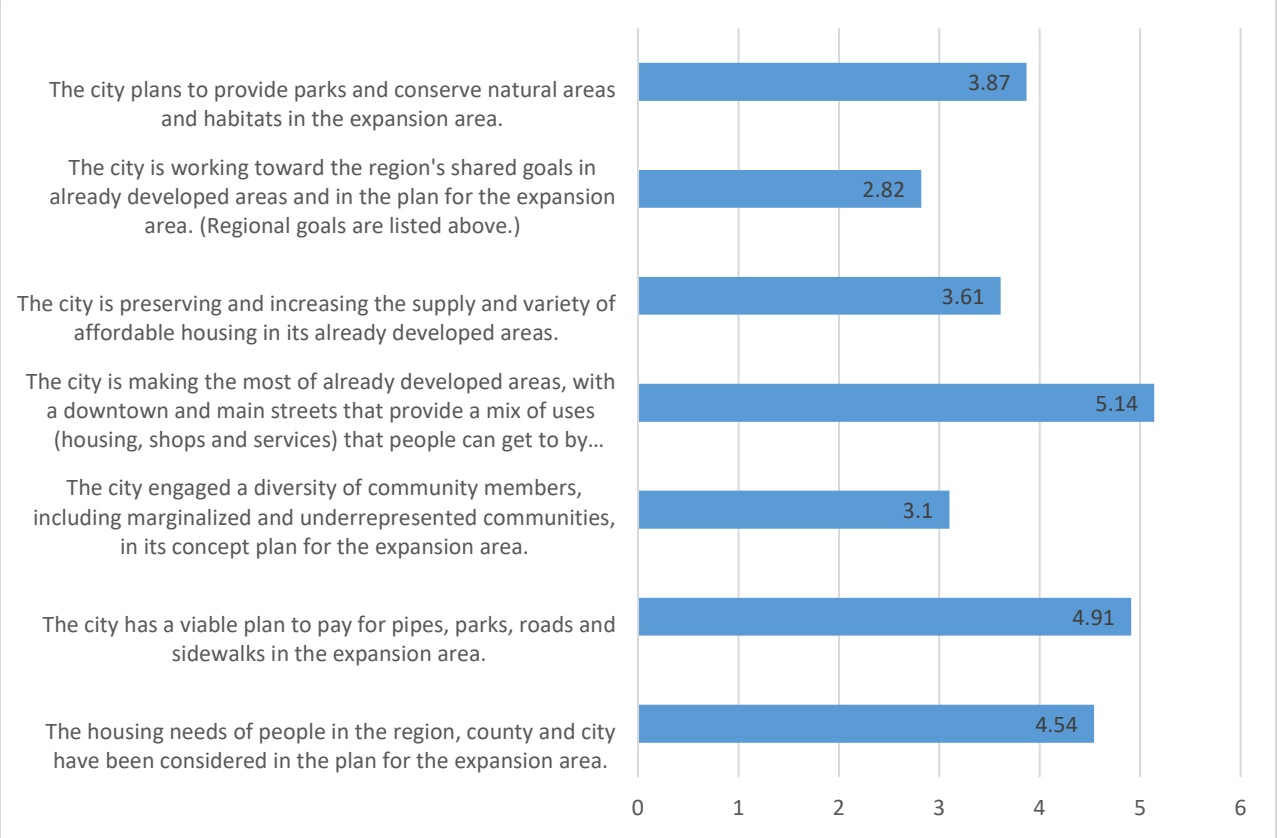
Survey participants were invited to review the City of Sherwood's expansion proposal and Sherwood West Concept Plan and/or the fact sheet summarizing the proposal. Key elements of the proposal were also summarized in the survey.

The survey included a summary of the factors Metro considers when reviewing an expansion proposal from a city and asked survey participants: **Which factors do you think are most important as a city prepares for expansion? Please rank in order of importance. (Total responses= 312)**

Survey respondents ranked the top three factors as most important. These factors are also reflected in the comment themes. The top three factors are:

- The city is making the most of already developed areas, with a downtown and main streets that provide a mix of uses (housing, shops and services) that people can get to by walking and rolling.
- The city has a viable plan to pay for pipes, parks, roads and sidewalks in the expansion area.
- The housing needs of people in the region, county and city have been considered in the plan for the expansion area.

Figure 2: Responses to: "Which factors do you think are most important as a city prepares for expansion? Please rank in order of importance?" (Total responses= 312)



The survey included three open-ended questions that elicited comments about the City of Sherwood's proposed expansion. There were very few comments on the Draft 2024 Urban Growth Report. The responses to the following three questions are summarized below by theme. For the complete set of comments see Appendices A-1, A-2 and A-3.

Q: After reviewing the report, is there something you think was not adequately considered in the report that you would like decision-makers to know about? (Total responses=247)

Q: Please provide your comments on the Sherwood West proposal in the box below. (Total responses: 182)

Q: Is there anything else that you would like the Metro Council to consider as they make a decision about whether to expand the Urban Growth Boundary as described in the Sherwood proposal? (Total responses=218)

Most respondents opposed the expansion or questioned the need for an expansion. The most frequently cited reasons for opposition were the loss of farmland, natural resources and traffic impacts, and concerns about the tax burden on existing residents caused by the cost of new

infrastructure. Commentors expressed a desire for Sherwood and the region to make use of land already in the UGB and questioned the need for the expansion or the entirety of the proposed expansion given the expected rate of population growth. Supportive comments emphasized the need for housing and some highlighted the demand for single family housing while others expressed support for the mixed-use development proposed in the concept plan. The following are a list of the prominent issues across the survey responses with sample comments that address each issue:

- **Make use of land in the UGB**
- **There is not a need to expand**
- **An expansion will exasperate traffic congestion and safety issues.**
- **Transit is needed**
- **Building and maintaining infrastructure for new development is too costly**
- **Preserve farmland**
- **Preserve and protect natural and historic/cultural resources**
- **Climate change impacts need to be considered.**
- **More land is needed for housing and to support the single-family housing people want.**
- **Support for the expansion proposal**
- **Engage the Sherwood community**

Make use of land in the UGB

- "We have an abundance of property that is currently in the boundary. Use that effectively and build up and not out. "
- "Sherwood Oregon has a near city wide ban on apartments. They should not be granted a UGB expansion before they show true need. Build some apartments Sherwood first!"
- "We need to cheerlead all residential development and continue to chop down fees and rules until we get a deluge of infill development. it will make our place more financially productive, affordable and livable."
- "To accomplish regional goals, and even to create a healthy Sherwood, we must develop existing land within the UGB so we can create financially and environmentally sustainable population growth."
- "Lastly, the City has not maximized the current boundaries for affordable housing and jobs."
- "Work on densifying existing neighborhoods instead of focusing on sprawl."
- "The transportation connections are poor, and our region has no shortage of buildable land already in the UGB. We need infill, not more fire-prone sprawl into farms and forests."
- "I encourage Council to be extremely cautious about expanding the UGB. We should focus on further developing our existing area within the UGB rather than expanding Sherwood at this time."

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- "There is a plethora of empty warehouses and houses that can be renovated. Do this before taking any more farmland to build more buildings."
- "The city has plenty of room for development inside city limits. In addition king city has already expanded and is working on developing a large residential area just down the road."
- Rather than building more outside of the UGB, let's focus on creating better spaces on the land that's already allocated. Densify current areas, we don't need to increase sprawl more.

There is not a need to expand

- "I am all for growth in a measured & logical manner when the need arises. There is no evidence that supports an inclusion of this magnitude."
- "Being a property owner in the proposed expansion area who farms the land this expansion pushes us closer to losing our lively hood. Developers are continually contacting us and wanting to purchase our property. We are not interested. This is a very large expansion request. Is all or any of this land really needed now?"
- "For the Sherwood West expansion plan that was submitted in 2016 doesn't reflect the more recent population decline. The concept plan should be scaled back to reflect more current data and the UGB expansion should be 50% the original submission."
- "Sherwood, Wilsonville, and Tualatin are currently in the process of wasting one of the largest industrial sites already within the UGB by each separately seeking development, often on small, 10 acre parcels. At a time when some think the region needs more large industrial parcels, these jurisdictions are wasting a huge area, already within the UGB, that should be developed as a single unit."
- "I suggest that the Metro Council take into consideration the dearth of expansion options being presented as further evidence that the demand for growth actually isn't there."
- "Even the small baseline growth assumption seems optimistic. Developing suburban land will not create "affordable housing" in locations where it is needed."

An expansion will exasperate traffic congestion and safety issues.

- "How will expansion and development of high density housing and business along this route between Roy Roger's, Lebeau, Elwert, and Edy roads not contribute to further traffic issues and noise?"
- "A UGB expansion in a part of the metro area poorly served by transit and likely to be entirely car dependent does not align with any of our regions goals. As such, it's unclear why it's being considered."
- "Most new families that would live in the homes planned would work elsewhere. Traffic congestion will increase."

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- “Traffic on and off of Hwy 99 has major delays during rush hours. These conditions have persisted for years and will only worsen if all of Sherwood Wes tis brought in at this time. The City and County need to improve the capacity of Elwert Road,and it's Hwy 99 connection before adding so many homes.”

Transit is needed

- “However, people will want to get out of their neighborhood to access amenities, and there are not very many options for how they will do that. This makes living in the area less accessible for people with disabilities who cannot drive (like my own father) or younger people who cannot afford a car.”
- “Keep public transportation strong so I can go places. I work part-time and still drive car but not for long so please don't disregard the needs of older people like me.”
- “This project would make more sense if it was built in conjunction with a WES regional rail spur but it lacks a Right of Way reservation to build such a line.”
- “Sherwood has the right ideas in mind with mixed developments and alternative transportation but they need to take them further, transit being extended into Sherwood west should also be explored...”
- “Light rail expansion on the 99 corridor”
- “I’m nervous about continuing to focus on roads instead of public transit, and if we want housing to be affordable and Sherwood to be accessible to folks, it needs to move away from single family homes."

Building and maintaining infrastructure for new development is too costly

- “The sewer, water and gas lines have to be upsized downstream/upstream from the development and the current tax payer gets to pay for that.”
- “We aren't as dense and suburban neighborhoods don't pay for themselves in taxes once they start to require maintenance. If we built denser on our existing roads, we might actually have the tax base to support them.”
- “Based on the Sherwood West expansion proposal, I do not think that the City of Sherwood adequately demonstrates that infrastructure development is feasible.”
- “Also you are going to burden the current property owners with additional taxes for improving infrastructure, roads, schools, and fire stations that these 5,580 homes will require.”
- “The proposed infrastructure funding plan is vague at best. Relying on SDCs and ‘outside’ funding is insufficient. No expansion should be considered until there is a concrete committed plan for the infrastructure funding.”

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Preserve farmland

- "Consider where food will come from in 20 years if there are no farmlands to sustain the animals and crops."
- "The Report does not address the consequences of replacing fertile, productive land with houses and industry."

Preserve and protect natural and historic/cultural resources

- "Protecting historic and cultural resources."
- "Previously designated Title 13properties are now being planned to be light industrial with no thought for where the wildlife they are wiping out will go to."

Climate change impacts need to be considered.

- "The report did not consider the potential impacts of climate change, in terms of population increases in the Northwest due to cooler weather and water availability relative to other parts of the country, and also impacts of climate change on the wildland urban interface and how this could impact fire risk for the edges of the Portland area."
- "Is there consideration of preservation of trees and plants for carbon sequestration and other environmental benefits?"
- "We are in a climate crisis, and these trees help us by providing shade, sequestering carbon, preventing erosion, and providing wildlife habitat."

More land is needed for housing and to support the single-family housing people want.

- "...restrict supply and the inherent demand will cause price increases. If affordability is a key driver then ensuring adequate supply of land is fundamental to affordable housing."
- "Urban densities are reaching unsustainable levels. We have vast room to expand UGB's and we shod do so. Make a plan to double the amount of land available for residential development over the next 20 years."
- "We need more land made available for single family housing and just not for apartments."
- "I think Sherwood's specific analysis at the local level should be part of the Metro Council decision making. There's a strong argument to be made about where people want to live and work that doesn't always translate to regional land availability."
- We need to build more housing desperately and are not at risk of "overbuilding" - at worst this would reverse some of the run-up in prices due to past severe undersupply. I am in favor of allowing more housing to be built as much as possible.

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- "Expand the boundary the maximum amount possible! The region needs more single family homes-thousands more homes!"

Support for the expansion proposal

- "Creating more jobs than housing units would be a mistake. That said, I support the proposal."
- "Looking forward to more commercial zoning for jobs and businesses."
- "I'm in favor of development around the high school. Housing and mixed use should go into the surrounding acreage."
- "This expansion appears to be well thought out, and should be welcomed in the region. It is sad that the Sherwood West proposal is the only one."
- "I like the plan. I know there is an opposition group but there are those of us that support the plan too."
- "Don't let existing Sherwood residents vote down UGB expansions that are needed to help the region accommodate growth and affordability."
- "This expansion should have already happened before the School was built in 2015 - Newberg, Or has updated their area and we are left behind and deal with their traffic to Hillsboro"

Engage the Sherwood community

- "The Sherwood community needs to weigh in on the proposed north industrial zone."
- "Please consider the desires of the people who call Sherwood home."

Survey comments on about what is most important as the region grows and changes

Two survey questions asked for people to share their ideas about growth in greater Portland—what they want to see preserved and what they would like to see changed as the region grows. Responses to these questions are in Appendix A-4 and A-5. These comments will be considered in upcoming Metro planning processes, including the update to the region's vision and growth concept.

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COMMENTS VIA EMAIL, LETTERS AND PHONE

In addition to the online survey, residents, businesses and policymakers were invited to comment on the four city expansion proposals by letter, email and phone. Metro received 72 emails and no letters or comments on voicemail. A majority of the emails were submitted by Sherwood residents, landowners, agencies, elected officials and organizations with interest in the expansion. See Appendix B for the comment emails.

Supportive comment emails highlighted a variety of reasons for their support, including:

- More housing and more employment opportunities
- Addressing a lack of land supply
- Property owners who want their property brought into the UGB
- Sherwood' unique location providing an economic advantage

Comment emails in opposition highlighted a variety of reasons for their support, including:

- Loss of farms land
- Traffic congestion
- Tax burden of new infrastructure on existing residents
- There is enough land in the UGB
- Concern about concept plan not providing affordable housing options

Other issues raised include:

- Concerns about slope in expansion areas
- Input about the methodology of the draft UGR, including suggestions for different approaches to the buildable land inventory, population projections, and density estimates.
- Several comment emails encouraged Metro to use the high growth rate for population and employment.

WHO PARTICIPATED

Survey participants were asked to provide optional demographic information to help Metro know if participants were a representative group reflecting our diverse communities and a broad range of experiences in our region. Demographic groups that are underrepresented among survey respondents compared to the metropolitan Portland

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area demographics by 4 percent or more are highlighted in red. Greater Portland area demographics are sourced from the 2020 Census. *Demographic analysis to come.*

For complete demographic responses see Appendix A-6.

NEXT STEPS

The merits of Sherwood West's proposal will be the focus of policy discussions in the fall of 2024. Generally, decision-makers will consider whether:

- The housing needs of people in the region, county and city have been considered.
- Development of the proposed expansion area is feasible and supported by a viable plan to pay for needed pipes, parks, roads and sidewalks.
- The city has reduced barriers to mixed-use, walkable development in its downtowns and main streets.
- The city has implemented best practices for preserving and increasing the supply and diversity of affordable housing in its existing urban areas.
- The city has taken actions to advance Metro's six desired outcomes, with a particular emphasis on meaningful engagement of communities of color in community planning processes.

A final decision by the Metro Council on urban growth boundary expansion is expected in December 2024.

July 9, 2024:	Release draft UGR and appendices
August 22, 2024:	Public comment survey on draft UGR closes
September 5, 2024:	Council work session on COO/Staff recommendations
September 26, 2024:	Council holds public hearing on COO/Staff recommendations
October 1, 2024:	Council provides direction to staff at work session
October 14, 2024:	Measure 56 notices to property owners in proposed expansion areas
October 24, 2024:	35-day notice of proposed amendment to DLCD
November 4, 2024:	Postcards/report on potential impacts of UGB expansion on existing neighborhoods
November 21, 2024:	Council first reading of ordinance; public hearing
December 5, 2024:	Council second reading of ordinance; decision

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Mary Nolan, District 5

Duncan Hwang, District 6

Auditor
Brian Evans

600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1700

Sept. 3, 2024

APPENDIX A

Public comment online survey results

Q3 Read the Draft 2024 Urban Growth Report. Metro uses a wide variety of factors to assess whether there is enough land inside the greater Portland region's urban growth boundary for the next 20 years of job and housing growth. After reviewing the report, is there something you think was not adequately considered in the report that you would like decision-makers to know about?

Answered: 247 Skipped: 118

#	RESPONSES	DATE
1	The facts and informed opinions of the residents that are impacted by the growth plans.	8/23/2024 10:06 AM
2	Open up more buildable ground for affordable houses	8/22/2024 9:51 PM
3	Projections of growth are not lining up with actual. We are growing a lot slower, so back off.	8/22/2024 9:44 PM
4	How can you preserve farmland that borders the current UGB and not create urban sprawl w/no consideration to existing small business engaged in farming and farm related products	8/22/2024 9:38 PM
5	There is a large amount of unused land already in the UGB. This proposal is unnecessary and a wet kiss for developers.	8/22/2024 7:24 PM
6	Yes, that affordable housing is not created by shoddy buildings and neighborhoods made up of these shoddily built homes. The report does not address the current land built up by Metropolitan Land Group and how horrible these areas look. What once was beautiful farmland is now covered by what looks like Monopoly house pieces...all the same, no character, nothing denoting a neighborhood for families. Yet it's the goal to have this same company develop these new enveloped lands if the Urban Growth Boundary is expanded. Not a good solution for Oregon that is supposed to be green and an oasis of natural beauty.	8/22/2024 6:57 PM
7	There should be more plans for rezoning and growing up	8/22/2024 6:46 PM
8	All of it is inadequate! We have an abundance of property that is currently in the boundary. Use that effectively and build up and not out. You have not considered the impact to the people who live in the area regarding traffic with the addition of all the houses and business. This is the country/farmland and should be preserved as such!	8/22/2024 6:29 PM
9	There are a plethora of abandoned buildings and houses which can be renovated and utilized for future growth vs. continuing to take farmland, trees, and fields. Consider where food will come from in 20 years if there are no farmlands to sustain the animals and crops.	8/22/2024 6:28 PM
10	The 2024 UGR has implications for local government planning processes as Metro's subsequent distributed forecasts inform local Housing Capacity Analyses, Economic Opportunities Analyses, and Regional Transportation Plan modeling. The City of Hillsboro recommends Metro rely on a high population growth forecast to allow our region to be nimbler in addressing current and future housing and employment needs. The 2024 Draft UGR demand scenario 4 involves faster household growth in 2044 coming from increased in-migration of younger households, consistent with historic migration dynamics, who typically seeking multifamily and middle housing. Though younger households who migrate to the region by 2030, 2035, and 2040 may initially prefer multifamily or middle housing, many will continue to demand single-unit detached for their growing household size and other reasons. The City of Hillsboro recommends Metro add a new UGR demand scenario 5 that involves faster household growth coming from increased in-migration of younger households, consistent with historic migration dynamics, but with a larger percentage of single-unit detached to meet the demand during the next 20 years. Though the Draft UGR shows the region as having sufficient total industrial capacity, much of the industrial land supply consists of smaller parcels with an average lot size of 3.8 acres and a median lot size of 1.7 acres. The Draft UGR mentions there are only eight sites over 50 buildable acres inside the UGB that are available to the general industrial market. The final 2024 UGR should highlight the lack of sufficient large-lot industrial	8/22/2024 6:06 PM

	sites 25 plus acres in size available to the general industrial market. The final 2024 UGR should also highlight that less than 6% of the taxlots available to the general industrial market are medium-sized sites between 10 and 25 acres.	
11	No	8/22/2024 4:38 PM
12	The Executive Summary notes that “the cost of serving raw lands with needed infrastructure is a significant barrier to housing development.” Additional information should be added to the Summary and to the full report regarding the high cost of infrastructure maintenance.	8/22/2024 11:39 AM
13	That current retired property owners are getting taxed out of their homes the currently live in due to the infrastructure improvements needed when large developments go in. I understand that the developer installes the infrastructure within the development but not outside it, the sewer, water and gas lines have to be upsized downsteam/upstream from the development and the current tax payer gets to pay for that. The current tax payer also gets to pay for the additional schools and fire stations needed for these additional homes.	8/22/2024 10:11 AM
14	Per 1000 Friends of Oregon, there is currently land within the UGB that is not being developed due to lack of infrastructure. There isn't any infrastructure on the land the City of Sherwood wants to bring into the UGB either. Developers pay for roads, etc. directly in front of the housing they are building; however, they don't contribute anything to improve all of the arterial roads, Hwy 99W, etc. that become overburdened due to the thousands of people their developments add.	8/22/2024 2:52 AM
15	Protecting historic and cultural resources	8/21/2024 11:09 PM
16	The characterization of the mixed use as having unique characteristics for industrial use is way off base. To believe this seems to focus on the fact that the area is flat and undeveloped. It ignores a range of characteristics which make it unsuitable. 1. The land is sandwiched between neighborhoods to the south and west. A federal bird sanctuary lies to the immediate east. Farmland borders the area on the north. In fact the only reason it is undeveloped is it too is farmland. Finally BPA transmission lines go right through the center. If the thought that it will provide acreage for chip manufacturing, the City of Sherwood and Metro are just plain wrong. Do a little bit of research and you will find chip manufactures avoid electrical transmission lines due to the electromagnetic impact on chip fabrication. It is an ill considered scheme. It is not technically feasible for semi conductor manufacturing. In addition an industrial use would not conform with any of the current land use to the north, south, east or west.	8/21/2024 10:52 PM
17	Yes, in two areas. In "Planning amid uncertainty" in the executive summary, Metro does not include issues with the cost involved with the infrastructure and services of an expanded UGB. Cities in the metro area, and Oregon as a whole, are facing severe budget crises that all stem from over-expansion. We have built a large service area we need to provide infrastructure (roads, water, sewage) and services (police, fire, health) for, and cannot afford to. We have only gotten this far by deferring maintenance that is catching up to us. The Executive Summary also does not mention climate change once. We must pursue planning options that reduce GHG emissions. Lower-density housing leads to increased GHG emissions.	8/21/2024 10:47 PM
18	Pipe chicken Creek and add water quality facilities	8/21/2024 9:32 PM
19	there is plenty of land inside the current UGB, however much of it has locked up by garbage zoning and other rules that limits residential development's financial viability. we need to cheerlead all residential development and continue to chop down fees and rules until we get a deluge of infill development. it will make our place more financially productive, affordable and livable	8/21/2024 8:16 PM
20	I do not think the report factors in the restrictions on the land, such as existing power lines and the nature of natural wet lands. Power lines emit electromagnetic waves that greatly impact the manufacturing of microchips. Additionally, there are existing restrictions regarding industrial building on protected wetlands and their associated upland habitats.	8/21/2024 6:06 PM
21	The utlimate cost of the loss of farmland and natural areas. The proposal fails to understand the new realities and assumes more development is without this cost.	8/21/2024 5:50 PM
22	It ignores the opportunity for infill and densification of existing neighborhoods already within the UGB.	8/21/2024 4:55 PM
23	That growth has leveled off and the changing demographics of the area.	8/21/2024 4:22 PM
24	Yes, where is the money coming from for the infrastructure needed to support this proposed	8/21/2024 3:40 PM

	expansion? are builders and developers paying or are the taxpayers on the hook? In addition the discrepancy between the Growth report and the city of Sherwood projections justifying the expansion is hard to reconcile.	
25	Specifically in the Sherwood West expansion, the concept plan did not represent the will of the majority of Sherwood residents. 80% of residents did not want to see the level of expansion and were gravely concerned about how it would effect the livability and sense of community that already exists. There is no reason to add the entire amount into the UGB at this time, smaller more thoughtful expansion was never considered and the cost to add services to more of the rural portions of the reserve will be a huge burden to citizens, despite the city claiming it will not.	8/21/2024 2:58 PM
26	What's the plan to pay for the upkeep of all these new roads and sprawling infrastructure? Portland's budget is much larger than Boston's despite a smaller population in large part because we aren't as dense and suburban neighborhoods don't pay for themselves in taxes once they start to require maintenance. If we built denser on our existing roads, we might actually have the tax base to support them.	8/21/2024 2:35 PM
27	Is there consideration of preservation of trees and plants for carbon sequestration and other environmental benefits?	8/21/2024 10:54 AM
28	Land developers don't care.	8/21/2024 8:33 AM
29	Save farm land	8/21/2024 7:10 AM
30	No	8/20/2024 11:35 PM
31	Congestion is already a problem along Roy Roger's Road as it runs into Sherwood and connects to Highway 99. How will expansion and development of high density housing and business along this route between Roy Roger's, Lebeau, Elwert, and Edy roads not contribute to further traffic issues and noise? The growth projections Sherwood has provided to support this expansion are not consistent with the growth trends and true projections. As an example, the new high school was built to accommodate continued growth based on inflated projections. We now will see declining enrollment starting in just a few years. The school is struggling with budgets for the first time in years as the community is saddled with paying down the debt incurred to build a school that is proving to be too large. The housing need for the Portland Metro area is entry level to lower income affordable housing. Sherwood has become a more affluent community and is not conducive to development that will attempt to be affordable. Finally, there is no historical precedent for such a large expansion for this area. All of the above points would support reevaluation of the request to right size it for the true need for the community and support measured growth as opposed to an explosive expansion that could contribute to already tough traffic issues that impact Sherwood and the surrounding communities of Washington County.	8/20/2024 7:43 PM
32	Is property owners in Sherwood we favor the mixed use plan for Sherwood West on Kruger Road above Sherwood High School.	8/20/2024 6:24 PM
33	The amount of land proposed to be added into the urban growth boundary is staggering. Turning farmland into light industrial is sad. Sherwood still has large amounts of land available in the current boundaries. Elwert road is unsafe at its current speed limit and traffic congestion is already an issue with frequent accidents.	8/20/2024 6:21 PM
34	No	8/20/2024 6:19 PM
35	Sherwood protected land should not have zoning changes to allow for industrial growth	8/20/2024 5:00 PM
36	Traffic safety	8/20/2024 4:53 PM
37	Providing larger single family lot sizes in expansion.	8/20/2024 4:49 PM
38	The rate of growth in Sherwood area is not as substantial as the large proposal for 1291 acres, has anyone thoughtfully analyzed how long it would take to fill all the proposed housing.	8/20/2024 4:48 PM
39	Expansion for the sake of expansion. If they build it, they will come often untrue.	8/20/2024 4:25 PM
40	Sherwood area is not ready for this type of development	8/20/2024 4:20 PM
41	Quite a bit, actually. What is needed is a broader, more region-wide perspective, not mere kowtowing to Sherwood's empire building. It is not clear why Metro appears to be pushing this effort. Sherwood has ample undeveloped land within the city now, and has -0- interest in	8/20/2024 4:18 PM

	accommodating affordable housing anywhere. The northwestern portion of the proposed UGB expansion encroaches unnecessarily-almost gratuitously-upon successful agricultural operations whose success is closely linked to their rural setting. Again, it is hard to understand how or why Metro seems to have bought in on this weak, and destructive, proposal.	
42	Recognizing that the Willamette Valley is one of the richest soil areas in the world. We can increase growth inside the UGB and save our PRECIOUS farmland s	8/20/2024 4:10 PM
43	Do not expand the growth boundary in Sherwood where the high school enrollment is declining. Focus efforts on revitalizing Portland legacy neighborhoods and existing under supported schools.	8/20/2024 4:03 PM
44	There are a lot of items that we are questioning. They have been and will be submitted separately. Lot's of that data and other information is very misleading and/or obsolete and based on false assumptions.	8/20/2024 3:52 PM
45	Sherwood had enough land to build homes and businesses and industrial buildings without expanding the urban growth boundary	8/20/2024 3:52 PM
46	Expansion to the west without proper funding, study of the transportation costs including the costs of crossing fish bearing streams, condemning farm/wine property is in appropriate. Expecting the developers and existing landowners to bear the cost of development and hoping for federal funding for road improvements is narrow sighted.	8/20/2024 3:46 PM
47	The proposed plan *looks* like spraw. Even with the green spaces in the plan, there seems to be little to consideration for walkability or residential services. Also there seems to be inadequate consideration for the amount of traffic this will introduce on Elwert.	8/20/2024 3:46 PM
48	I'm concerned not enough consideration is given regarding available lands that the current owners aren't willing to sell, putting upwards pressure on land prices.	8/20/2024 3:31 PM
49	Yes, the Sherwood expansion plan is not proportional to the needs of the area and sustainability of agricultural lands. The numbers don’t add up.	8/20/2024 2:53 PM
50	The student enrollment decreasing which should be considered when planning on an unnecessary new school.	8/20/2024 10:54 AM
51	Yes, I'd like to see rail right of way reservations within the urban growth boundary area expansion. An exclusive ROW reservation is easier to set aside before development.	8/19/2024 6:09 PM
52	Use the land that is already inside the UGB first. No more tax increased and increased traffic please.	8/19/2024 12:45 PM
53	It’s incredibly disappointing that the report makes zero mention of the impact of the Urban Growth Boundary to will totally undermine any efforts to address climate change. Metro continues to ignore the science, and push for expanding car infrastructure and sprawl. We are poisoning the planet, and this action will massively increase GHG emissions.	8/18/2024 8:37 PM
54	There needs to be greater emphasis on increasing density and building up, not out	8/18/2024 8:30 PM
55	Traffic, it’s horrible and adding more houses is not keeping the town of Sherwood a great place to live	8/18/2024 7:01 PM
56	The report makes no mention of why the city of Sherwood needs to expand outward further from "Downtown Sherwood" and across 99W rather than upzoning and developing further around central services of community like libraries and grocery stores.	8/18/2024 5:10 PM
57	Sherwood has a ban on new apartment development in most of the city. Allowing an expansion of the growth boundary to this level when we are in a housing deficit will do nothing to alleviate the problems. Start with allowing these developments before agreeing to expand the growth boundary	8/18/2024 3:42 PM
58	Do not go forward with Sherwood West plans!	8/18/2024 3:25 PM
59	Greater enforcement of the UGB, do not allow Sherwood to violate it.	8/18/2024 2:25 PM
60	Sherwood Oregon has a near city wide ban on apartments. They should not be granted a UGB expansion before they show true need. Build some apartments Sherwood first!	8/18/2024 2:25 PM
61	No one wants to ask the hard questions about where the water will come from to support all this new development. We need to encourage businesses to choose small towns that have	8/18/2024 1:21 PM

	lost their timber jobs. Stop over-crowding the metro area.	
62	The complete wreckage of the farmlands, farm stands, community farm activities, scenery, peace, quiet, and character of the rural SHERWOOD community if the UGB were expanded in this way. Stop trying to make Portland better by absorbing everything around it to be ruined like Portland has been.	8/18/2024 1:20 PM
63	The fact that we do not use the existing UGB wisely.	8/18/2024 1:11 PM
64	Sherwood has an apartment ban yet wants to expand their growth boundary. This is counteractive to our housing and density goals in the Portland metro area. I ask that the council deny their UGB expansion in favor of more density within the current Sherwood city limits.	8/18/2024 12:49 PM
65	How are you going to ensure affordable housing goes to younger people without it being considered discrimination? Are you going to limit it to only Oregonians allowed to buy it?	8/18/2024 12:29 PM
66	Cities in Washington County maintain apartment bans across the overwhelming majority of residential land. Instead of lifting that ban, and finally allowing for adequate housing production, they insist that we must sprawl into more natural and agricultural land. Metro must ensure that there is a 20 year buildable lands inventory, and instead of fulfilling that through granting yet another irresponsible expansion of the UGB, it must exercise it's immense authority and compell cities to legalize more housing in existing residential areas closer to good transportation, job centers and amenities. Metro must also use its weight to compell cities to cut red tape that present a barrier to housing production, speed up permits, reduce discretionary processes, reduce permit fees and SDC charges.	8/18/2024 11:49 AM
67	This report inadequately considers the fire risk, climate impacts, and regional transportation connections for this plot of land. The notion that Metro is considering allowing more southern-California style sprawl in area with very poor automotive and transit connections in 2024 is deeply frustrating. As the last several weeks of media reporting have revealed nationally, this type of development will not be insurable in the coming years. Metro needs to think forward and better realize the context in which it is making this decisions. Developers want more land: not Oregonians.	8/18/2024 11:27 AM
68	Yes, better roads to handle the traffic.	8/18/2024 9:40 AM
69	What the decision makers already know and must reconsider, dense housing is not good for young families! There’s no place for kids to have a yard and play or have a garden. These homes are an eyesore to the landscape. It’s all about money and not the people. These home are NOT AFFORDABLE.	8/18/2024 7:48 AM
70	The area of Sherwood West is great farmland and wineries that make our city unique. While some development around the high school may be necessary, the Sherwood West concept asks for more expansion than is needed to support our community.	8/18/2024 6:28 AM
71	I think whoever has been making decisions for Sherwood has been doing a horrible job. I’d like to see more independent and family run businesses, not more hotel chains, restaurant chains, etc. I don’t think rapid growth is the right way to approach the future. Sherwood should be investing in what we currently have available in town, people who are interested in starting businesses. Preparing for challenges of the future should be the focus. Not continuing to expand. That will not solve anything, it will just make the problems we already have worse.	8/18/2024 1:08 AM
72	Don't build more homes, save our farms, and improve on what we have already	8/17/2024 8:46 PM
73	I don't see strong consideration of the potential downsides of each plan. If housing is underbuilt (because the area grows more than expected), the consequences are very bad - house prices rise again, families are priced out, people lose their housing, etc. But if we build more housing than necessary, the consequences are not so bad - we are just future proofed and ahead of schedule, dropping housing prices even more.	8/17/2024 2:48 PM
74	There are many types of housing and according to our governor, we need to address them all. When I move to Sherwood 20 years ago, I had three children and was able to find a house that has worked for us . If all that was available were apartments, or high density housing, we would not have moved to Sherwood. We need to have houses that young families can afford, perhaps creating a land trust like in Medford. I understand some that some people want to stop all development, but I believe that that will cause our beautiful schools to be empty and result in us needing to accept students from a larger area. This will have a detrimental effect on not	8/17/2024 9:10 AM

	only our community, but we would most likely attract the best and brightest that could afford to be driven to Sherwood everyday. This would diminish schools in the surrounding areas. We also typically lose people who no longer have children in the schools. We need a place for them to have affordable housing that is smaller so that they do not need to leave their social circles.	
75	The importance of preserving natural areas	8/17/2024 8:27 AM
76	I think that small outlying areas like Sherwood need to remain small. We moved here to a smaller city because we didn't want traffic and houses and excessive growth.	8/17/2024 8:02 AM
77	Climate change and public transit/alternative transit should be of utmost importance.	8/17/2024 5:18 AM
78	Zoning needs to stay where its at	8/16/2024 11:03 PM
79	How valid are your growth models? Internal and external growth appeared stalled.	8/16/2024 9:31 PM
80	I do not think that the impact of adding space as per the Sherwood plan addresses the congestion problems that will worsen or the impact on quality of life in the area.	8/16/2024 4:23 PM
81	Adding urban growth in areas lacking efficient transportation options only creates more expensive local long term costs and declining quality of life	8/16/2024 4:23 PM
82	Population in the Portland area is going down and continued to go down. We do not need to expand so much.	8/16/2024 11:44 AM
83	current roads are not capable of supporting new housing neighborhoods	8/16/2024 7:35 AM
84	Provision of shovel-ready, buildable land for housing and jobs for the next 20 years.	8/15/2024 1:41 PM
85	Growth in the Sherwood direction seems haphazard	8/14/2024 1:08 PM
86	Landowner rights near urban growth areas	8/14/2024 7:01 AM
87	There is a lot of unoccupied space in downtown Portland and surrounding areas. The economy is not in a good position now, no one can afford to purchase a house or pay the high price of rent.	8/14/2024 5:31 AM
88	No. I 100% oppose the expansion of the urban growth boundary	8/13/2024 10:06 PM
89	It says one of the goals is to protect farmland but yet everywhere I look I see more and more land being turned into industrial buildings and houses. So many farms have been lost and it is disappointing to see.	8/13/2024 7:54 PM
90	i am opposed to the Sherwood West Concept Plan, as there is not infrastructure in place to support growth of that size at this time.	8/13/2024 4:45 PM
91	I do not think the Sherwood population is growing as rapidly as stated there is enough housing to sustain growth	8/13/2024 4:06 PM
92	Stay out of Wilsonville	8/13/2024 1:58 PM
93	More transparency of Metro projects. We have a few near us and it’s difficult to get straight answers.	8/13/2024 12:55 PM
94	People need to know what the cost (not the money) is to our community when we just keep building and building and building and taking away land from people that don't want to give it. You have wildlife with nowhere to go but in the neighborhoods then people get upset they are in the neighborhoods you wonder why food is so expensive and unhealthy and it's because with every new community you have less area for farms which means our food comes from further and further away and you have no idea how it gets there or who grows it. Building more shouldn't be the only option.	8/12/2024 6:13 PM
95	Urban densities are reaching unsustainable levels. We have vast room to expand UGB's and we shod do so. Make a plan to double the amount of land available for residential development over the next 20 years. Stop trying to cram ppl in tight places. Fix it now before all the counties decide to annex into Idaho.	8/12/2024 5:29 PM
96	Funding and impact of non taxpayers on quality of life	8/12/2024 4:44 PM
97	Yes, not adequately thought out.	8/12/2024 10:01 AM

98	If Portland area can't enforce the crime there is now why grow?!? ! How about we clean up what is the problem now: homeless, drugs, etc Then when that's taken care up perhaps talk about growth. But why talk about growth when crime is through the roof with what's there now?!?!	8/12/2024 7:23 AM
99	Citizens of Sherwood are not opposed to growth. We are opposed to frivolous spending on endless, poorly planned suburbs that are not supported by current growth patterns and predictions	8/11/2024 8:32 PM
100	PRESERVE GREEN SPACES.	8/11/2024 8:15 PM
101	I need more park with big trees, MORE BIKE LANES, less cars, there is nothing of that	8/11/2024 2:32 PM
102	Traffic congestion already exists on Sunset due to new high school and turn restrictions onto 99 from Brookman/chapman. The neighborhoods back there are not all built out so we haven't seen the true impact of that traffic. It is already very difficult with the existing population adding more houses and more cars is not going to help.	8/11/2024 10:27 AM
103	The most basic of economic theory is supply and demand: restrict supply and the inherent demand will cause price increases. If affordability is a key driver then ensuring adequate supply of land is fundamental to affordable housing.	8/11/2024 8:18 AM
104	We need more land made available for single family housing and just not for apartments.	8/10/2024 11:46 AM
105	Impact on agricultural, wildlife and wetlands.	8/10/2024 10:36 AM
106	Family size is declining. Discourage large house development by charging higher fees and taxes for houses greater than 2300 sq feet.	8/10/2024 9:58 AM
107	Don't steamroll new development...require government agencies to actually and actively listen to citizens. So often over the years I've seen city councils hold meetings for public to share thoughts, but it is very obvious that a plan has already been decided on and nothing residents say is taken into consideration. Most recent example is in King City where a residential street will soon be turned into a major, multi-lane road, destroying the neighborhood with too much traffic and making it a major thoroughfare.	8/10/2024 7:37 AM
108	Many people want to own their residence or live somewhere single-family. Statistics show that kids have higher achievement if they live in a regular home as compared to an apartment. That said, the low number of single-facility homes planned doesn't line up with the priorities/preferences of residents, nor what is best for the next generation.	8/9/2024 11:15 PM
109	Have you population projections taken into account that so many people are moving out of Oregon?	8/9/2024 5:50 PM
110	As updated projections for growth shows a downward trend particularly with the enrollment of the relatively new Sherwood High School at cost of aproximately $248 million financed by taxpayers. The proposed Sherwood UGB plan if approved will again significantly impact taxpayers as well as displace current residents. Smart, prudent and realistic planning for growth is much needed. Otherwise, grabbing large parcels of land with current and productive uses in one fell swoop will have dire immediate consequences as well as unintended consequences in the future.	8/9/2024 11:13 AM
111	Impacts to natural greenspaces, waterway management.	8/9/2024 9:51 AM
112	It is painful to see "decision makers" who see vast developments as necessary instead of using the less desirable land that is available or at least not develop in patches that can be sub divided. Reserving the nature we have is important. As a native Oregonian we do not want Califonication…Mass sprawls of urbanized land. Gentrifying of old neighborhoods should happen before expanding.	8/9/2024 9:32 AM
113	Do not expand the proposed Sherwood area plan, too much traffic causes people to take country roads not built for this high volume traffic. It is causing dangerous situations with high speeds and too much volume on roads not built for this much traffic.	8/9/2024 6:58 AM
114	No	8/8/2024 9:04 PM
115	Oregon is changing many say. Lower population =charm. Higher population =more crime	8/8/2024 8:18 PM
116	Think about cleaning up what you have and not creating more that you can't take care of	8/8/2024 7:45 PM

117	Impacts of Climate change	8/8/2024 7:45 PM
118	The necessity of preserving farmland	8/8/2024 7:05 PM
119	Stop the sprawl	8/8/2024 6:28 PM
120	Keep land as is no more commercial growth	8/8/2024 6:24 PM
121	You are pushing out small family farms by expanding the urban growth boundary.	8/8/2024 1:58 PM
122	I think Sherwood's specific analysis at the local level should be part of the Metro Council decision making. There's a strong argument to be made about where people want to live and work that doesn't always translate to regional land availability.	8/8/2024 1:04 PM
123	no	8/8/2024 12:02 PM
124	I am very against the tall high rise forms of living. The people that buy them are childless. Single family homes need to be focused on. As large companies come this way, Sherwood, the employees come for the schools, and they have kids. Our schools are emptying because there are no children coming up the ranks. It is very sad and the schools get paid per child enrolled. We build all of this for the now, but not for the duration.	8/8/2024 11:42 AM
125	The report seems wise and carefully written to me.	8/8/2024 11:25 AM
126	If the population is slowing or declining why should the boundaries be expanded? Sherwood does not have the infrastructure for expansion. The roads are overcrowded now.	8/8/2024 11:04 AM
127	Traffic and dense housing increases school crowding	8/8/2024 10:47 AM
128	How about we grow in the surrounding communities outside of portland? Office space downtown is empty, people are fleeing the city yet we want to rip and build on fatmland	8/8/2024 9:54 AM
129	I think we need more responsible growth. We keep building more while there are buildings sitting empty for years. Sherwood theater has been empty the old Hagens building in Tualatin also has been empty for several years as well as my others. Maybe before expanding one should consider repurposing existing buildings.	8/8/2024 9:42 AM
130	I can see wanting to expand the boundary to the north or SE. Tigard, Tualatin or Wilsonville will want to grab that space. There doesn’t seem to be a push from the west or Sw for that space. Need to not spread to far too fast. IMO	8/8/2024 9:37 AM
131	Not considering what is best for us in Sherwood. We like small community living. Stay away !!!	8/8/2024 8:49 AM
132	I think there are other places, for example West Lynn or Wilsonville that already have the beginnings to your urban sprawl. There are just too many roads that are congested and it’s becoming Los Angeles quite frankly disgusting. Please leave some of the cities in Sherwood Canby etc., so that we can have rural areas and people that want the countryside feel. Leave them alone.	8/8/2024 7:14 AM
133	it seems clear that the statistics regarding growth (population and growth) indicate that expansion of UGB is not needed at this time. The Sherwood West proposal is the product of a few influential politicians and developers, and is not the desire of Sherwood general population.	8/7/2024 8:21 PM
134	Does not consider the exodus of people from Portland to Washington due to higher and higher taxes; recent layoff statistics and declining population does not justify the need for expansion of the UGB; no indication of jobs to be created by each business when AI and automation are replacing workerrs	8/7/2024 7:57 PM
135	we don't need UGB expansions, there are so many places for redevelopment, and developers are making way too much money, create a local lending program for building affordable housing, and for wealth building for communities of color	8/7/2024 4:34 PM
136	It looks like a good plan.	8/3/2024 8:26 PM
137	Historical aspects, the heritage of native people, the preservation of land that may contain artifacts, minerals or be of historical importance. Or, significant & with a legacy of those who came before us. The rights of farmers, especially, families who have been tending to land (much of it which could be considered some of the best in the nation for agriculture) & animals for generations. Also, the Native Americans heritage & culture as many areas in Oregon have artifacts (that can easily be missed, discarded or ignored), historical & cultural symbolism & importance.	8/3/2024 12:50 PM

138	OR 99W and Sunset Blvd intersection needs a traffic study before the UGB is expanded, not after.	8/2/2024 11:42 PM
139	There are lengthy discussions about housing and industrial building, but no mention of commercial amenities close to housing. It would be nice to have restaurants that are not in strip malls and are more integrated into each neighborhood (like old Portland, with small stores, eateries, service stations among the neighborhoods). Feels less like SPRAWL.	8/2/2024 3:13 PM
140	The land that is left for residential development isn't always workable for builders. Sometimes the land, although surrounded by neighborhoods, cant gain utilities. Or the transportation plan doesn't match the development needs of the city. I'd like to see more opportunities in Tigard, Beaverton, Bethany, and Hillsboro.	8/1/2024 12:31 PM
141	No	7/31/2024 8:37 AM
142	Decide on buildable land areas based on _middle housing_ options, not single-family zoning!	7/30/2024 7:44 PM
143	Unfunded past needs.	7/30/2024 8:55 AM
144	the public is appalled at the appearance of high density neighborhoods. people are leaving Portland becasue if the fixation on density and the lack of senior living options. The public seeks more diversity in housing choices and more complete neighborhoods.	7/30/2024 7:14 AM
145	The urban growth boundary is one of Oregon's most valuable assets. Preserving this boundary in spirit and in substance is critical to this state being the place people choose to live.	7/29/2024 11:48 AM
146	not at this time.	7/29/2024 9:35 AM
147	The consideration of houses not being available or owned by residents. It doesn't do any good for the community if corporations or individuals are purchasing homes to use as rentals or other money making ventures.	7/29/2024 7:48 AM
148	no need to expand ugb, make esisting city more dense	7/28/2024 12:50 PM
149	Climate change, both how to mitigate it in the urban area as we grow, and how to reduce everyone's carbon footprint through planning.	7/28/2024 8:34 AM
150	Yes. There's a housing crisis. Homes are unaffordable. Supply is not matching demand. We should strive to have the same housing affordability as Michigan, not just accept that the west coast is expensive. We made it this way. We need to adopt the if we built it someone will live in it and build until the affordability crisis is abated. This report does not address the immediate needs nor total volume of new housing supply with the urgency the problem deserves from an organization that has the power to make a difference.	7/25/2024 7:17 PM
151	It looks pretty good	7/24/2024 5:33 PM
152	Yes. I have several concerns and oppose approval of the proposal: 1. The City of Sherwood failed to plan for traffic infrastructure related to the proposed growth, making the plan unfeasible. 2. The proposed industrial zone has large swaths of area that are designated at Title 13 upland habitat. The plan does not address this major barrier and operates on an assumption that the designation can be removed or does not apply. 3. The proposed industrial zone has a 500KV transmission line running diagonally through a central segment contemplated for large-scale development. Use within the easement is extremely limited (parking lots, containment ponds and the like), making the area not suitable for industrial development. 4. The area is not suitable for chip and other similar types of manufacturing due to EMI (electromagnetic interference) from the transmission line. 5. The proposed industrial site is in the gateway to wine country from Hillsboro and Beaverton, threatening the agricultural use that is a major benefit to Oregon's economy. 6. The proposed industrial zone is in close proximity to the Tualatin National Wildlife refuge, raising additional concerns about environmental pollutants in this ecologically sensitive region.	7/24/2024 3:55 PM
153	I agree with Dr. Gerard Mildner, Professor Emeritus of the PSU School of Business who makes these important points: 1) Metro should reject the staff's Draft 2024 Urban Growth Report. High housing costs are real. Working at home (now 24% of workers) requires larger housing units, not smaller ones. The existing UGB includes a lot of hard-to-develop parcels, as well as private zoning that prevents middle housing. 2) In the draft, staff argues that "fertility rates in Oregon are below replacement, so high population growth only comes from attracting younger workers. Younger workers choose multi-family locations. And more multi-family apartments	7/24/2024 11:56 AM

	means less acreage needed within the UGB. Hence, no need to expand the urban growth boundary..." There are two problems. First, multi-family housing is more expensive on a per square foot basis: Two-story apartments are the lowest cost form of apartments. Five-story construction like we see in Beaverton and East Portland require rents about 50% higher to justify construction and dominate when land costs are higher. True high-story using steel and concrete (or massed timber) requires a further 50% premium in rents, and dominate in downtown Portland. Hence, Metro is exposing us to further increases in housing costs. However, housing prices are never discussed in the Draft Urban Growth Report. Staff applies their engineering metrics of people per hectare, and ignores economics. Second, people age and have families. While it's possible to recruit college graduates to move to the region, the individuals seek larger housing units as they age. The 22-year old who arrived in 2024 will be a 42-year old at the end of the planning period. And as we discovered during the pandemic, single-family homes offer great opportunities for home offices, bedrooms for relatives, and backyards for children. We need to factor in that people grow up.	
154	I can see making a special exception for UGB in the case of Intel or another massive commercial project that's going to inject billions of dollars into our local economy. But that's the only exception. Suburban sprawl is a proven GDP killer. I have found the website Strong Towns to be immensely helpful in explaining to people why suburban sprawl is actually bad for economic development in the long run	7/24/2024 7:32 AM
155	It seems Sherwood will need more housing and mixed use high-end shopping areas for its residence. Already housing prices are high because there is a shortage in the area.	7/23/2024 9:20 PM
156	Denser Development	7/23/2024 8:54 PM
157	This report shows we have a shortage in housing and employment land and we need to continue to grow in a way that enables quality of neighborhoods, affordability and attract businesses. We need to continue to grow to be healthy.	7/23/2024 8:30 PM
158	The low value of subjective assessments of the types of growth that will occur in the future. Footnote 3 on Page 38 relies on jurisdictions own estimates of what kind of demand for housing there will be in the future, despite the noted clear market incentives to the contrary. Middle housing has only really been available for a few years, and that period has been heavily punctuated by the pandemic. The real impact of those changes will take decades to see, and subjective information about past growth patterns have little value in the face of the newly unleashed market demand that will, under all other scenarios, drive new growth. This is especially important to consider when every other scenario for growth supports Metro's policy goals. Finally, I find it very strange that only a single small city in the region has interest in expansion. Either that city is misinformed about actual demand (a "hospitality zone" in Sherwood, really?) or every other jurisdiction in the region has completely missed the boat. I think I know which is more likely. I suggest that the Metro Council take into consideration the dearth of expansion options being presented as further evidence that the demand for growth actually isn't there.	7/23/2024 6:39 PM
159	The estimates assume many things, but do not factor in new work from home models, AI impacts on work models, or any other forward looking assumptions.	7/23/2024 6:19 PM
160	By enlarging growth boundary you are taking away areas which are now rural and small woodlot areas enjoyed by middle class and lower class families and replacing them with small apt, house lots. The gap between the wealthy obama like estates and what you want to do will increase. And which group do you belong to?	7/23/2024 3:19 PM
161	I agree that the boundary should not be expanded and we should work to improve the existing land	7/23/2024 3:14 PM
162	Taking into consideration the land and low traffic needed in agriculture areas where you have animals, large machinery, etc which is impacted by bringing in commuter roads.	7/23/2024 2:12 PM
163	Severe traffic problems with overburdened road systems in Sherwood Oregon and SOLUTIONS before even considering growth outside the current urban growth boundary. No need for industrial growth outside of current growth boundary - extensive options along Tualatin Sherwood Road. Adequate development land within the current Sherwood boundary.	7/23/2024 12:06 PM
164	The need for farmland is critical. Other than a gratuitous statement of its value, the Report does not address the consequences of replacing fertile, productive land with houses and industry. Build those structures on poor soil, where farming is not tenable. This should be addresses in the Report.	7/23/2024 11:17 AM

165	A UGB expansion in a part of the metro area poorly served by transit and likely to be entirely car dependent does not align with any of our regions goals. As such, it's unclear why it's being considered	7/23/2024 2:36 AM
166	I think the zoning is way too aggressive, I think we need to honor what Tom McCall wanted for Oregon. I don't believe creating more homes is going to create housing that is more affordable. Supplies are too expensive and resources are limited. I think if we randomly infill without thinking ahead, then we're just going to be damaging Oregon as a state. I think we need to address infrastructure rather than just letting infrastructure motivate us to improve it based on building more homes. No toll without a vote. Let's stop copying municipal code in California and let's get with with the program on why people are moving out of California. Environmental first!!	7/22/2024 3:06 PM
167	Building designs with the change in climate in mind.	7/21/2024 10:35 AM
168	The area is losing residents. There's no reason to extend the growth boundary.	7/21/2024 9:00 AM
169	Looks good to me, just want more density	7/20/2024 9:12 PM
170	Do not expand the urban growth boundaries anymore. We have enough land within their current extent to build densely. This will preserve open spaces and discourage car usage which is bad for the environment; it will also encourage transit usage which is the way of the future.	7/20/2024 7:38 PM
171	No	7/20/2024 7:41 AM
172	Inclusive community engagement; conducting an equity assessment on the concept plan	7/19/2024 4:15 PM
173	Not enough work was done to analyze changes in policy that encourage veritcal growth and density in the existing lands. The report focused on unused/available lands, which is not the only way to change policy and discourage sprawl through UGB expansion.	7/19/2024 2:06 PM
174	First, if manufacturing jobs represent only 10% of total non-farm jobs in the region, why so much emphasis on it instead of prioritizing other sectors? Second, is there any study of the effects UGB growth causes on air and water quality? Pollution is a crucial factor to consider.	7/18/2024 12:03 PM
175	Residential RV parks and mobile home parks can be a very useful tool for lower income housing, but they are prevented in many communities and not mentioned in the reports	7/18/2024 6:16 AM
176	There is too little consideration for watershed restoration in suburban areas. At this stage in development it would still be easy for us to reclaim riparian areas and sections of streams with free flowing water and designate them for public use. If we wait twenty years more of that land may be covered with pavement or sterilized of natural habitat.	7/17/2024 11:12 PM
177	TRAFFIC 🛑	7/17/2024 6:04 PM
178	The report claims that more land is needed for "welcoming families". Aside from the city of Sherwood targeting employers not residential development, the claim that there isn't enough land for either is absolutely false. Look at the development adjacent to the Tualatin-Sherwood highway. It's all auto-centric, low-rise sprawl surrounding a wide highway that only induces more driving. Even the high school is auto-dependent. If Sherwood (and the rest of Oregon and the US) developed in a similar pattern as before the car dependent suburban experiment, there would be plenty of land available for new businesses and families. Instead of looking to reverse the mistakes of the past 5 decades, Sherwood is just trying to continue the auto-dependent development. The city is claiming that they need space for all type of housing and that land scarcity is driving up costs. That's baloney. The suburban development is what's made land scarce because of inefficient use. And an efficient use of land will make land available for housing. Just not the typical suburban single family detached housing. And while the state mandates sidewalks and bike lanes, it doesn't mean that they'll be used when the destinations are far apart and the environment is hostile to the development. Finally how does all this need take into consideration the development going on in King City, Hillsboro, etc.? If you're only looking at Sherwood in a vacuum, then you are missing the cumulative impacts of development as well as trying to steal jobs from surrounding communities.	7/17/2024 2:18 PM
179	The will of the people who live here.	7/17/2024 2:00 PM
180	This expansion creates too much low density housing. If the proposal is serious about creating more housing and jobs it should only include space for multifamily housing that can be mixed with commercial spaces. We need more NW 23rds not more Lake Oswegos.	7/17/2024 9:20 AM

181	No. Please approve it	7/16/2024 11:18 PM
182	For Sherwood to maintain its quant quiet small country town feel it cannot continue to sprawl out into the countryside that makes Sherwood what it is. There is enough space currently in the city that should be reimagined and redesigned to support more homes and people	7/16/2024 8:46 PM
183	The report did not consider the potential impacts of climate change, in terms of population increases in the Northwest due to cooler weather and water availability relative to other parts of the country, and also impacts of climate change on the wildland urban interface and how this could impact fire risk for the edges of the Portland area.	7/16/2024 8:26 PM
184	Plan more roads. Stop allowing destruction of natural area and trees and require trees be preserved as well as more planted instead of grass.	7/16/2024 6:26 PM
185	I think a more in-depth analysis of how mixed use and/or dense an area needs to be in order to, at the very least, financially break even (taxes collected minus cost of local services provided), would be highly beneficial, especially if it can be put in a visual format which is much easier to understand. Urban3 (which worked with the City of Eugene) does this kind of work, and I feel Metro may gather very valuable information from this type of analysis, even for specific areas within the UGB. Financial viability should be at the core with Metro's development decisions so ensuring this single element is achieved and can be demonstrated to the public with figures and images seems an essential element to consider.	7/16/2024 5:52 PM
186	I think the decision makers have already made up their minds on what they plan to do and it many times is not in the best interests of the communities	7/16/2024 12:20 PM
187	No.	7/16/2024 10:24 AM
188	The employment and population forecasts are unduly pessimistic. This area has done better than national trends consistently over the last few decades, and the forecasts appear to anticipate decades of decline.	7/16/2024 9:04 AM
189	Funding for schools! You cannot expand boundaries and overfill our schools without discussing how these (and other entities) will see a compensatory increase in funding.	7/16/2024 8:09 AM
190	There needs to be more land opened for more housing. We need to restrict Airbnbs as almost a quarter of homes are being bought by investors and rented out increasing the cost to rent and to buy. If we limit airbnb or charge a fee for doing Airbnb we can create revenue to allow for more subsidies on housing. But the biggest need is a larger amount of buildable land so people can actually afford homes and lower price.	7/16/2024 8:00 AM
191	Metro needs to read between the lines of the Expert's analysis. Even the small baseline growth assumption seems optimistic. Developing suburban land will not create "affordable housing" in locations where it is needed.	7/15/2024 8:39 PM
192	Why do we need to create conditions to attract people to settle here? It's okay to not do that. They will go elsewhere and that is okay. We have always been fine. We already have too much congestion and need breathing room.	7/15/2024 7:50 PM
193	I think crowd control. If you are going to purchase a house, chances are you want a yard, places to safely park (or where guests can safely park), and really resources and road/traffic control. The bigger Portland gets, the more cars on the road…maybe it's time to consider different highways that avoid clustering the hwys that already exist. Wildlife also needs much more considerations. We have a lot of animals that migrate through the season and even during the day, they need safe areas to complete this. Tigard has amazing walkways through the city which follow a stream and tons of wildlife use it for traveling away from cars as well as a food, shade/shelter, and water source. It's surrounded mostly by roads with low speed limits which is helpful too.	7/15/2024 7:17 PM
194	Quit taking out property	7/15/2024 6:47 PM
195	More focus on providing good housing for all demographics and not creating slums. More focus on transportation as well as drivability. More focus on public safety, education, sustainability,	7/15/2024 5:54 PM
196	Maintaining an affordable supply of single family and mid density housing	7/15/2024 5:28 PM
197	Too many people in the boundary lines causes insane traffic for people living near the highways. I can't even get out of my neighborhood to turn on to a road because there is so much traffic	7/15/2024 5:12 PM

198	The proposed size of the UGB in Sherwood seems extraordinarily oversized, with lands that are currently used for employment in forests, farmlands and wineries being usurped by potential new employment that is uncertain. Damage to watershed and forest lands are not be duly scrutinized.	7/15/2024 3:31 PM
199	Thank you for the survey. Please remember to hear both sides of the coin in all of these affairs.	7/15/2024 3:25 PM
200	When economic development staff in the region are working to attract employers, they need quick decisions. We never have enough options. I think the semiconductor task force and the state's decision to allow an expansion if the opportunities present a quick decision. More 'optional' land could be a good policy when all the right conditions are met.	7/15/2024 2:14 PM
201	I think you are gonna see tons of commercial land come up for sale and flud the market with people working from home. Maybe a plan to convert through building or land inside the urban growth boundary to housing. That will help. And cut all the red tape to build on the land we have now. No one can developed land if it cost 125k just to see if anything can be built.	7/15/2024 1:45 PM
202	Farm land and wild spaces, especially in sherwood. It would be preferable to establish larger housing withing existing city limits vs expanding into the broader area	7/15/2024 1:41 PM
203	Build the infrastructure/roads/ammenities before allowing more residential	7/15/2024 1:35 PM
204	It's good. Let's fund it.	7/15/2024 1:17 PM
205	See above. Expanding the UGB for the sake of more single-family residential development is merely blessing sprawl. Thank you.	7/15/2024 1:12 PM
206	Underproduction on recently added lands to the UGB suggests that proponents for expansion are not honest in their assertions. Also, recent proposals for expansion of nearby UGBs, as in North Plains, utilize regional rather than local growth to make their need case. This suggests, at a minimum, that nearby cities should be added to the Metro UGB should they seek to expand their UGBs.	7/15/2024 12:58 PM
207	The cost of living is only mentioned twice in the draft report. Perhaps addressing this would help with uncertain emigration numbers.	7/15/2024 12:40 PM
208	No	7/15/2024 10:53 AM
209	Fewer parking lots, less sprawl, more dense housing, narrow freeways and add tolls, more bike paths	7/15/2024 10:35 AM
210	While you give lip service to climate change, not enough is being done.	7/15/2024 9:56 AM
211	See above. Do not open the UGB to large plots of ‘farms’ that get reduced taxes for having a llama ir Christmas trees. We all know that is a sham to allow rich people estates.	7/15/2024 7:25 AM
212	No	7/15/2024 6:07 AM
213	I am older woman, age 74 and do not think you are taking into account people like me who living long. Keep public transportation strong so I can go Places. I work part-time and still drive a car but not for long so please don't disregard the needs of older people like me.	7/14/2024 5:37 PM
214	The mobility corridor connecting Portland, Tualatin, Sherwood, Newberg, Dundee, McMinnville, Sheridan, and Lincoln City needs a major upgrade, especially with the growth planned for Sherwood West, and continued growth in Yamhill County.	7/14/2024 3:55 PM
215	Community wants. Oregon talks a big game but consistently underestimates what is needed. See the lack of lanes on 217 while light rail was promoted, people do not want mass transit but tax dollars are wasted instead of put where the community wants. Soulless development of cookie cutter houses replace rural and natural areas. Oregon is supposed to be about conservation, not how many tax revenue lots can be jammed into the urban growth boundary.	7/14/2024 3:35 PM
216	Please stay away from Sherwood'as green space, wetlands and agricultural land.	7/14/2024 3:25 PM
217	The Sherwood West proposal as it pertains to Lebeau and the nearby Edy road area. There is no need for additional industrial growth in these areas. We live in the area and are members of local wineries there, all of our neighbors are against the unnecessary growth in this area. I am concerned for the environmental impact that growth in this area would cause and for the loss of the natural beauty that drew us to Sherwood. Tualatin-Sherwood road holds plenty of space for	7/14/2024 2:16 PM

	industrial growth and it is not needed on the Lebeau/Edy side of Sherwood. Please consider the residents and the environmental beauty of these areas before approving this project as it will bring a negative impact on the community.	
218	Most important the limited water supply of Chehlam Mt. has been taken into consideration at all, particulary based on the models of the past yrs of shifted temperatures and climate. People move in , parks r created and water wasted to.kerp them all green. Chehlsm Mt. does not have an aqua fir and must rely on rain which has been heavily impacted. 2. The infrastructure and traffic patterns were not considered at all for the area. Development is allowed to come first and no infrastructure, then yrs if worthless construction and traffic jams. 3. Sherwood City council only wants the profits.	7/14/2024 1:53 PM
219	No	7/14/2024 12:44 PM
220	No	7/14/2024 11:19 AM
221	There are so many new buildings and warehouses and apartments and such in Sherwood we don't need to take up any more farmland. And we really don't need that much more congestion on that side of Sherwood.	7/14/2024 11:16 AM
222	Traffic, funding for all the growth expansion. Sherwood residents already paid for a gigantic high school that is only a 1/3 of total capacity. Sherwood residents do not want to fund more unwanted and UNNEEDED expansion into our green space and precious ag land.	7/14/2024 10:28 AM
223	Not enough infrastructure or community input	7/14/2024 10:25 AM
224	Citizen comment	7/14/2024 10:13 AM
225	The North District is currently farm land and at the base of a hill that is all agriculture. We do not ag land this developed into manufacturing and commercial space, adding more traffic to an already bottlenecked Roy Rogers road. Sherwood already expanded to develop more commercial space. This land has not been fully developed, yet the city is already asking for more. tualatin, King City, and Beaverton, All bordering cities of Sherwood, I've had massive growth or art currently in the growth process. The city of Sherwood demonstrates a lack of need. Metro must consider want verse need in this scenario. This ask would expand the city of Sherwood by 41%, an obscene amount of unnecessary growth into utilized farm and agriculture land. The land that the city is requesting, backs up to a national nature preserve, a precious creek and wetlands, and farm land that is all currently farmed. This land ask is unneeded and unwelcome but the majority of Sherwood residents. This has been demonstrated by a survey of Sherwood residents. Over 80% of residents rejected the city's proposal plan.	7/14/2024 10:03 AM
226	I think the decision-makers need to put more emphasis on how we are traveling around the city and look to boost trimet influence on the city. More bus lanes and build the southwest line.	7/14/2024 9:25 AM
227	Need to better factor in seniors	7/14/2024 12:07 AM
228	The house size was not considered. It would be wise to focus on density increase and apartments building woth mentioned family size decrease.	7/12/2024 11:40 PM
229	I appreciate the focus towards climate change and there was more focus on car free infrastructure than I was expecting. But one thing I think needs improvement is a stronger focus of prioritizing more dense housing and their proximity to green spaces. It seemed like when looking through the proposals, the low density SFH areas were closer to the nicer park areas. I also think this area needs to prioritize state of the art bike and walking infrastructure. The trails mentioned sounded good, and it would be great if they were totally separated from car right-of-ways. I would prefer all of this to not happen at all, but if it did, I want to see it done right with good urbanism design features and reducing reliance on cars.	7/12/2024 8:13 PM
230	no	7/12/2024 7:47 PM
231	Vertical development is a direction - we can build up, build density, and single family car oriented development is not necessary at this point. There is a lot of density to build and zoning + investments can make it happen.	7/12/2024 6:10 PM
232	more thought needs to go into transit access	7/12/2024 5:31 PM
233	We need housing and commercial offerings where schools and business In order to contain traffic - housing and commercial offerings must surround schools and places of events.	7/12/2024 1:10 PM

	Washington County is not well organized, there is a lot of driving to get from one place to another.	
234	Equity and access to opportunity and how severe restrictions on the urban growth impact communities of color and other disadvantaged populations.	7/12/2024 12:23 PM
235	Suburbs destroy ecosystems, increase emissions, decrease equitable access to nature and heavily reduce human interaction. They are not the right answer to expansion.	7/12/2024 7:47 AM
236	I didn’t see much of anything on the bicycle network and how it will fit in with the surrounding environment. After all at the center of the expansion is a high school and students should have access to safe and efficient routes to their schools.	7/12/2024 12:22 AM
237	Climate change, ecosystem loss, equitable access to nature. Greater density is the solution, not the occupation of land that should be wild.	7/11/2024 10:31 PM
238	Please consider housing outside of single family homes. As long as we can transit to home, to work, and to green spaces, we don’t need the suburban dream which is much harder to maintain and really limits growth	7/11/2024 6:57 PM
239	Yes. We do not need to expand the UGB, in Sherwood or anywhere, to accommodate the region's growth. UGB expansion areas always just produce more high-end housing, not the more-affordable options that we need the most. Further, building new housing at the edge forces people into their cars, increasing their household expenses -- also not great for lower-income folks. We ESPECIALLY need to stop expanding the UGB far from transit. The region really f'd up in allowing Happy Valley to happen, but not planning to extend MAX to serve it. We're not planning to expand MAX to Sherwood. Therefore, we should not expand the UGB there. Simple as that. Vote no, go home, and spend some of your vacation time.	7/11/2024 6:12 PM
240	Low density development, transportation, car dependence, cost of living including transportation	7/10/2024 10:14 PM
241	Need to consider how Sherwood can be more judicious about densifying it's existing land	7/10/2024 9:51 PM
242	Metro's regulatory process bogs down housing development - development being so needed to put young people/families into their first house and put them on a road to individual prosperity.	7/10/2024 8:30 PM
243	Low density housing should not be added. Low income housing should be 50% of all new housing in expanded area.	7/10/2024 5:14 PM
244	Transportation has to be a major factor in this decision. We must greatly decrease vehicle miles traveled while increasing access to housing.	7/10/2024 12:08 PM
245	You will kill the vineyards and wineries business around here if you keep building lower income housing. And that is an important part of Sherwood/Newberg/Dundee tourism.	7/9/2024 9:48 PM
246	I did not see enough emphasis on local (city) decision making and responsibility. Plus, I did not see enough working together between regional and local government and insufficient level of public information and reaching out to get every one involved.	7/9/2024 3:43 PM
247	?	7/9/2024 3:15 PM

Q5 Please provide your comments on the Sherwood West proposal in the box below.Proposal Summary:Name of urban reserve: Sherwood West Gross acres: 1,291 acresHomes planned: 3,120 – 5,580 unitsJobs planned: 4,500 jobsThe City of Sherwood has proposed expanding into the Sherwood West urban reserve to support development of homes and jobs. The planning for this area began in 2015 and has resulted in a concept plan that reflects the community's priorities for employment and economic growth. The plan also reflects new housing regulations meant to encourage the development of many different types of housing.To learn more about the project proposal, visit the webpage.

Answered: 182 Skipped: 183

#	RESPONSES	DATE
1	This city has NOT done an adequate job of utilizing existing development nor accurately forecasted the growth. Our incredibly expensive high school is underutilized and we're paying for it as tax payers. This is not the right direction to go for Sherwood.	8/23/2024 10:11 AM
2	This is a land grab. There is no reason to disassemble rural properties & farmland, destroy peoples businesses, introduce commercial/industrial complexes (when there are empty & unleased inventory) create high density housing when research shows a decrease in population, deterioration of the level of education in the school system, and housing prices skyrocketing. I am all for growth in a measured & logical manner when the need arises. There is no evidence that supports an inclusion of this magnatude	8/22/2024 10:03 PM
3	I am totally against the growth proposal	8/22/2024 9:46 PM
4	this may not be the right place to put this, but I found the webpage difficult to navigate—it was hard to find the information I cared about and if I hadn't been wanting to fill out this feedback form, I probably would have clicked off before getting the answers I wanted. something about the navigation could be clearer (I wasn't even really sure if the right webpage was linked at first)	8/22/2024 9:42 PM
5	Sherwood currently has some of the most expensive utilities. There is no financially viable way to expand housing and businesses and keep the livability of Sherwood affordable. Sherwood is in the middle of wine country, a huge economic resource for the State of Oregon and the Metro area. Expanding the Urban Growth Boundary will cut into this critical agricultural land needed to help further Oregon's wine industry. On top of this Oregon is known world wide for its amazing views and natural beauty. Swaths of industrial parks and cookie cutter housing is no way to help Oregon or Oregonians in developing affordable and liveable housing. The current plan suggested is not a wise option for the viability of Oregon's future and I stand against it.	8/22/2024 7:10 PM
6	Sherwood is not ready for more growth. Part of Sherwood charm is open spaces, wineries, and fram land. It's rural and near major cities. Road s are not sufficient for the traffic as it is. Losing forested land would be a huge downfall and make Sherwood less desirable	8/22/2024 6:55 PM
7	To whom it may concern, As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community. Keep our small town feel! Ask people why they live here...it is because of the small town feel....do not become a Beaverton! Sincerely, Patricia Hales	8/22/2024 6:34 PM

8	I disagree with the expansion of the urban growth boundary.	8/22/2024 6:31 PM
9	I support the Sherwood West Proposal	8/22/2024 4:40 PM
10	Being a property owner in the proposed expansion area who farms the land this expansion pushes us closer to losing our lively hood. Developers are continually contacting us and wanting to purchase our property. We are not interested. This is a very large expansion request. Is all or any of this land really needed now?	8/22/2024 11:53 AM
11	The Sherwood West Fact Sheet notes that, in an expansion proposal, cities are asked to show that “development of the proposed expansion area is feasible and supported by a viable plan to pay for needed pipes, parks, roads and sidewalks.” I commend Metro for asking cities to demonstrate this. Based on the Sherwood West expansion proposal, I do not think that the City of Sherwood adequately demonstrates that infrastructure development is feasible. Appendix B of the Sherwood West UGB Expansion Proposal Part 1 discusses infrastructure funding for the proposed development area. On Page 316, Leland Consulting notes: “Across both scenarios, revenues generated under a full buildout of Sherwood West are sufficient to cover estimated infrastructure costs for sanitary sewer and parks, but not for water, transportation, or storm infrastructure.” Additionally, they note, “ It is not unexpected to find a deficit for transportation infrastructure…when considering that many local governments are challenged with funding road development and maintenance.” The proposed funding strategies on subsequent pages are not guaranteed, and they largely address upfront development costs rather than maintenance costs. A city should not be allowed to expand the UGB without the ability to pay for ongoing maintenance. With our current inability to fund maintenance, people in the Metro area are already experiencing the negative effects–why exacerbate this by further sprawling outwards? The development in the proposed expansion area will not provide the tax base required to support their infrastructure in the long-term, and it is unfair for other areas of Metro to subsidize the City of Sherwood’s expanded area.	8/22/2024 11:40 AM
12	I believe very little thought has been put into the traffic these 5,580 homes will create. Average 2 cars per home so an additional 11,000 cars will be on raods that are already conjested. Also you are going to burden the current property owners with additional taxes for improving infrastructure, roads, schools, and fire stations that these 5,580 homes will require. You are taxing the current property owners right out of their own homes just to make room for people that don't even live here yet.	8/22/2024 10:22 AM
13	Doesn’t seem like the plan accounts properly for the cost of maintain this sprawl infrastructure, and they certainly have not maximized the housing and jobs potential within their current perimeter.	8/22/2024 10:10 AM
14	The Sherwood West area consists of farms, forests, and other properties in the hills of this countryside. Most of it is not suitable for the increased traffic that this development would bring. If you are inclined to approve an expansion, I strongly urge you to reduce the amount of acreage dramatically. There are few east/west roads that connect Sherwood West to Hwy 99W (which is our lifeline to everything), and the City has no plan or intention to increase those. They have only proposed new north/south roads which won't connect to Hwy 99W. I fear we will all be stuck in a logjam up the hill unable to access Hwy 99W if several thousand new residents are put here. This is an area of sloped, narrow, two-lane roads. The intersection of Edy Road and Hwy 99 can't be expanded due to Walgreens being on one side and the Providence building being on the other. It's going to create unsafe conditions and car accidents for the existing residents along the side streets who need to pull out onto Edy Road if there are thousands of additional vehicles to compete with. If you need one example of traffic dysfunction that has been created by adding thousands more homes all in roughly the same geographic area, like the South Cooper Mountain, Tigard/West Tigard, and King City expansions, look no further than SW Fischer Rd and Hwy. 99W. Traffic traveling north on Hwy 99W often comes to a stop well before this intersection, because there are so many cars making a left turn onto Fischer Rd that they have spilled over the quite long left turn lane and are now stopped waiting to turn left while in the left TRAVEL lane of Hwy 99W. This is right in front of a TVF&R station, and the results of this grid lock traffic are going to prove tragic when an emergency arises, and fire trucks can't get to where they need to go.	8/22/2024 3:04 AM
15	The City of Sherwood, according to available information, has an employment-population ratio of about 50%. This is extremely low, even compared to nearby cities. This is because Sherwood is a suburb, with a high median income, far from job centers, and dependent on freeways for access. This sort of pattern of predominant single family homes, with few jobs, connected by freeways, is catastrophically bad for regional health. The reason Sherwood wants to expand its UGB is exactly because it requires continual sprawl to fund the borrowing	8/21/2024 11:14 PM

	it made in the first place. While I appreciate Sherwood is seeking to add additional jobs and create mixed-use neighborhoods, the fact remains they must first do this within the existing city boundaries. The city has proven incapable of mixed-use neighborhoods close to jobs and schools. Giving them more land and hoping they 'get it right' does not make sense- and it shows in the proposed zoning, which is still predominantly low-density residential. In fact, the breakdown of zoning reflects existing Sherwood zoning quite directly. I don't know why we would expect a better use of new land. To accomplish regional goals, and even to create a healthy Sherwood, we must develop existing land within the UGB so we can create financially and environmentally sustainable population growth.	
16	Please make sure this doesn't turn into typical urban sprawl that's bad for the environment and pushes out low income bipoc communities.	8/21/2024 11:11 PM
17	I am against the industrial expansion. The City has been Disingenuous about the planned use of the mixed employment area during all it's public outreach. Industrial use was only mentioned during after the outreach was finished. Do not think for a minute there is support within the city for another industrial area. Just look at their actual Sherwood West Concept Plan. They did not discuss industrial use. The plans for Elwert Road are inadequate to support the regional traffic connector role for which it serves. The City made vague statements about a north south connector. Their own traffic studies showed such a connector would not be used. Plus due to the steep slopes in the area it would be too expensive to build. The City also did not represent they would be asking for the whole area to be brought in. If Metro approves the ask, given the City's lack of transparency it is quite likely there will be a major outcry by the voters and the City Council will once again be forced to withdraw the ask. Just like happened in 2017.	8/21/2024 11:04 PM
18	this land will be on the urban fringe and will increase regional VMT substantially while creating more infrastructural liabilities. This kind of development is making us poorer and needs to be stopped. We need to stop this sort of thing by a building boom in more central areas.	8/21/2024 8:18 PM
19	Land use to facilitate industry is poor use of the proposed expansion. The land is too close to existing residential land, farm land, and protected habitat. Additionally, there is minimal exploration of a feasible way to support the growing and expanding transportation needs of the aforementioned proposed industral space.	8/21/2024 6:15 PM
20	The Proposal is not reflective of actual population growth and community needs. Expansion size is ridiculous. Fails to consider long term costs to current residents in terms of taxes to support the infrastructure that would be needed to support this plan. Tax burden analysis seems to be missing altogether.	8/21/2024 5:56 PM
21	Work on densifying existing neighborhoods instead of focusing on sprawl. Expanding the boundaries of the city will force the city to stretch it tax revenue even further than it needs to now.	8/21/2024 4:57 PM
22	For the Sherwood West expansion plan that was submitted in 2016 doesn't reflect the more recent population decline. The concept plan should be scaled back to reflect more current data and the UGB expansion should be 50% the original submission. Additionally, their concept plan doesn't adequately address the funding of infrastructure. Such a large expansion is not warranted at this time. There will be opportunities for additional land to be added if necessary.	8/21/2024 4:22 PM
23	Specifically in the Sherwood West expansion, the concept plan did not represent the will of the majority of Sherwood residents. 80% of residents did not want to see the level of expansion and were gravely concerned about how it would affect the livability and sense of community that already exists. There is no reason to add the entire amount into the UGB at this time, smaller more thoughtful expansion was never considered and the cost to add services support this vision and will be a huge burden to citizens, despite the city claiming it will not. Also the inclusion of light industrial so near many farms and vineyards is just irresponsible. Many of the discussions the city mentioned was to tout Sherwood as a gateway to wine country, yet we would do major harm to the two wineries closest to us. Also the concept plan around Elwert being similar to Sunset doesn't make any sense given the already burdened use of Elwert which will grow dramatically if the planned growth of homes and light industrial actually went in. Overall citizens have been providing specific, data-driven feedback during this process raising concerns, which the City noted but never really addressed. Yes they asked for citizen feedback, but most was ignored as citizens just saying "no growth" when in actuality we were trying to raise visibility to some of the serious oversites in this plan.	8/21/2024 3:07 PM
24	Build denser, not outwards. Suburbia can't pay for itself in maintenance once it ages a couple of decades, which is why it always needs to expand outwards for new tax bases. This is just	8/21/2024 2:39 PM

	kicking the can down the road. You can achieve all your stated goals by simply building denser in the existing boundary. Don't expand the UGB.	
25	1: Proposed Gross acres is a very large percentage relative to current existing gross acres of Sherwood. 2: Projected population growth rates, as stated in Metro's report, is much smaller than what Sherwood proposes. 3: Sherwood historically has not been a large business / employment location. The proposed jobs would change the community character, not for the better, that Sherwood currently enjoys. 4: Most new jobs would be filled by people who don't live in Sherwood, for a variety of reasons. Traffic congestion will increase. 5: Most new families that would live in the homes planned would work elsewhere. Traffic congestion will increase.	8/21/2024 11:12 AM
26	We will move out of Sherwood if it goes through.	8/21/2024 8:39 AM
27	I would prefer to keep Sherwood smaller than the full Sherwood West project proposes. I don’t mind some of the expansion but I don’t think all of the proposed zones are necessary. Let’s keep Sherwood special by not making it so easy to live here that all Our property values decrease.	8/20/2024 11:41 PM
28	Sherwood does not have the infrastructure to support the amount of development proposed in this expansion and frankly there is no need for this amount of land to be added into the UGB at this time.	8/20/2024 6:27 PM
29	I think the city of SHERWOOD is asking for way too much.. I am concerned about the logistics of where they want to put light industrial. I don’t think it’s necessary. The whole reason I moved to SHERWOOD is the small town feel. Their proposal makes me feel like I will be pinned by businesses and not the kind I want to be around. Growth is good, but it needs to be smart. I think SHERWOOD is trying to ask for the world when it should be asking for a small portion.	8/20/2024 5:07 PM
30	As a resident of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.	8/20/2024 4:55 PM
31	Allow all of the proposed increase. Growth will only happen at rate of needed services like water, sewer, and other facilities.	8/20/2024 4:52 PM
32	See above.	8/20/2024 4:22 PM
33	Expanding makes no sense without a viable Western Bypass Freeway to alleviate the already intolerable traffic load on rural roads. Without it, more density would be intolerable and irresponsible.	8/20/2024 4:10 PM
34	I vehemently oppose the expansion into Sherwood West. Previously designated Title 13 properties are now being planned to be light industrial with no thought for where the wildlife they are wiping out will go to. Elwert Rd. is already heavily traveled with 1000's of cars going by each day through an area of farmland, wineries and small farms. There is are multiple fish bearing streams at the confluence of Chicken Creek that will be greatly impacted by increased construction. None of the plans that have been presented adequately address how the bridge over Chicken Creek or re-routing of Elwert to mitigate costs is going to be paid for. The addition of the massive high school to the Sherwood area was done at great increase to the taxes of those within the Sherwood City limits and those that live outside the city limits. The Sherwood School District projected student population does not match what the City of Sherwood is projecting. In fact, the school district expects the high school population to go down. We don't need more development in a rural area when we are already paying for an expensive new school and the plans for the main arterial funding are unclear and nebulous. Now is not the time to expand into Sherwood West!	8/20/2024 3:55 PM
35	The roads immediately surrounding the proposed neighborhoods are county land and considered rural roads with a speed limit of 55 mph. Putting families near these roads seems dangerous without a proposal to address this. Also, we are putting physical barriers between our main thoroughfare, the 99, and our most famous wineries, Hawksview and Alloro, both of which are well known, with Alloro recently being placed on the top 100 in the world. We need to design pathways through Sherwood into wine country, rather than being a stop along the way to Newberg and Dundee.	8/20/2024 3:51 PM

36	I think this is a great plan in general. I would caution against too much vertical mixed-use, most of the ones I see end up with most of the commercial space vacant anyway which is such a waste.	8/20/2024 3:39 PM
37	This expansion is not supported by the current and expected growth of the area by Metros own numbers. The city has not provided adequate or reliable numbers to support this request.	8/20/2024 2:56 PM
38	Without funds to resolve inadequate access to I-5 for commercial transportation and efficient movement of local travel, expansion will only worsen the gridlock and further erode productivity and quality of life.	8/20/2024 2:04 PM
39	The city is grossly overestimating the growth in the next decade. There is no data to back up the request to add so much land to the UGB. With much of the agricultural and open land to the east and south (between Sherwood and Tualatin and Wilsonville) being gobbled up for light industrial and housing, the area is losing too much of the agricultural/natural land. Furthermore, the city has very little connection to public transportation so the proposal can only lead to worse congestion. Lastly, the City has not maximized the current boundaries for affordable housing and jobs. There are plenty of opportunities (considering the much more modest growth projections) within the current boundary if the City plans properly.	8/20/2024 9:54 AM
40	This project would make more sense if it was built in conjunction with a WES regional rail spur but it lacks a Right of Way reservation to build such a line. There is currently a plan to extend WES to Salem meaning smart TOD could also make Sherwood a commuter community to Salem in addition to Portland or Beaverton. WES currently underperforms, but if development took WES into account, it could turn into a system more like RTD or SEPTA.	8/19/2024 6:13 PM
41	Creating more jobs than housing units would be a mistake. That said, I support the proposal.	8/19/2024 12:08 PM
42	This is a terrible idea. There's already so many empty lots in the Portland region. Not to mention, so many parts in Portland where buildings could be built taller. Sherwood is already on the edge of the metropolitan area, and having this development would cause more traffic, more urban sprawl, and get us away from the core ideas of the urban growth boundary.	8/18/2024 11:24 PM
43	As a resident of Sherwood, I was wrong to be okay with this. Suburban expansion must be stopped at all costs. Let the farmers keep their land, don't let us build around and effectively force them off land their families have had for generations.	8/18/2024 10:37 PM
44	Quite literally, nobody wants this. Add density to the existing boundary.	8/18/2024 9:26 PM
45	This expansion is unnecessary. Sherwood should increase density and housing within the existing boundary	8/18/2024 8:32 PM
46	I'm sick to my stomach, the city can't is not ready for this	8/18/2024 7:06 PM
47	As a resident of Tualatin near Norwood road and the city of Tualatins Basalt Creek planning area I have witnessed first hand how promises of greater middle housing have failed to address the housing crisis in the region. Homes with shared walls selling at 450-550k and detached homes in the new development selling for 650k up to near 900k dollars. While the central city of Tualatin remains empty and uninteresting. The area around the Tualatin Commons remains an empty gravel lot and an empty parking lot at a shopping center that has lacked a primary tenet since Haggens went bankrupt 9 years ago. By voting yes on the current plan you allow cities like Sherwood to ignore urban blight like the empty parking lots around a regal movie theater that has been closed for 2 years now. If our region is serious about climate change and the housing crisis we must push for our cities to redevelop and increase density in our cores rather than building 500k dollar shared wall units and 650-800k detached homes. By voting no Metro can leverage our cities to not build out like Los Angeles and Texan cities but up like Vancouver BC and Seattle.	8/18/2024 5:12 PM
48	Do not allow Sherwood city government to do this, force them to build more infill affordable housing and less of this car dependent, road dependent suburban single family housing.	8/18/2024 2:27 PM
49	Sherwood should not be granted this UGB expansion due to the illegality of apartments and dense multi family housing in the majority of the city. Furthermore, adding sprawl to the SW metro specifically has the worst effect on traffic in the region, due to almost no high capacity public transportation. 99 is already a dumpster fire.	8/18/2024 2:27 PM
50	The citizens of Sherwood have voted several times in the past not to expand the UGB Sherwood West. We are not anti growth but we are smart growth. We don't want this area of	8/18/2024 2:11 PM

	Sherwood looking like the areas on Roy Roger's Rd(Tigard and Beaverton). My vote and 70% of the citizens that this would directly impact do not want this area annexed into to UGB.	
51	I already gave some of them, but why we need to expand by destroying farmland instead of using the ample space between Sherwood and Tigard/King city, Sherwood and Tualatin, or Sherwood and wilsonville, is beyond me.	8/18/2024 1:22 PM
52	The City of Sherwood has an apartment ban that encourages poor land use. They should stop building sprawl and instead should focus on denser development.	8/18/2024 1:13 PM
53	Looking forward to more commercial zoning for jobs and businesses	8/18/2024 1:06 PM
54	Metro should reject this plan. Cities in Washington County have the capacity to accommodate housing growth, but they maintain apartment bans across the overwhelming majority of their existing residential land. They need only to end their exclusionary zoning practices (and reduce other barriers like exorbitant SDC fees) to get housing built. I'm less familiar with the demand for industrial land, if there is a need for more I'm not opposed to a partial rejection that only allows for the employment land component of the expansion.	8/18/2024 11:53 AM
55	As a Tualatin resident, I strongly object to this plan. The transportation connections are poor, and our region has no shortage of buildable land already in the UGB. We need infill, not more fire-prone sprawl into farms and forests. Oregonians have repeatedly said no to California-style sprawl. Please listen to us.	8/18/2024 11:30 AM
56	To much to fast.	8/18/2024 7:22 AM
57	This new area is unnecessary, and will take away what makes the community unique. I moved to Sherwood, as I loved the farms and open space.	8/18/2024 6:34 AM
58	I don't think this should even be considered until we get more than one grocery store in town. I just feel like the cities priorities are way off track.	8/18/2024 1:14 AM
59	Home prices in the Portland metro area have risen by 75% or more over the last ten years. We need to build more housing desperately and are not at risk of "overbuilding" - at worst this would reverse some of the run-up in prices due to past severe undersupply. I am in favor of allowing more housing to be built as much as possible.	8/17/2024 2:50 PM
60	Continuing to develop our important farmland leads to loss of orchards, vineyards, etc, and pushes already displaced wildlife into urban areas (we have a black bear roaming in our inner Sherwood housing area this year). Our roads are in a continuous state of upgrade and expansion that STILL cannot keep pace with development.	8/17/2024 8:32 AM
61	We don't want Sherwood West Expansion to happen. We live directly on Edy Rd which will be inundated with traffic, congestion and construction. We moved here to live in a small town and enjoy the farmland and wineries nearby. We don't want to end up like Beaverton.	8/17/2024 8:06 AM
62	Keep farm land as is	8/16/2024 11:09 PM
63	I think your growth models are antiquated. Where are the people coming from?	8/16/2024 9:34 PM
64	I am opposed to the expansion as it will utilize land that is currently agricultural and it will increase congestion in the area to the detriment of the current community. It does not address the need for fixing the existing congestion problems before adding to them.	8/16/2024 4:29 PM
65	My perspective, right or wrong, is that this proposal is naturally being driven by developers - those who will benefit the most and not the citizens of our local communities.	8/16/2024 4:29 PM
66	Building in the agricultural area that is being proposed will ruin the region and the character that we all love. No one wants housing and development next to wineries and orchards. You have clearly not heard the booms of the cannons that are used to keep birds off of the grapes during harvest season or else you wouldn't have proposed this.	8/16/2024 11:47 AM
67	Traffic is already congested at certain times during the day….how will that be addressed? Affordable housing is needed but some kind of rent control needs to be considered. Love small produce farms ….dont loose those in the expansion process. (Red Berry Barn). How will this expansion affect Newberg and the proposed by-pass?	8/15/2024 12:23 PM
68	We don't need the houses here. There are already 1000 new homes and not the infrastructure for it. Then all the farmland is gone.	8/14/2024 1:10 PM

69	This is excessive and unnecessary In 2022 Metro projected Sherwood would grow by a scant 3% over the coming decades. The Sherwood School District has forecasted enrollment for the new high school will begin to decline in 2027. Sherwood has enough vacant land to accommodate new housing and jobs for years to come, when planned and developed wisely. Metro's research concluded there is enough industrial land inside the existing Regional UGB for another 20 years. Metro's research on Residential land shows most land brought into the UGB in the last 20 years remains undeveloped. This will waste our rich farmland The UGB expansion will destroy the fertile, productive lands which grow Timber, Hazelnuts, Blueberries, and world-class Pinot Noir grapes. These thrive here and in only a few other places around the world. The lands will be replaced with generic concrete boxes for "flex" office, light industrial, and multi-family residential. This will make bad traffic congestion worse Do you enjoy being caught on Scholls-Sherwood, Roy Rogers and Elwert Roads during rush hour now? Imagine adding 5,600 new homes and 4,500 jobs to the area? The jobs will result in additional commuting to Sherwood for those employees who cannot afford to live here, having a negative impact our air quality. This will increase your Property Tax burden We have not found a Taxpayer Impact Statement showing how Sherwood and its residents will pay for the new roads, sidewalks, water and sewer; just an "agreement" to figure it out later. Yes, the developers will pay for a portion of the initial infrastructure, but YOU will be left with more financial obligations to pay for the operating and maintenance costs, even though we do NOT need the new land to keep pace with growth in Sherwood.	8/14/2024 5:35 AM
70	Im opposed	8/13/2024 10:06 PM
71	It seems like Sherwood has fallen to the urban sprawl of Portland. Our small town feel has gone down and crime has increased. Many of the farms and greenspaces that makes Sherwood so beautiful are being turned into industrial buildings and high density housing. Traffic is getting worse, our roads are constantly under construction and prices to live here continue to increase. I understand the need for housing but does it have to come at the expense of farmland, greenspaces and other natural areas?	8/13/2024 8:00 PM
72	I do not support this. This is not to develop homes and jobs that better the quality of life for sherwood residents, this is to have developers come in and build tract homes, maximize profits, and do the bare minimum to get approvals, and increase the tax base to the city, county, and state, none of these bennifit the sherwood residents.	8/13/2024 4:48 PM
73	OPPOSED to the UGB expansion!	8/13/2024 3:31 PM
74	Probably too dense, but some ugb expansion is here than none.	8/12/2024 5:33 PM
75	I don't believe we are ready for growth	8/12/2024 7:24 AM
76	Sad. Its all destruction of habitat for horrible HOA non affordable housing. Disgusting and waste of money. Money that metro is no using to clean yhe streets of Portland.	8/11/2024 2:34 PM
77	Please use all commercial space currently in the city effectively before building more. Empty storefronts in existing commercial areas can be used and already built and walkable. Preserve and enhance the business industry we have before we add new	8/11/2024 10:32 AM
78	Should be approved!	8/11/2024 8:21 AM
79	Does not consider impacts on agricultural areas, existing infrastructure	8/10/2024 10:39 AM
80	Sherwood is a perfect example of urban sprawl. Farm land is being swallowed up by single family housing.	8/10/2024 7:41 AM
81	Make sure 50% of homes are single family. Provide for one-level homes for aging population.	8/9/2024 5:52 PM
82	The proposed Sherwood West proposal as written is premature for large scale development particularly for more than 5,500 new housing units in an area that has already seen rapid housing development in surrounding communities.	8/9/2024 11:23 AM
83	Voters have already said they don't want this.	8/8/2024 7:08 PM
84	The more you take away the land from farmers the bigger food problems we will have. Not to mention the negative impact on wildlife,.water supply and I creased risk of fires. This is a terrible expansion.	8/8/2024 6:31 PM
85	No more commercial growth keep land habitat as is	8/8/2024 6:26 PM
86	We need to redevelop and make the most of unutilized already developed space. We do not	8/8/2024 1:51 PM

	need to add more housing in an already overpopulated area.	
87	I support Sherwood's proposal. They have completed a concept plan in accordance with Metro's UGMFP and have adopted documents demonstrating need and ability to serve the proposed expansion area. I like the inclusion of green spaces, parks and trails throughout the plan area as well as the plan for a diversity of housing.	8/8/2024 1:08 PM
88	We are against the expansion for Sherwood West. Go north or east with the expansion please. Let’s keep the little country we have left the country	8/8/2024 11:44 AM
89	Our cities can't pay for the infrastructure we already have. It is insane to create more liabilities rather than improving and maintaining what we have already built, which is a proven platform for growth.	8/8/2024 11:27 AM
90	The community does not want this expansion-voted it down twice. The roads are not adequate to handle this expansion. Very crowded now.	8/8/2024 11:06 AM
91	Sherwood is already getting crowded with traffic congestion	8/8/2024 10:49 AM
92	I’m not in favor of thr Sherwood West expansion. I am in favor of a Sherwood north or SE expansion. No other towns are encroaching on the west. Save that for a later time. Wilsonville, tualatin, Tigard will want land on north, se. That’s where the focus should be. Traffic can come to the area on i5/& take weight off of 99w	8/8/2024 9:41 AM
93	Conserve the natural areas of our community. Don’t agree with anything else.	8/8/2024 8:53 AM
94	Stop the urban sprawl. You guys are turning Oregon into California stop it	8/8/2024 7:17 AM
95	the growth statistics do not support the need for expansion. There is ample capacity in recent expansion in the area (Cooper Mountain, Beef Bend South and King City Sherwood West is not needed at this time.	8/7/2024 8:30 PM
96	There is no demonstrated need for this; just profit-driven developers. The homes planned will not be affordable because the costs of development and infrastructure of farmland (utilities etc) will be very expensive. Also, they will not create high paying jobs nor be close to jobs for lower income people. There is no supporting evidence in the plan for the alleged 4500 jobs. They are pulled out of the air from a time long before Covid, hybrid work, AI and automation. How many people are really employed by Allison Inn as a "precedent example?" Residents of the proposed homes will need to drive to other places of employment creating even more congestion on already clogged roads that are bottlenecks to get to I-5 corridor. The plan does not take traffic into consideration or the high cost of changing major thoroughfares and building infrastructure. The proposed area is not flat and easily buildable as suggested, there is much protected wetlands. Also, Sherwood has not yet built out other available land including the parcels that were brought into the UGB previously. Also, population growth in Sherwood has slowed while this proposal suggests there is a need for 200% growth. It doesn't meet the criteria for need nor does it adequately demonstrate preparedness for infrastructure costs and demands.	8/7/2024 8:13 PM
97	do not allow this expansion, sherwood is already too expensive and the growth at the edges is not a good idea, build up, no more single family homes allowed and 75% of all new residental should be affordable for people making $60-75,000/year	8/7/2024 4:35 PM
98	Looks like a good plan.	8/3/2024 8:34 PM
99	Like I mentioned on the previous page, I don't like that the traffic study isn't done yet. The intersection of OR 99W and Sunset was at a Level of Service of E prior to the high school being built, and was projected to reach an F. This signal likely has reached a LOS of F now. Also, the Brookman expansion was approved in 2002, and it's been 22 years since then with minimum development (1 neighborhood that has gone in only within the past 2 years, and it isn't complete yet as of August 2nd, 2024). I have not seen a plan on when the rest would be developed as said neighborhood constitutes about a quarter to third of said UGB. As such, the effect on traffic and our natural area has not been fully realized. This also exceeded the 20 year development plan as proposed by what should be included in the UGB. The Tonquin employment area also isn't complete, however since that was approved more recently, it makes since. As the Brookman expansion is primarily housing based, while Tonquin expansion is exclusively job based, and at the pace Sherwood is developing, I believe that expanding the UGB to expand into Sherwood West is too large to accommodate growth for the next 20 years, and I urge a smaller expansion, or preferably, none. These 2 areas I believe contains enough	8/2/2024 11:59 PM

	land for development for the next 15-20 years, especially with Sherwood's track record to delay Brookman's annexation and development. would also like to see a specific plan for housing and transportation (public and auto transportation). I also would like to see a cottage community, as a crossover between high density apartments/condos, and single family low density homes. Also would like to see a plan on schools, as the high school was designed for the Brookman expansion, but not further beyond that based on their arguments in their 2016 ballot measure (I forget the name of said measure). Also where would a new elementary and, if nessesary, middle school be placed?	
100	I support sherwood’s proposal	8/2/2024 12:32 PM
101	The city of Sherwood is growing at a rapid pace, most families move here for the schools and the environment. I'd like to see better options for affordable housing, however the fees and permits that come with this do not match this goal. I also would like to see the city plan for this expansion better than how they built Brookman and the High School. Having a new high school that does not have sewer and has been delayed is not an efficient plan and I would hate to watch them continue to run into these road blocks. It would be better to engage with a more sophisticated panel, like the city of Wilsonville when they planned and built Villebois. I also think it would be good to have a roundtable discussion with medium sized and national builders.	8/1/2024 12:35 PM
102	They need expanded area to expand commercial areas to provide more jobs for the residents of Sherwood to reduce travel time for the residents. They are developing one huge shopping area at 6 Corners and Old Town, but not providing any small neighborhood commercial shoppin areas.	7/30/2024 9:01 AM
103	the plan is well thought out. it has been in the works for years and asher wood is ready and willing. It is whetenthenUGB should be expanded	7/30/2024 7:17 AM
104	4,500 jobs, what type of jobs, and are they sustainable?	7/29/2024 9:37 AM
105	I question whether it is truly necessary for Sherwood to convert all those acres from rural to suburban use.	7/28/2024 8:38 AM
106	Too small. We need more. Time to start thinking big about how we create new cities, new city centers, new homes. We need this but we need more than this now.	7/25/2024 7:23 PM
107	I’m in favor of development around the high school. Housing and mixed use should go into the surrounding acreage.	7/24/2024 5:38 PM
108	This is a fabrication. Expansion here will not be affordable in the long run. Build more housing in areas already within Portland.	7/24/2024 7:34 AM
109	Our family approves expansion on Kruger Road above Sherwood High School for the purpose of housing, mixed use developments to support the residents of the community.	7/23/2024 9:24 PM
110	Just build more densely, don’t expand. The city goes from forest grove to Sandy already, it doesn’t need any more sprawl	7/23/2024 8:57 PM
111	I’m in support of this plan because it enables the growth needed and keeps the community and neighborhood design that makes Sherwood unique. It also allows for employment opportunities that is needed.	7/23/2024 8:33 PM
112	I don't buy that there's enough demand for new suburban housing to actually support this proposal. This sounds like more wishful thinking from a jurisdiction that loves its suburban sprawl. Expanding the UGB to create new housing on the farthest corners of the region purpetuates the worst car oriented development that will result in more carbon emissions, less farmland, and more suburban infrastructure that the city can't afford to maintain. The fact that the planning began in 2015, predating the middle housing infill reforms, indicates to me that the City of Sherwood already has no desire to moderate the worst kind of car-only development in the region. I encourage Metro, on the basis of the data in the urban growth analysis, to decline to expand the UGB.	7/23/2024 6:44 PM
113	This is not needed. Money is the reason this is being pushed	7/23/2024 6:22 PM
114	What is planned and what gets done are different things. But what is ruined happens first and what is not done is last. Planners are not realists and dont give excrement about what happens to individuals. This is not future it is invasion of now.	7/23/2024 3:26 PM

115	I do not think the plan adequately integrates mixed use and comercial space with spaces people actually live	7/23/2024 3:20 PM
116	Sherwood has always been known for its scenic farm and agriculture areas outside the city limits. It is important to keep that way of life in tact. Several land owners have livestock and crops that will be negatively affected by the increased traffic and pollution by putting roads through. Please keep the trafffic flow on Elwert by improving the existing road, instead of diverting traffic north, ruining the creek/wetlands and agriculture areas.	7/23/2024 2:20 PM
117	The concept plan represents the planning committee's desires, and many citizens and community groups oppose the expansion.	7/23/2024 12:12 PM
118	The City of Sherwood's plan is much too large and is predicated on population growth figures which are wlidly inaccuarte and self-serving. This area is not growing as it was when the concept was first developed and it needs to get in line with current forecasts and trends. The very nice, but VERY expensive example of relying on inaccurate numbers. We now have a current enrollment of 1,704 students. The high school has a capacity of 2,400 students. The forecast for enrollment for 2032 is 1,530 students. It is obvious the figures used to support the building of the school were inaccurate and it has caused our community to spend excessive amounts of money needlessly. It should have been a smaller school. And similarly, the City's current plan should also be scaled back to reflect CURRENT numbers of population and growth in this area. And until such time as there are no possibilities for development with the UGB, farmland should remain untouched. You can't eat a house.	7/23/2024 11:49 AM
119	The area is losing residents. There's no reason to extend the growth boundary. Gentrify downtown instead of ruining natural landscapes and destroying more farmland.	7/21/2024 9:02 AM
120	Maintain urban growth boundaries and increase density	7/20/2024 9:13 PM
121	I actually totally disagree that the urban growth boundary should be expanded at all. We must build densely within existing urbanized footprints.	7/20/2024 7:41 PM
122	The proposal gets a lot of things right. The biggest piece missing is a comprehensive plan for transit in the area. I think the number one priority for the new area should be on reducing VMT for daily errands by providing good bike paths and walkable 15-minute neighborhoods. This is something that is easier to control at this stage in the planning. However, people will want to get out of their neighborhood to access amenities, and there are not very many options for how they will do that. This makes living in the area less accessible for people with disabilities who cannot drive (like my own father) or younger people who cannot afford a car.	7/20/2024 9:49 AM
123	The UGB is one of the defining features of the region, and continuing to add sprawl instead of efficiently using our existing resources is regressive and backwards thinking. Please reject this proposal and encourage upscaling existing development and lands in already underutilized lands within the UGB.	7/19/2024 2:09 PM
124	This is the definition of car-dependent sprawl and should not be allowed.	7/18/2024 10:23 AM
125	The City of Sherwood is not making the best use of already developed area. Too much space is devoted to driving cars, parking lots, and car centric behavior. No further expansion should be considered until the current city of Sherwood is fully integrated within our regional transit infrastructure and people are able to reliably commute between the downtown Portland core and Sherwood town center.	7/17/2024 11:19 PM
126	I am very glad to see mixed use and higher density development in an area outside the city center! I hope this area surrounds a school that walking and cycling to school is a easy and safe, as well as the preferred modes of traveling to school.	7/17/2024 6:51 PM
127	This is an absolutely terrible plan !! The roads can’t handle the cars, the schools are over crowded, crime is on the rise THIS IS PURE GREED. 🛑Provide service for the people that are here, stop trying to line the pockets of already rich developers!!!!!!!!	7/17/2024 6:09 PM
128	See my earlier comments about how I think the plan is baloney and only is more of the same.	7/17/2024 2:24 PM
129	This plan creates too much low density housing. This kind of housing is not what we need to be creating to increase affordability in our region. This expansion will create an exclusive neighborhood that is only for the rich. We need more NW 23rds not more Lake Oswegos.	7/17/2024 9:23 AM
130	I do not support the expansion plan for Sherwood. Simply a land grab for easy development. Requires minimum planning and effort in a goal to just throw up more houses near the new high	7/16/2024 8:50 PM

	school. There needs to be more consideration for walkability in the town and utilizing the current space to create a tight city with an actual community. Do not continuing splitting the town on both sides of 99	
131	The proposal is too prescriptive in terms of land use. The long-term vision should focus on identifying placement of public infrastructure (roads, water, sewer), delineation of plots and parcels, and locating of public and environmental resources such as parks and other habitat/wetland areas. The market for housing, industrial or commercial areas should drive the development of plots for these uses. This will permit the maximum amount of flexibility into the future. I also see that no representative from TriMet was involved in the Technical Advisory Committee. We need to ensure that future growth areas are suitable for transit service, both in terms of operations (can the bus actually get through here efficiently) but also in terms of whether the land use is mixed enough and density high enough to support a bus line.	7/16/2024 8:38 PM
132	The City has made two concerted efforts to plan for this area. The City provides for a variety of housing, but it's harder to develop multi-family as the Council and PC prefer single-family housing. If the City can commit to achieving the densities prescribed within their proposal, they should be able to expand.	7/16/2024 4:56 PM
133	This expansion appears to be well thought out, and should be welcomed in the region. It is sad that the Sherwood West proposal is the only one.	7/16/2024 9:06 AM
134	We need it - but I’m afraid of what it is going to do to our small town.	7/16/2024 8:13 AM
135	Sherwood needs to do a better job of creating low income housing.	7/16/2024 8:00 AM
136	The survey is one-sided and useless. It is like asking whether you would prefer to be killed by poison or hanging. There is no compelling reason to do this. Sherwood does not consider current minimal population or job growth estimates. Negative responses are not considered or minimized. Public involvement was just scripted lip service. Example...open house. Vote on your preferences. "None of the above" was not an option. This is only about MONEY, tax for the city and money for developers (and a few land owners who may profit).	7/15/2024 8:47 PM
137	I do not believe this is a good idea and do not recommend it.	7/15/2024 7:54 PM
138	This is sad and horrible!	7/15/2024 6:48 PM
139	Having previously lived on the outskirts of Sherwood, I don't support the expansion: Big houses, high incomes, lack of diversity in housing and people (it's where Northern Californians relocat to be part of the nascent wine culture). You can't buy a house for less than $500K . It's lovely, don't get me wrong, and we need more high-income sprawl NOT. Its an incredibly homogenous community. No-let's see how the Roy Rogers annexation turns out first.... and what in gods name are you going todo about the traffic. Tell Sherwood they can annex once we have light-rail to Tigard.	7/15/2024 6:47 PM
140	Yes	7/15/2024 5:30 PM
141	Too much traffic. Need public transportation!	7/15/2024 5:14 PM
142	Without a westside bypass, how will existing and increased traffic access freeways?	7/15/2024 4:05 PM
143	The city of Sherwood is biting off more than it needs. The majority of people in our area are NOT for this unnecessary expansion. I am not against growth for our city, but to attempt to increase it by 42% at the expense of family farms, wineries, and forested areas is an affront to our country-like community.	7/15/2024 3:37 PM
144	those choices of three in the above question are tough! All are important so I am not necessarily committed to my choices. I think the Sherwood expansion is appropriate.	7/15/2024 2:17 PM
145	Approved	7/15/2024 1:19 PM
146	This is Sherwood West is simply more sprawling expansion that is auto-centric and auto-dependent. The housing "mix" merely gives this an acceptable veneer. Where is mass transit? Upzone areas close to mass transit. Do not put single family development and multi-family development on the outskirts of the UGB. This sprawl, plain and simple.	7/15/2024 1:16 PM
147	I do not support Metro overtaking the small quaint town of Sherwood!	7/15/2024 1:14 PM
148	This should not be approved. Sherwood, Wilsonville, and Tualatin are currently in the process of wasting one of the largest industrial sites already within the UGB by each separately	7/15/2024 1:04 PM

	seeking development, often on small, 10 acre parcels. At a time when some think the region needs more large industrial parcels, these jurisdictions are wasting a huge area, already within the UGB, that should be developed as a single unit. Consequently, giving Sherwood more land for any purpose is like rewarding them for bad behavior. Fundamentally, if jurisdictions are doing a poor job with the land they have, they shouldn't ever qualify for additional urban land. Metro needs to find a way to be firm, clear, and consistent. Right now it seems to be afraid of its shadow.	
149	Don’t let it be as awful as the development on schools and Roy Rogers. It’s so ugly and dense and doesn’t have services like grocery stores.	7/15/2024 12:44 PM
150	If you build it, they may or may not be able to afford it. Factor in housing costs before building more housing. Build up not out	7/15/2024 12:42 PM
151	Sherwood proper needs to allow apartments. As an affordable housing developer, I can tell you they are not friendly to multifamily inside the original downtown core where increased density makes a walkable community.	7/15/2024 7:29 AM
152	There's already too much growth in this area.	7/15/2024 6:36 AM
153	I am not well informed but want a full size library branch in that neighborhood.	7/14/2024 5:41 PM
154	The mixed employment area near Elwert/Scholls-Sherwood looks like a recipe for warehouse/data center blight and traffic.	7/14/2024 4:00 PM
155	Metro can’t even manage Roy Rodgers and Tualatin Sherwood Rd. as it is. Adding 3,000+ homes is just foolish and an obvious tax grab and money scheme by developers.	7/14/2024 3:39 PM
156	Leave agricultural land, green spaces and wetlands alone. Plant trees in already developed areas. Limit growth to areas with established city water supplies and leave all wells and groundwater areas out of development. Keep manufacturing and all big business ventures out of Sherwood. No data centers or any polluting influences of any kind.	7/14/2024 3:29 PM
157	Please see my thoughts on the Sherwood West Project in my previous comment. The Lebeau and connected Edy road project is unnecessary and will impact the residents of this area as well as the environment negatively. Wineries in this area are concerned with the potential negative impacts that developing this area will have. This area is home to many creatures that will be further pushed out and harmed due to this plan. Sherwood needs to have some natural areas maintained and I hope we will not lose what makes Sherwood beautiful so that others can profit. Tualatin-Sherwood road has been developed so much and is an embarrassing eyesore for our community. Please do not strip every piece of beautiful land and turn it in to a soulless development. I am very much opposed to that portion of the Sherwood West plan. Those that presented this plan did not discuss their intentions with residents of the area and have lied to Metro about the support for the plan.	7/14/2024 2:24 PM
158	Stop the Sherwood West development. The rural community that is a risk does not get to vote for Sherwood City officials who have made the choice to ask for expanding. We DO NOT want this to go in to effect. We don't want to lose our farms. We don't want to lose our land. We don't want to lose our trees. This is not necessary for Sherwood. We don't need to expand, we have other options. This would be a huge negative impact to the native plants trees and eco system that thrive in this area. We didn't need to bring that large of population and business that close to the wild life refuge. This needs to stop. The community on Lebeau Rd do not want this.	7/14/2024 12:02 PM
159	I believe that this proposal does not meet the goals of the region. To start, the proposal does not state whether there will be added transit to the region, or whether bike infastructure will be included. Combined with the fact that a large portion of the housing area that will be developed is planned to be low density means the newly developed area will just be more car dependent sprawl, as many of these new residents will have no other choice but to drive. The portland region does not need more cars driving through the area and commuting between work, home, and other activities, as it is known how bad cars are for our enviornment. More cars commuting from sherwood will also mean more traffic through the southwest area of the portland region, which already suffers from congestion around the I-5 corridor and a general lack of density and transit access. After looking over the area closely with satelite imagery through google maps, it is clear that sherwood has plenty of land to infill and add density, especially near the only 2 trimet bus lines serving the region. Through redeveloping various seas of parking lots, and empty plots of land, I believe the city of sherwood already has	7/14/2024 11:44 AM

	options to develop land and add real density where it matters, instead of continuing to develop urban sprawl as is evident by the contents of the proposal.	
160	No more expansion. Keep and maintain what is already in Sherwood. Creating more housing in not a solution	7/14/2024 10:51 AM
161	The city of Sherwood has not demonstrated a need for this large of an expansion plan. Land recently added to the UGB for commercial development has not been completed, so why would the city of Sherwood even more land for this purpose?	7/14/2024 10:30 AM
162	Too many homes!!! Please stop!!!	7/14/2024 10:27 AM
163	No more growth. We are being squeezed and traffic is horrible.	7/14/2024 10:15 AM
164	This is a poorly planned, unneeded, and irresponsible amount of growth in a region that is surrounded by and supported by active agriculture and farming land. Sherwood hasn't even fully developed the land on the East side of the city for commercial use, but says it needs additional land for increased tax revenue. This commercial land that is currently in the plan is for manufacturing, which is more geared toward robotics and mass production, with few employees, rather than employment of several community members to benefits the community. This proposal exposes the area to more pollution, environmental toxins and exposures and will damage existing agriculture, farmland, and natural space. Please reject this proposal in its entirety.	7/14/2024 10:10 AM
165	Way too much low density housing and needs more of a wetland buffer. Needs more commercial and shops by the high school for kids during lunch.	7/14/2024 9:29 AM
166	I think Metro should institute minimum density standards. Density before expansion.	7/14/2024 12:10 AM
167	The proposed infrastructure funding plan is vague at best. Relying on SDCs and "outside"funding is insufficient. No expansion should be considered until there is a concrete committed plan for the infrastructure funding.	7/13/2024 11:09 AM
168	The amount of proposed mixed use are is extremely small but this type of planning can be more beneficial for the city. With current plan it just increases sprawl and carbon footprint.	7/12/2024 11:46 PM
169	I just want to emphasize that the Portland area needs to focus on creating more density and creating spaces that are focused around building an enjoyable community. In my opinion, this would be through walkable and bikeable areas alongside spaces were the community can gather without the need of cars. This will maximize the efficiency of the space and take big steps towards addressing climate change issues. We should do this with current spaces within metro area limits rather than expanding outward, leading to more sprawl which is bad	7/12/2024 8:20 PM
170	I am against it.	7/12/2024 6:15 PM
171	My neighbors and myself are in favor of expanding into the Sherwood West reserve. There is very little farmers in the 1,291 acres. We are right above the new High School and there needs to be more growth.	7/12/2024 1:16 PM
172	The inclusion of mixed employment is a welcome one but I must restate that such space should not be made to cater to large retailers and must be kept for local small businesses, as I have stated earlier, mixed use zoning is imperative and although included it lacks slightly, as well as the amount of low density neighborhoods are too high. Something else I have also not seen anywhere is a lack of cars, although this may fall outside the scope of this proposal pedestrianized areas that restrict or exclude cars are a key part in making mixed use areas enjoyable and in encouraging biking and walking	7/12/2024 7:36 AM
173	Hopefully achieved home numbers are at the high end of the figure if not exceeding it. We do not need unnecessary sprawl.	7/12/2024 12:25 AM
174	If new urban areas are claimed from existing undeveloped land, these areas MUST be high density and transit oriented. These areas should discourage automobile transit. Reference Utah City. However, the best solution is to NOT expand urban growth and to preserve undeveloped, natural lands.	7/11/2024 10:35 PM
175	There is no plan to expand MAX or any other high capacity, high quality transit to Sherwood, much less to the expansion area. Shame on you for not even mentioning transit, or regional bicycle network connectivity, in the factors that are the most important to consider as the City, and especially the REGION, consider expansion.	7/11/2024 6:14 PM

176	No more sprawl. Sherwood needs to focus on building over their ridiculously huge parking lots and empty monoculture grass fields.	7/11/2024 4:30 PM
177	Do not expand the UGB and force our marginalized communities further out into the margins of our metro area. This plan has no vision for how people who live here will circulate or travel to jobs outside of this ultra suburban development.	7/10/2024 10:17 PM
178	Sure, allow Sherwood to expand. But don't stop there, let other cities and counties expand too.	7/10/2024 8:33 PM
179	Urbanf growth Shou only expand of housing built is all high density and half the units are reserved for low income families.	7/10/2024 5:18 PM
180	The goals of the region sound great on paper. The primary factors of consideration are whether the plan actually meets those goals, and whether implementation of the plan can result in meeting those goals. How is the proposed expansion region meeting the goal of having 'the option of living close to work' if the industrial area is separated from the large majority of the residential area (including all of the mixed use and commercial area) by the Title 13 conservation land around Chicken Creek? These considerations should at least be addressed by the plan. Additionally, how can we be sure that Sherwood as a city will be able to provide the urban density that our region needs (to meet our goals) when vanishingly little of the city's existing development is dense or mixed use? Sherwood's downtown area is barely two blocks in size. If Sherwood was able to guarantee such development, meeting our region's goals, I would be happy with the plan and its UGB expansion. More housing is more housing, and we need more housing, but we can not just keep expanding with suburbs.	7/10/2024 12:35 PM
181	No one besides the developers that will profit off building more houses/apartments wants this expansion. Please listen to the majority of the residents in Sherwood and DO NOT EXPAND. We’re good as we are and the small town feel has already diminished too much even in just the past 10 years. Don't make it worse. We don’t want to be the next Beaverton and then Portland. We want to feel safe.	7/9/2024 9:55 PM
182	Sorry I could not figure out how to rank the elements. Not sure I did that right. We should be able to number them 1 through whatever. Always the involvement and engagement of the total community comes first.	7/9/2024 3:48 PM

Q15 Is there anything else that you would like the Metro Council to consider as they make a decision about whether to expand the Urban Growth Boundary as described in the Sherwood proposal?

Answered: 218 Skipped: 147

#	RESPONSES	DATE
1	Consider the voice of the people who have lived and thrived in this area, those voices don't appear to be heard in this matter.	8/23/2024 10:13 AM
2	I do think there needs to be more opportunity for affordable housing . It seems crazy to have a huge high school with almost no houses around it ?	8/22/2024 9:57 PM
3	Slow down	8/22/2024 9:48 PM
4	please consider that the expansion decision should benefit all residents, including those in historically underserved communities, by providing affordable housing and accessible public services. Please also make a decision that will ensure strong environmental protections. It's a lot to balance, and reading the reports makes it clear that this is complicated without any one "answer" to what/how to decide—I think it is most important to make the decision about expansion that will guarantee that these priorities are being worked toward.	8/22/2024 9:45 PM
5	This plan is bad for Sherwood, bad for the Metro area and bad for the future of Oregon and Oregonians.	8/22/2024 7:13 PM
6	Please listen to those who live in Sherwood about what we want in terms of the UGB.	8/22/2024 6:57 PM
7	Leave Sherwood how it is and do not expand the boundary	8/22/2024 6:35 PM
8	There is a plethora of empty warehouses and houses that can be renovated. Do this before taking any more farmland to build more buildings	8/22/2024 6:32 PM
9	No. I think it is a good plan.	8/22/2024 4:41 PM
10	The expansion area intrudes into farmland. The existing/planned roads are already inadequate for traffic transiting the area. McMansions should be restricted.	8/22/2024 1:31 PM
11	Thank you, Metro Council, for listening to the public. I encourage Council to be extremely cautious about expanding the UGB. We should focus on further developing our existing area within the UGB rather than expanding Sherwood at this time.	8/22/2024 11:43 AM
12	If you are going to increase the Urban Growth Boundary in the Shewood area, Please don't approve it all. The area around the enourmous high school would be plenty. That land is already ruined so don't ruin any more.	8/22/2024 10:30 AM
13	Please do not expand urban growth boundaries, when there is so much opportunity for density and walkability in the existing perimeter.	8/22/2024 10:11 AM
14	Yes, making development pay for itself should be required. I don't mean just a one & done upfront fee/SDC. After a developer pays their one-time SDCs, they get to run away with millions of dollars in profit, while the existing residents are left with the traffic congestion (and frustration) as well as the burden of paying for new schools, new roads, new water facilities, new fire stations, and staffing in these new facilities due to the increase in population their development has created. I'd like to remind you that many of us are retired and on modest fixed incomes. "Affordable housing" means more than just the purchase price or cost of rent - it also means not taxing seniors out of our homes. Dramatically increasing our property taxes via bonds and levies is doing exactly that. Instead of giving developers price breaks and incentives, they should only be allowed to build if it doesn't adversely affect the pocketbooks of the existing population in the area. The other critical concern is the environment. As I've mentioned, this is an area with forests of mature trees. We are in a climate crisis, and these trees help us by providing shade, sequestering carbon, preventing erosion, and providing wildlife habitat. When you replace trees with concrete and asphalt, the whole area heats up.	8/22/2024 3:12 AM

	Saying that developers replant trees is a joke, because these tiny little trees with a diameter of your thumb are not even remotely equivalent to the large mature trees they have destroyed in their quest to become even richer. Many neighborhoods in Portland have "heat islands", and the City is trying to plant more trees to combat the rising temperatures - wouldn't it make more sense to not cut them down in the first place? What's even worse, is that they clear the land then set what they've cleared on fire! There is a property on Scholls-Sherwood Rd & Elwert Rd that has burned every day for months at a time. The property is very close to the Tualatin National Wildlife Refuge.	
15	The mixed employment area expansion into protected upland wetland habitat was done after the public outreach with no community input. The reference to industrial use was not used during public outreach; Only after public outreach was finished. Bringing in the industrial development on the north end of Sherwood West should not occur unless the citizens of Sherwood have a good faith opportunity to weigh in. Before Metro Commissioners decide they should have their staff review the final plan, but also the communications during the various meetings. You will see what I say here is true. The plans for Elwert Road would degrade the regional connector role it serves. Traffic on and off of Hwy 99 has major delays during rush hours. These conditions have persisted for years and will only worsen if all of Sherwood West is brought in at this time. The City and County need to improve the capacity of Elwert Road, and it's Hwy 99 connection before adding so many homes.	8/21/2024 11:19 PM
16	don't do it, don't do it, this is the opposite of what we are supposed to be doing.	8/21/2024 8:19 PM
17	The concept plan proposed described a mixed employment zone, which included, industrial use, that was not advertised untill after the public outreach peroid was complete. It is not fair, or reasonable, to state the residents of Sherwood are in agreement with industrial zoning in the northern region of the proposed expansion. During the public outreach of the Sherwood West concept plan, mixed employment was represented as a mix of office, light industrial, and flux space. However, after public outreach, the need for industal manifacutring has been a major emphasis of the plan and further dialogue. It is not a good faith statment to suggest that residents of Sherwood are informed of the expansion plan, let alone support industrial use of the aforementioned land.	8/21/2024 6:39 PM
18	Consider who is pushing for this concept - voting citizens or developers and city officials? Follow the money and you'll see. Last survey showed over 80% of voters did NOT want this.	8/21/2024 5:59 PM
19	Consider the impact it will have on current plans to make walking, biking, and transit a more viable alternative to driving.	8/21/2024 4:59 PM
20	Sherwood overbuilt their high school and now the operating and maintenance costs are more on a per student basis than projected. Don't make the same mistake with the UGB expansion, scale it to meet current needs and reflect recent data. This expansion size may have made sense with the growth from 2000 but it doesn't now. You will be trading a vibrant and valuable agricultural area into a land speculator's dream.	8/21/2024 4:31 PM
21	Oregon is a unique state due to its urban growth boundary and early efforts to preserve the beauty and productivity of agriculture. Every time the growth boundary is usurped we loose a little more of that unique quality.	8/21/2024 3:54 PM
22	I would encourage the Council to really consider is it necessary at this time to bring so much land into the UGB, given the data provided on slower population growth than expected and adequate light industrial already available in the UGB. Please tell the city to go back with a requirement to reconsider smaller parcel at this time and to have a more comprehensive traffic study done in conjunction with WA county and ODOT on what the impact will be to our roadways before allowing this much growth to be approved.	8/21/2024 3:11 PM
23	Don't do it. It can't pay for it's own maintenance in a few decades just like Portland can't now. You can achieve all those goals by building denser in the existing UGB. Something other than suburbia might even make Sherwood worth visiting.	8/21/2024 2:42 PM
24	Metro states the "Urban Growth Report" will document whether more land is needed. After a brief review of the Executive Summary, I did not see an answer to this question. Is more land needed? Evolutionary growth planning is required to enhance and maintain the quality of life in a metropolitan area. Sherwood's proposal is Revolutionary, NOT evolutionary. Given recent slowing growth trends, it seems wise to grow gradually, minimizing the occurrence of un-intended consequences. Thank you for your time and consideration.	8/21/2024 11:23 AM
25	Land developers and politicians. Somebody is getting greased.	8/21/2024 8:44 AM

26	Sherwood is asking for to much land.	8/21/2024 7:17 AM
27	Single family homes or 10k+ square foot lots.	8/20/2024 11:42 PM
28	The size of the requested expansion is not supported by facts and the City of Sherwood should be asked to reevaluate the expansion request and right size it to suit the true growth potential for this area.	8/20/2024 7:59 PM
29	Sherwood is a small town and the projected future population growth in no way reflects what is proposed in this expansion. Hundreds of homes are currently being built and retail locations sit empty as retailers have left the area. Sherwood needs to revitalize its existing areas before trying to grow.	8/20/2024 6:37 PM
30	Holly ochoa, Steve ford, and I are all interested in working with Sherwood planners to bring in our 20 combined acres for mixed use and or housing.	8/20/2024 6:28 PM
31	Think long and hard and don’t be swayed by paid consultants who will benefit from growth	8/20/2024 5:09 PM
32	once its gone its gone	8/20/2024 5:00 PM
33	Push back against the people who’ve got there’s and want to limit others.	8/20/2024 4:53 PM
34	Preserve the few remaining farms, green space, access to the outdoors.	8/20/2024 4:30 PM
35	Please see my comments above. The proposal is a wild overreach and should be denied in its entirety.	8/20/2024 4:23 PM
36	Please listen to the Sherwood Farm Alliance. We have presented facts that conflict what city leaders and builders are promoting. We DO NOT have the roads and infrastructure to support this massive increase in acreage into the UGB. Our land is too precious to pave over with the amount of housing suggested, and metros own projections of growth are SIGNIFICANTLY lower than the projections of the city. Just check out the numbers they said we were going to grow for our new high school just a few years ago, the growth numbers were way off base. We built a massive high school that is not at full capacity, and affected all of our taxes and we are still paying off all the infrastructure for that, I think the average Sherwood resident cannot support another massive build in our area that makes the builders rich and leaves the city residents to come up with money for more schools, more roads, more infrastructure and also destroys our beautiful land, thank you	8/20/2024 4:19 PM
37	Do not expand and thereby put further pressure on existing Title 13 refuges for wildlife. Current forest land should be preserved, not destroyed by replacing it with houses.	8/20/2024 4:16 PM
38	We were very involved in the 2016 Concept Plan that the City of Sherwood completed prior to the current Concept plan. It was very evident that the City had an agenda both for the 2016 concept plan and the current concept plan that while they promoted community input, despite hours of involvement, we saw little to no interest on the City's part to make any concessions or listen to the small farm owners in the area being considered. They went through the motions of "listening" to opposing interests, but there was really no interest in farm/wine/small woodland farmers interests. We provide jobs too. We bring in income that contributes to the benefit of all through our taxes, but we are not big enough to be considered as worthwhile contributing members to our community and it is better to bulldoze our properties than to allow farming/winery/woodland enterprises to continue in this area.	8/20/2024 4:00 PM
39	Please reject Sherwood proposal to expand the UGB.	8/20/2024 3:56 PM
40	Don't expand it. Enough land in current boundaries to meet needs for many years.	8/20/2024 3:56 PM
41	Available lands for housing, and SDCs, could be the single biggest driver(s) for affordable housing. The laws of supply & demand are not broken, and housing is too expensive in Oregon!	8/20/2024 3:43 PM
42	Listen to the home and property owners who will be most impacted by the permanent loss of agricultural land as well as the lack of existing roads and infrastructure costs that will impact the community.	8/20/2024 3:02 PM
43	Listen to the local citizens and what they have to say. Read the Save Sherwood West concerns.	8/20/2024 11:03 AM
44	I am STRONGLY OPPOSED to the expansion of the UGB as proposed by the City of Sherwood.	8/20/2024 9:56 AM

45	East-West transit/transportation connections, especially to Oregon city. If Sherwood was built as a denser TOD node, then it could help the region develop as a less congested grid.	8/19/2024 6:16 PM
46	develop existing land in the UGB, we will not be able to utilize an expansion, and it is a waste of money, resources and the environmental impact will be irreversible	8/19/2024 12:50 PM
47	Consider transit planning.	8/19/2024 12:08 PM
48	Expanding the urban growth boundary is a horrible idea. We need to build more housing in the land that is already a part of the UGB. We have plenty of room already. The urban growth boundary is already too large in my opinion.	8/18/2024 11:25 PM
49	I beg everyone at Metro considering this, don't let Sherwood have this land. We've already lost the kindness here, we don't need to further it with a larger population.	8/18/2024 10:42 PM
50	Eh, what’s the point. The Boomers are going to do it regardless. This process is a formality :-)	8/18/2024 9:29 PM
51	We should continue following the growth trends that allowed this area to become so unique in its development. Strong growth boundaries and ensuring walkable, inviting, and friendly places are what make the Portland area a destination, not sprawl	8/18/2024 3:47 PM
52	Don't violate the integrity of the UGB to satisfy the poorly zoned single family housing suburban expansion of Sherwood.	8/18/2024 2:29 PM
53	Density, public transit	8/18/2024 2:28 PM
54	Metro and The City of Sherwood work for us not the other way around. 70% don’t want it. Why can’t you respect the wishes of the vast vast majority of citizens!	8/18/2024 2:15 PM
55	I'd like you to consider WHY you need to expand the UGB in an area with limited growth expectations where there are no projected shortages in available space for the next 20 years? And why you need to do it in the direction of farmland?	8/18/2024 1:24 PM
56	Do not expand the UGB.	8/18/2024 1:13 PM
57	I like the plan. I know there is an opposition group but there are those of us that support the plan too	8/18/2024 1:08 PM
58	Sherwood has space for more density instead of further sprawl.	8/18/2024 12:51 PM
59	The 2040 Growth Concept Plan has been a failure. The regional centers and town centers it envisioned have almost universally not been built out. Metro needs to create a new regional plan that has very prescriptive rules for cities, and has actual mechanisms built in that ensure development happens as planned. We have a dire housing shortage, and we need to take it seriously. We have had these UGB expansions every few years for decades now and it hasn't been enough to end the shortage because the problem isnt a lack of land! The problem is and will continue to be that cities enforce apartment bans, take many months to get out permits, and charge 10s of thousands of dollars in SDC and permit fees. Reject this plan and get to work solving the actual underlying issue.	8/18/2024 12:01 PM
60	Please consider the type of climate impacts, fire risk, and transportation challenges that will accompany this proposal. Cookie-cutter suburban tract homes is not the type of housing that will be climate resilient. Please think better of this status quo proposal. We need a course correction for the better. Please vote to deny this application.	8/18/2024 11:33 AM
61	Think about the whole picture…and the impact on the land.	8/18/2024 9:42 AM
62	Our city leaders are not listening to its citizens. YOU MUST listen to us. We do not want this here!	8/18/2024 7:51 AM
63	Does Sherwood really need to look like phoenix?	8/18/2024 7:24 AM
64	I don’t think Sherwood is ready to expand the urban growth boundary	8/18/2024 1:17 AM
65	We need more housing in the entire region! Allow land owners and developers more freedom to meet the needs based on a free market.	8/17/2024 2:51 PM
66	I was offended a little bit at the Council presidents comment that we only have three people of color at Sherwood high School. I would encourage her to come visit us for our Diwali festival,	8/17/2024 9:15 AM

	or our moon lantern festival to see the hundreds of people from Sherwood who are attracted here because of our good schools.	
67	Our schools and roads are at max capacity already. We are already developing several areas with houses and industrial/commercial buildings. Sherwood needs to stop, study, and evaluate the impact before bulldozing ahead with more development to the detriment of our farms and wildlife.	8/17/2024 8:35 AM
68	Please, please do not allow this to happen. Our children are already in classes of 30+ kids, we don't need more crowding. We enjoy our small town and will be forced to leave if this happens.	8/17/2024 8:08 AM
69	Leave as is	8/16/2024 11:11 PM
70	Less multi unit housing	8/16/2024 9:56 PM
71	Sherwood doesn’t need to become another Beaverton. Is there a real need to turn Sherwood into a crowded traffic congested mess?	8/16/2024 9:37 PM
72	When deciding such a significant proposal please make sure and challenge when in doubt, that the local representatives have taken all prudent measures to insure they fairly represent their communities.	8/16/2024 4:35 PM
73	Sherwood city council has lied to you. There was no input from the residents already living in sherwood west. You are proposing something that no one wants and no one needs. We love the farmland and agriculture of our area. New residents will be very upset by the air cannons that are used during harvest season to keep the birds away. So it is clear to me you don't live here and haven't visited here or you would know this.	8/16/2024 11:49 AM
74	Expansion is not only about creating jobs and financial gains for Sherwood. We need to think long term and how adding 4,500+ homes will impact the environment, traffic, and crime. Let's keep the "small town" charm of Sherwood. Do not expand the Urban Growth Boundary.	8/16/2024 7:48 AM
75	Vote this in and you get voted out. This is dumb. We don't need it and the people here don't want it.	8/14/2024 1:11 PM
76	Our taxes are already high and would increase more. Our schools are already understaffed. Farmland is disappearing.traffic is a nightmare. People working in Sherwood can’t afford to buy in Sherwood.	8/14/2024 6:30 AM
77	A 41% increase in the size of Sherwood. It is excessive, unnecessary, wasteful of rich farmland, will increase traffic congestion, and your property taxes.	8/14/2024 5:36 AM
78	I am 100% opposed to the extension of the urban growth boundary. Communities need to work together to address the growth issues. Just because Portland can’t manage their growth/population and drug crisis (that they created) doesn’t mean that this county should accommodate future growth. Stop the expansion to the west and make the current communities support their population	8/13/2024 10:10 PM
79	Expansion of the UGB to the sherwood west would be detrimental to forests, waterways, farmers and farmland. This concept plan runs within distance of wineries and MAJOR forests that literally help keep the area more natural. The carbon footprint of this many people would not be healthy and 99W including Roy Roger's and ELWERT cannot sustain this. Look at Wilsonville with Villebois and I5. The traffic will be horrid. We live in Sherwood because of the beauty, the farmland the wineries and the community. This community is SMALL for a reason and the people here like it this way. The back of Bull mountain is expanding rapidly and Roy Roger's cannot take all this traffic. Please reconsider because this will not be a beneficial choice for waterways, forests, animals, farmers, residents and the environment. Thankyou. Sherwood resident.	8/13/2024 9:04 PM
80	Consider how the farmers are going to be impacted and the small town, neighborhood feel that people in Sherwood take pride in as well as the heritage. Think about how the nature isn't going to become just miles of houses and industrial complexes	8/13/2024 8:03 PM
81	stay out of sherwood	8/13/2024 4:49 PM
82	traffic to/from sherwood from surrounding cities is already terrible and this will only get worse and add to that as well!	8/13/2024 3:33 PM
83	Do not expand the UGB	8/13/2024 2:00 PM

84	When will the Urban Growth boundary stop being extended? When is enough is enough? Do you want Sherwood to end up like Beaverton? What about food supply when farms keep vanishing into the boundary?	8/13/2024 1:00 PM
85	Just remember who or what is being affected by your decisions and how hard they are to take back.	8/12/2024 6:15 PM
86	The pendulum will eventually swing. Start expanding the UGB's before the voters turn on you (only a matter of time)	8/12/2024 5:35 PM
87	Bus and biking lanes where possible	8/12/2024 4:48 PM
88	Less people less traffic Less large shopping centers	8/12/2024 10:04 AM
89	I feel like the crime rate that is almost impossible to enforce right now needs to be considered. More people means more crime. And if we can't take care of the problems we have now then we shouldn't add to them. That's just basic common sense	8/12/2024 7:28 AM
90	Stop sprawl. We have a very fertile valley and need to grow food.	8/11/2024 10:50 PM
91	Please don't ruin the rural natural beauty of our community.	8/11/2024 8:17 PM
92	CLEAN HOMELESS CAMPS. LIMPIEN Y ERADICATE LOS CAMPOS DE HOMELESS. Es el mayor problema de vivienda en Metro Portland.	8/11/2024 2:36 PM
93	It's needed! We need more housing options for the growth of the town	8/11/2024 11:21 AM
94	Traffic. Safe walking paths	8/11/2024 10:33 AM
95	The only real long term fix to help reduce homelessness is the expansion of the UGB. When it comes down to it housing is a supply and demand issue. Government regulation and boundaries reduce the supply.	8/10/2024 11:51 AM
96	Do not expand the UBG	8/10/2024 10:41 AM
97	Not at this time.	8/10/2024 7:43 AM
98	Expand the urban growth boundary to allow more homes with yards. This high density pack them and stack them is ruining our livability. Roads are congested and it's UNREALISTIC to believe we will give up our cars.	8/9/2024 6:12 PM
99	Industrial land should have a 7% or less slope.	8/9/2024 5:54 PM
100	Respectfully request that Metro Council consider tabling the proposed Sherwood UGB expansion plan, and require the City to reconsider its explansion goals and desires and submit a revised plan after having more meaningful input and working partnerships with affected landowners living and/or working the land within their property.	8/9/2024 11:31 AM
101	Please don't do it, too many people at present is causing dangerous traffic situations. High speeds and too much congestion on country roads not built for this volume of traffic. Too many accidents have already occurred and if Metro does not take this into account Metro will be legally responsible for future accidents and needless deaths. Study the traffic on the surrounding country roads, you will find this to be true.	8/9/2024 7:04 AM
102	Please do not expand into the country. Getting closer to ny house every year.	8/8/2024 9:08 PM
103	Just say no	8/8/2024 7:50 PM
104	Sherwood is the last smaller scale town close to I5 and we do not have the capacity to grow anymore. Traffic is already awful and we don't have the space to expand any longer.	8/8/2024 2:00 PM
105	The urban reserves were so designated to account for urban growth boundary expansion in the region. Sherwood has completed a plan for one of those designated urban reserve areas, demonstrating how it could be developed and served with utilities and governance. Metro Council should approve the UGB expansion request, finding that Sherwood has met the requirements of the Metro Urban Growth Management Functional Plan and has put forth a plan to help provide needed jobs and housing to our region.	8/8/2024 1:13 PM
106	The more time these processes take and the more complicated and prescriptive the results are, directly relates to a higher cost of land and for meeting future housing demand and employment needs.	8/8/2024 12:08 PM

107	We have lived in Sherwood for 22 years. We will soon be in a home too large for us. We would like to stay in the community we helped build, but there are no single housing 55 and older neighborhoods, preferably gated. AND they will be small homes that most likely are unaffordable. Chew on that!	8/8/2024 11:48 AM
108	I have lived in Sherwood for almost 30 years. During that time it has blown up, we are losing the small town feel we used to have. Please help keep us from growing anymore west and explore other opportunities. Keep what little beautiful country we have left just how it is.	8/8/2024 11:47 AM
109	Please don't do it.	8/8/2024 11:28 AM
110	If possible slow the expansion down. With slowing population growth & other areas expanding, infrastructure that is inadequate, this should not go forth as is. We want to preserve an Oregon life style, not become California.	8/8/2024 11:10 AM
111	No	8/8/2024 10:50 AM
112	Added info in previous page	8/8/2024 9:43 AM
113	Do not do this to Sherwood!	8/8/2024 7:19 AM
114	My ask of the Council is quite simple. Follow the outlined legislation, purpose and protocol for 20 year outlook for UGB expansion requests, and Follow the Facts. The Sherwood West Concept Plan may appear to be an impressive package; however it represents the view of politicians and commercial developers and not a demonstrated need for more developable land.	8/7/2024 8:32 PM
115	Metro has the power to protect Oregon from urban sprawl. The plan does just the opposite of that and without data to support any demonstrated need or realistic achievable benefit.	8/7/2024 8:15 PM
116	do not allow sherwood to expand the ugb, there are many places already in the region that has opportunities for additional jobs and residential growth	8/7/2024 4:36 PM
117	I hope Roy Roger's Road does not get overwhelmed. I work in Elmonica and live in Wilsonville, and during the afternoon commute, it is faster than taking I-217.	8/3/2024 8:38 PM
118	See main essay on my criticisms, but otherwise I'll mention neighboring communities each had UGB expansions in the past cycle (King City out to Roy Roger's Rd, and Wilsonville with Frog Pond) that have not been developed yet, providing more area housing needs. In addition, a mid cycle swap in benefit of Tigard, taking acres from Damascus, adds additional housing land, making additional growth unnecessary.	8/3/2024 12:03 AM
119	There are zero amenities (stores, restaurants, gas stations, etc) in that part of town. Please make developers include those in their plans. I understand the land in this area is expensive, and the more houses they can squeeze into an area, the more profit they make, but it’s counterproductive to the sense of community that all these surveys speak so much about. Please don’t force an entire town’s with of new residents to drive to 99W/Sherwood Blvd or 99W/Roy Rogers for everything. Provide these basic services for these residents closer to their homes.	8/2/2024 3:27 PM
120	Although I think that Sherwood has the right mindset with keep the goals of the state in tact with the chip manufacturing, it seems like they are behind on timing. I feel like there are better areas with freeway access for transportation, if they build out the land off of Roy Rogers as employment/industrial it seems like there's limited future growth beyond this. I would recommend areas like Hillsboro, Tualatin, and Wilsonville. I think that was a bad planning part on Sherwood and the panels.	8/1/2024 12:39 PM
121	I did not answer about the Sherwood proposal as I am not in that area. However, I did indicate my overall preferences for what should be considered in UGB decisions.	7/30/2024 7:46 PM
122	There are a lot of small acreage lots with housing already on them and I would expect most of these lots would not be available for development for more than twenty years from now. There is also farming activities going on in the area, that do not appear to be available for development in the near future. There appears to be no real adequate plan for future transportation, water and sewer, and electricity, that will adequately serve the current area, let alone any future expansion.	7/30/2024 9:09 AM
123	The west side has such heavy traffic due to the extensive growth, I hope the new streets are accommodating of this reality.	7/30/2024 8:24 AM

124	Sherwood has a comprehensive plan and they know what is best for their city. Lattititide should be given to incorporate city objectives. There is too much top down planning.	7/30/2024 7:20 AM
125	Need to have Development Pay for itself. Putting new infrastructure on the backs of current residents is not acceptable. Develop and dash ,leaving "us" to pay for fire, police, schools, etc. part of the Development Ponzi scheme we are still buying into.	7/29/2024 9:42 AM
126	Let's not eat up more rural land unnecessarily. Instead, let's focus on greater density within the existing urban area.	7/28/2024 8:39 AM
127	Housing is unaffordable. Do not accept that the west coast needs to be expensive. We made it this way. We need a reset. We can and should set our goal to be more affordable than the Mid-West. Build more housing. All kinds of housing.	7/25/2024 7:25 PM
128	I'm strongly in favor of expanding the UGB as described in the Sherwood proposal. Long overdue!	7/24/2024 5:40 PM
129	Please look at the assertions of the City of Sherwood with a critical eye. Throughout the public outreach process they have often used vagueness and begged off serious concerns with a statement of it being to early in the process to make detailed plans.	7/24/2024 4:09 PM
130	Move to California if you want sprawl. Seriously, this is so irresponsible of you.	7/24/2024 7:36 AM
131	Our family has owned property in Sherwood for more than 100 years. We love the area and are thankful that METRO and the City of Sherwood planners are carefully considering options.	7/23/2024 9:29 PM
132	Denser	7/23/2024 8:58 PM
133	I have followed the preliminary work done by the city of Sherwood and believe they have captured the needs of the community and this expansion will make Sherwood stronger and provide more "Sherwood Quality" community around the High School and green land areas. Sherwood is unique and we'd like to see more people have the opportunity to be apart of this great community.	7/23/2024 8:41 PM
134	Just don't do it. I know there's a lot of pressure from developers and right-wing politicians to eliminate the UGB, but it has served us so well. Give the new middle housing and other infill opportunities a few years to show whether, as the growth projections suggest, they will provide adequate places to develop new housing that is more suited to achieving the region's climate and lifestyle goals.	7/23/2024 6:47 PM
135	Look forward. The future doesnt call for this	7/23/2024 6:25 PM
136	Stop it. Look at your own life	7/23/2024 3:29 PM
137	The several decades of suburban expansion since the Highway boom have definitively shown us that sprawl does not creat good communities, much of what made this region great and unique has been torn apart by Highway expansion and our main goal should be to fill the void left in its wake, expanding the growth boundaries would be contrary to that	7/23/2024 3:25 PM
138	If growth continues out in farm and agriculture areas, you will find one day there will no longer be berry picking, fresh eggs, pasture raised meat, flower farms and wineries, that people love to venture out to. You will also create a traffic nightmare by putting commuter roads where livestock live and tractors and other machinery will share those same roads.	7/23/2024 2:24 PM
139	The current untenable traffic problems. The adequate amount of buildable land within the current boundary. The financial interest in builders dominates the planning proposal, not the majority of citizens.	7/23/2024 12:17 PM
140	Please give credence to the comments of the public. Don't let the developers rule or community. They are here for the profit, we live here.	7/23/2024 11:53 AM
141	I would like to see more incentive provided for increasing transit options. Considering Sherwood's location within the Greater Portland Area, I imagine the increase in UGB will result in a increase in automobiles on the roads. Can there be a way to ensure an increase of transit options as part of the increase in UGB?	7/22/2024 6:10 AM
142	The area is losing residents. There's no reason to extend the growth boundary. Gentrify downtown. Leave the surrounding wilderness and farmlands alone. You're bought and sold by developers so I don't even know why I'm filling out this stupid thing.	7/21/2024 9:04 AM

143	I. The greatest asset to the Portland area has not been and will never be humans or anything made by man, but the natural bounty provided us all by the Earth. II. If we cannot live beautifully, why should we live at all?	7/20/2024 9:02 PM
144	Please never expand urban growth boundaries. Encourage density within existing urbanized footprints. Vastly expand public transit. Stop widening freeways. Fund housing as a human right.	7/20/2024 7:43 PM
145	Thank you for reaching out for opinions,	7/20/2024 10:44 AM
146	Make sure developers are legally on the hook to live up to their obligations instead of flaunting their disregard of the rules.	7/18/2024 9:47 PM
147	n/a	7/18/2024 12:06 PM
148	This proposal is the definition of car-dependent sprawl and should NOT be allowed.	7/18/2024 10:24 AM
149	We need more housing for seniors- single level, accessibility features.	7/18/2024 6:22 AM
150	Cycling, walking, and transit should not simply be options but the preferred mode of transportation around a new neighborhood such as this.	7/17/2024 6:53 PM
151	I hope you know how much of a transparent Money Grab this proposal is. Couched in disarming political jargon. The proposed expansion is in an area that struggles to support the residents as is. Highway 99 and 217 are virtual parking lots 80% of any day. Growth without sufficient infrastructure is irresponsible bordering on nefarious.	7/17/2024 6:18 PM
152	Unless the development pattern requires reuse and redevelopment of existing built areas first, while providing space for parks and natural areas, the expansion effort is based on false pretenses.	7/17/2024 2:26 PM
153	Stop building up over our beautiful land. This is the reason so many of us moved here.	7/17/2024 2:06 PM
154	We need more NW 23rds not more Lake Oswegos. If cities want to expand they need to do so in ways that allow for more mixed housing and not restrict the expansion area only for the wealthy.	7/17/2024 9:25 AM
155	I’m gonna be so real with yall. I come from Texas, and while they have a lot of draconian social laws, they know how to build housing — fast. Which is why housing costs are so cheap compared to here. While I don’t want 20 lane highways or single family suburbs everywhere, approving more land at a faster pace to build housing can change the game. Please approve the Sherwood proposal and continue expanding the boundary piece by piece.	7/16/2024 11:23 PM
156	I think it’s probably most important to consider the nearby communities and the transportation issues. I won’t be affected at all by this given where I live and I no longer own a car. Hopefully, adequate transit will be accessible to these new residents	7/16/2024 8:52 PM
157	Sherwood is a desirable city to live in because of its charm. This expansion would take away some of that charm and spread the city further apart instead of building it together creating more community	7/16/2024 8:51 PM
158	Does Metro conduct any evaluation (or require this of the applicant cities) to determine if this is the highest and best use of this area of the urban reserve, and/or whether there is not another place within the urban reserve that is better suited for an expanded UGB (even if it's in another city)? It seems misguided that cities apply for UGB expansion, instead of Metro determining where and when they should occur.	7/16/2024 8:43 PM
159	The roads that people will use to come and go from the new area. The roads already don’t support the population.	7/16/2024 6:32 PM
160	As a regional government, I believe that Metro Councilors have a responsibility to go out and talk to communities about the vision the Metro Council has for them and to listen to community feedback where they are. Decisions at Metro are made with City and County staff attendance in morning meetings, but they should attend evening meetings with Councils and Planning Commissions to hear the citizens sides of the stories, not at Metro. My opinion.	7/16/2024 5:01 PM
161	If you plan for decline you will likely achieve it.	7/16/2024 9:07 AM
162	Better increase of diversity at Metro in the team.	7/16/2024 8:01 AM
163	Just say NO, there is no reason for it. Approving this sprawl is not what METRO is supposed	7/15/2024 8:52 PM

	to be doing.	
164	Please clean up the trails at Mount Talbert Nature Park. So much poison oak and we need to do gymnastics to avoid it when hiking.	7/15/2024 7:57 PM
165	Sad to see our farm la d go to waste, we will never have that fertil land back ever again	7/15/2024 6:50 PM
166	I'm really proud of Metro and the UGB. Let's keep moving, and do it thoughtfully and slowly.	7/15/2024 6:48 PM
167	Make sure to preserve wildlife habitat and include good solar and other renewable energy options	7/15/2024 6:00 PM
168	Prioritize affordable single family housing and safe and affordable public transit.	7/15/2024 5:23 PM
169	More public transportation. More parks and trees!	7/15/2024 5:15 PM
170	I vote for no growth, Mother Nature thanks you	7/15/2024 4:41 PM
171	Please consider the desires of the people who call Sherwood home. You only need drive down Roy Rogers Road and see the abomination of development there to understand our intense contempt at the idea of those developers getting any closer to our bucolic countryside and beautiful rural setting. A 42% increase in the size of our city is unnecessary and unwarranted. Construction of this size will be a burden to all who live in the area for years to come.	7/15/2024 3:47 PM
172	Expand the boundary the maximum amount possible! The region needs more single family homes-thousands more homes!	7/15/2024 3:03 PM
173	Our land use laws have served us well, and has strong support. Going forward, we need to be flexible to address opportunities as they arise, and act far faster.	7/15/2024 2:20 PM
174	Again, don’t mix residential with working farm ground. Example, Roy Rogers Rd, one side now high density residential and the other ACTUAL working farm ground.	7/15/2024 1:39 PM
175	Thanks	7/15/2024 1:20 PM
176	Don't encourage expansion of the UGB under the disguise of affordable housing. In-fill and up zoning in close-in locales can solve the housing needs and address traffic and transportation issues. With all the expansion, where will we be in 20 or 40 years? Sprawl is not the answer no matter what it is called. Smart in-fill and upzoning development makes sense -- especially given the aging demographics. The new single-family neighborhoods will be empty areas in 30 years. Thank you.	7/15/2024 1:20 PM
177	Metro needs to remember that UGB amendments can't be undone, and that the UGB is about the only truly effective growth management tool in the US today. Consequently, what Metro does with the UGB is central to its success as a regional government. Metro needs to embrace this critical role and lead publicly to build understanding and support for probably the only thing that it does that has true and lasting value and impact. In addition, Metro needs to work with its jurisdictional partners to maintain, revise and needed, and publicize its vision for the region. Today, the 2040 Concept Plan is now 30 years old. Metro has ignored it's fundamental role as regional planner for way too long. That vision is out of date, unknown, and not authoritative. Metro has been given the opportunity to lead with vision, but it has insisted on doing nothing of the sort. For too long, Metro leaders have insisted that no more planning is necessary while ignoring the plans and vision that it has. Further, plans only represent the consensus of the moment they were adopted. Keeping plans and visions alive is an ongoing responsibility. It require work and commitment, and Metro has provided neither. If Metro doesn't want the UGB savaged by self-interested development forces, then it needs to frame the UGB by something larger. Metro has completely failed to do that, and the result is the kind of result we saw in the last Legislative session where Democrats, led by Governor Kotek, championed UGB amendment actions that would fundamentally make Metro, and this process, irrelevant. In addition, while Metro Councilors name-check climate as a major concern, they do nothing. They continue to push for highway expansions, and they have done nothing to update the 2040 concept to reflect concerns for climate and carbon emission reduction. Frankly, the emperor, in this case Metro, has no clothes. But Metro certainly like what it sees in the mirror. Please get real! Stop playing games with the region's future and get to work, particularly on the things Metro is uniquely charged with. Time is flying and you are not in the game.	7/15/2024 1:17 PM
178	I do not support this at all! Fix downtown Portland first!	7/15/2024 1:15 PM
179	No more concrete jungle. The traffic is HORRENDOUS around here. Too many cars and new	7/15/2024 12:50 PM

	crappy homes.	
180	Wilderness spaces are important for so many reasons, especially as climate change will be making urban life even more warm and unbearable in the future. I'd rather see Metro use the space already allotted to it than paving over even more land.	7/15/2024 12:44 PM
181	Fewer parking lots, less sprawl, more dense housing, narrow freeways and add tolls, more bike paths	7/15/2024 10:36 AM
182	Quit allowing land waste with huge estates. Focus on density and cleaned up safe transit and bike paths.	7/15/2024 7:31 AM
183	No	7/15/2024 6:09 AM
184	Please don't expand. The city has plenty of room for development inside city limits. In addition king city has already expanded and is working on developing a large residential area just down the road.	7/14/2024 6:17 PM
185	Thanks for asking	7/14/2024 5:42 PM
186	Approve it	7/14/2024 5:16 PM
187	Don't let existing Sherwood residents vote down UGB expansions that are needed to help the region accommodate growth and affordability.	7/14/2024 4:02 PM
188	Just like with the Brookman Rd expansion I believe the council will push this through, regardless of your employers, the voters.	7/14/2024 3:43 PM
189	Prefer to not include Sherwood in the urban growth areas.	7/14/2024 3:30 PM
190	Please do not approve the Sherwood West Plan.	7/14/2024 2:25 PM
191	Light rail expansion on the 99 corridor	7/14/2024 12:48 PM
192	I reject the proposal. I think it’s important to keep farmlands and keep this city a somewhat “country” suburb. Tigard and tualatin are close enough and are incredibly overdeveloped. We don’t want Sherwood so overdeveloped. No one moved to Sherwood wanting it to end up like Tigard or tualatin.	7/14/2024 12:16 PM
193	This is not the right thing to do. When this was first proposed in 2015 it was a 50 year plan. Here we are 9 years later and they are moving forward full speed. We all were against this in 2015 and we still continue to be apposed now. Do not allow the sheriff expansion. With the expansion of King City it's already going to bring a huge influx of people, cars and business to this Sherwood area. We don't need more. We need land to grow food. We need trees. We need space for wild animals. This can not happen. As rural residents of Sherwood we can't vote on elected officials that make the choices that effect us and not those in town who do get to vote. Please let our voices be heard. We do not support this expansion. This is the only way we can be heard.	7/14/2024 12:09 PM
194	Do not expand Sherwood’s urban growth boundary	7/14/2024 10:52 AM
195	The city of Sherwood residents voted a resounding NO for expansion - 86% rejected this expansion plan. We are not willing to fund such expansion when we already added land into the UGB an poor planning as led to a waste of resources and ag land (massive high school that tax payers are having to pay for)	7/14/2024 10:32 AM
196	Resources are already scarce in rural Sherwood. Please don’t exacerbate that.	7/14/2024 10:29 AM
197	No more growth in Sherwood. We are being squeezed.	7/14/2024 10:16 AM
198	Metro should consider the city of Sherwood’s blatant rejection of the wants and needs of its residents and bordering residents. We have demonstrated over and over to the city and metro, that this expansion is both unneeded and unwanted. Much of developed Land within city limits sits vacant, neglected, and unused. Metro And the city of Sherwood should be protecting precious farm and agriculture space, rather than promoting urban sprawl. Please reject this proposal.	7/14/2024 10:14 AM
199	Schools cannot take any more students. Please consider grocery shops being better accessible. Growth isn’t always best.	7/14/2024 9:47 AM
200	Less low density housing. And how will Trimet serve this area?	7/14/2024 9:30 AM

201	For the love of god please get housing prices under control!	7/14/2024 8:21 AM
202	There needs to be infrastructure already IN PLACE before you expand. The 2020 bald peak fires are an excellent example of why we need to be prepared BEFORE you expand. This one incident required the involvement of many multi agencies and could have resulted in a much larger devastation and loss of forest, wildlife, domestic/farm animal life and human life if the plane dropping fire retardant wasn't diverted from Hagg Lake fire to Bald Peak.	7/14/2024 8:13 AM
203	Increase density and transit, anticipating future climate refugees.	7/14/2024 12:11 AM
204	The city has a lot of un unused or poorly used areas and they can be transformed to a better place like broadway corridor that solely adds over 1000 homes. This type of development should be a focus of the council.	7/13/2024 12:02 AM
205	Rather than building more outside of the UGB, let's focus on creating better spaces on the land that's already allocated. Densify current areas, we don't need to increase sprawl more.	7/12/2024 8:21 PM
206	Please consider the climate and the environment and understand that gasoline cars and infrastructure that prioritizes cars is killing us in heat waves. Please consider these very serious factors and look at Europe and Asia.	7/12/2024 6:16 PM
207	This expansion should have already happened before the School was built in 2015 - Newberg, Or has updated their area and we are left behind and deal with their traffic to Hillsboro.	7/12/2024 1:24 PM
208	Sherwood has the right ideas in mind with mixed developments and alternative transportation but they need to take them further, transit being extended into Sherwood west should also be explored as it's distance from the other bus lines would make access difficult and in the largest proposed area of lower cost housing in Sherwood those living in Sherwood west may be those most dependent on transit	7/12/2024 8:12 AM
209	I can't stress enough how important it is to preserve nature and avoid suburbs.	7/12/2024 8:04 AM
210	Future mass transit expansions, leave room in regional plan to allow for cheaper future expansions.	7/12/2024 12:26 AM
211	Preserve natural lands at all costs. Build up, not out. Increase density, disincentivize personal automobile ownership & provide clean, renewable public transit. Smaller urban boundaries increase access to nature for all, decrease fossil fuel emissions and preserves ecosystems. The Pacific Northwest is supposed to be a bastion of sustainability, let's live up to it.	7/11/2024 10:39 PM
212	I grew up in both Newberg and Tigard (divorced parents). I saw Sherwood go from some fields to what it is today. It sprawls a lot more than it needs too, and driving to there and through it is miserable. I'm nervous about continuing to focus on roads instead of public transit, and if we want housing to be affordable and Sherwood to be accessible to folks, it needs to move away from single family homes. Thank you	7/11/2024 7:03 PM
213	You really messed up in expanding Happy Valley without planning to run high capacity transit to serve it. You doubled down on this error by trying to run an expressway to serve the area, instead of transit. Now, you're on course to repeat your mistakes in Sherwood. Are you stupid, or just corrupt? Don't do it. Stop yourselves before you offend again.	7/11/2024 6:16 PM
214	Do not expand the UGB. No more freeways. No car dependence.	7/10/2024 10:17 PM
215	Please do what you can to encourage mixed-use transit-oriented density throughout the metro region, thanks.	7/10/2024 12:38 PM
216	Please don't expand the urban growth boundary in Sherwood. Our town has reached its limits.	7/9/2024 9:57 PM
217	Yes! The greatest consideration should be given to the plan and proposals from the local community.	7/9/2024 3:51 PM
218	no	7/9/2024 3:20 PM

Q1 What do you most want to see preserved as greater Portland continues to grow?

Answered: 340 Skipped: 25

#	RESPONSES	DATE
1	Portland and Oregon needs to keep our lands preserved, the farmland, the natural areas, and the like. There's been far too much expansion, with virtually no consideration to infrastructure. It's become so bad that I will likely move out of Oregon as the traffic is untenable. Areas like Bull Mountain and the expansion west into the Scholls area are disheartening and honestly depressing to witness. As someone who moved from Tigard to Sherwood to escape the rampant influx and horrendous planning, I'm fearful of what your plan is for Sherwood and beyond.	8/23/2024 10:06 AM
2	Parks and rec area	8/22/2024 9:51 PM
3	Farmland and rural areas	8/22/2024 9:44 PM
4	I most want to see our green spaces and parks preserved, ensuring that all generations can enjoy the natural beauty and outdoor opportunities that make Portland unique.	8/22/2024 9:42 PM
5	Farmland	8/22/2024 9:38 PM
6	Farm land	8/22/2024 7:24 PM
7	Our agricultural land!	8/22/2024 6:57 PM
8	Open space, farm land, landscape views	8/22/2024 6:51 PM
9	Mass transit	8/22/2024 6:46 PM
10	Farm land	8/22/2024 6:44 PM
11	Farm land, country roads, small town feel, less traffic,	8/22/2024 6:29 PM
12	Farmlands and fields	8/22/2024 6:28 PM
13	Partnerships across different levels of government, the private sector, and non-profit organizations.	8/22/2024 6:06 PM
14	Farmland	8/22/2024 4:57 PM
15	The Old Growth Timber 200 year plus trees	8/22/2024 4:38 PM
16	Ag land.	8/22/2024 1:13 PM
17	Farmland	8/22/2024 11:42 AM
18	Compact city (easy and quick to get from one side of the city to the other). Preservation of nature outside the city. Close proximity to nature.	8/22/2024 11:39 AM
19	I would like to see farmland and trees preserved. Everytime a developer comes in and develops land into $700K homes (not affordable to true Oregonians only california transplants) he cuts down 100's of large mature trees and plants one the size of a charlie brown christmas tree and calls it good	8/22/2024 10:11 AM
20	Our natural and rural areas.	8/22/2024 10:08 AM
21	Farmland and forest	8/22/2024 2:52 AM
22	Habitat for wildlife	8/21/2024 11:09 PM
23	As Portland grows I would like to see the beauty and charm of existing neighborhoods protected. Too often decisions are made which prioritize currently popular political priorities which end up trampling over the livability of existing neighborhoods.	8/21/2024 10:52 PM

24	Farmland, access to nature, a relatively compact city, lack of suburban sprawl, relatively low traffic congestion.	8/21/2024 10:47 PM
25	Tress and water quality	8/21/2024 9:32 PM
26	affordability	8/21/2024 8:16 PM
27	The natural beauty of Oregon should be preserved. It is also important to preserve wildlife habitat and local agriculture. Given global climate change Oregon wine country is anticipated to have large growth in industry in the upcoming future. Preserving land where this local agricultural can flourish is imperative. Protecting the water shed is also important, given the many threatened species that live in the surrounding area.	8/21/2024 6:06 PM
28	Farmlands and natural areas	8/21/2024 5:50 PM
29	The natural lands surrounding the city.	8/21/2024 4:55 PM
30	Livability. This includes affordability, connection to nature and lack of traffic congestion.	8/21/2024 4:22 PM
31	Livability and agriculture. The urban growth boundary is designed to protect farm land and preserve the livability of our state and it should be allowed to work as intended.	8/21/2024 3:40 PM
32	Continue to protect green spaces and saving older homes instead of developers coming in and bulldozing them down. incorporate more of these in newer developments. Seeing the high-density houses go in with little to no regard for trees, green space is making our area look every other area in the country instead of preserving the history and natural beauty of our state.	8/21/2024 2:58 PM
33	Preserve green spaces, prevent sprawl, increase density	8/21/2024 2:35 PM
34	1: Free Choice of how to pursue happiness, including where to live. 2: Rural acreage close to, and within greater Portland, that protects both natural and economic characteristics.	8/21/2024 10:54 AM
35	farm lands and wildlife.	8/21/2024 8:33 AM
36	Farm land	8/21/2024 7:10 AM
37	A good quality of life. Enough schools and jobs and roads to support the number of new homes being built. And preservation of the natural landscape.	8/20/2024 11:35 PM
38	Public green space Pedestrian and bike friendly community centers	8/20/2024 7:43 PM
39	Parks. Concerts, high quality establishments	8/20/2024 6:24 PM
40	Farmland and green spaces	8/20/2024 6:21 PM
41	I want to see farmland and natural areas continue to be preserved.	8/20/2024 6:19 PM
42	Green spaces, protected habitat areas	8/20/2024 5:00 PM
43	farm and forest land	8/20/2024 4:55 PM
44	Rural farmlands	8/20/2024 4:53 PM
45	Larger lot sizes	8/20/2024 4:49 PM
46	wildlife habitat, farmlands.	8/20/2024 4:48 PM
47	Farmland, green space, horizon lines.	8/20/2024 4:25 PM
48	Farm land and outdoor spaces	8/20/2024 4:20 PM
49	Productive farmland	8/20/2024 4:18 PM
50	PRESERVE Farmland, more density housing in areas already in the UGB, not increasing growth being driven by developers but SMART GROWTH	8/20/2024 4:10 PM
51	Protection of Title 13 areas in the form of small tree farms and woodlots where wildlife has take refuge, including creeks and wetlands.	8/20/2024 4:03 PM
52	Farm Land, open space, environmentally sensitive Areas	8/20/2024 3:52 PM
53	farmland, wild animal habitat, forests	8/20/2024 3:52 PM

54	Farmland, wineries, forests and parks	8/20/2024 3:46 PM
55	Green Space	8/20/2024 3:46 PM
56	Substantial wetlands & navigable water ways	8/20/2024 3:31 PM
57	Preservation of agricultural land and open space. The loss of agricultural land is disproportionate to the need for growth and expansion with industry. The focus should turn to using already developed urban land before expanding into precious agricultural areas.	8/20/2024 2:53 PM
58	Quality of life	8/20/2024 2:01 PM
59	Greenspace	8/20/2024 1:47 PM
60	Our farms, vineyards, our trees and affordable housing.	8/20/2024 10:54 AM
61	Green space and open land (used as natural reserves and agricultural areas)	8/20/2024 9:44 AM
62	Rail transit rights of way	8/19/2024 6:09 PM
63	farmland and country acreage preserved	8/19/2024 12:45 PM
64	Preserved nature, less sprawl	8/18/2024 11:22 PM
65	The current urban growth boundary boundary	8/18/2024 10:17 PM
66	Agriculture land.	8/18/2024 9:24 PM
67	Agricultural resources, our natural spaces, and our planet. Sprawl consumes more farm land, more natural habitats, and creates exponentially more GHG emissions which will destroy our planet.	8/18/2024 8:37 PM
68	Natural spaces	8/18/2024 8:30 PM
69	Slow it down, big housing developments with out the infrastructure is horrible. Take for instance, the high school the walk way across 99 3 years after the school opens. Someone had to get hurt before they did something . Now it’s just a cluster, and drop off one way in , one way out. I’m sick of the lack of common sense that goes into planning.	8/18/2024 7:01 PM
70	Farm land and green spaces near our urban centers.	8/18/2024 5:10 PM
71	Our green space and lack of sprawl. Part of what makes this area great is the density and strong urban growth boundaries that created the cities in the Portland area.	8/18/2024 3:42 PM
72	Keeping Sherwood a small town, single family homes and not apartments and condos.	8/18/2024 3:25 PM
73	Natural and agricultural land.	8/18/2024 2:37 PM
74	Farmland, keep the UGB in tact.	8/18/2024 2:25 PM
75	Our lush green spaces and forests	8/18/2024 2:25 PM
76	Keep the current UGB and grow through infill housing	8/18/2024 1:35 PM
77	Farmland & trees.	8/18/2024 1:21 PM
78	Honestly, as someone who has lived in Sherwood for 15 years, calling it part of "greater Portland" in the first place is offensive and concerning. What I want to see preserved for *Sherwood* is that the small town and surrounding farmland does not get sucked into the crime, homelessness, drug use, and other blight infecting Portland proper.	8/18/2024 1:20 PM
79	The existing UGB.	8/18/2024 1:11 PM
80	Nature and valuable farmland	8/18/2024 12:49 PM
81	Farmland - use the old and empty buildings before allowing to build more.	8/18/2024 12:29 PM
82	Farmland and forest.	8/18/2024 11:27 AM
83	Farm land	8/18/2024 10:00 AM
84	Farm land and better infrastructure to handle the growth, BEFORE you grow anymore!	8/18/2024 9:40 AM
85	Farms, woodland areas, and small town atmosphere.	8/18/2024 7:48 AM

86	Rural farm land	8/18/2024 7:19 AM
87	Agriculture, farmland, forestry. Repurpose or demo existing old buildings and land that is wasted within the current boundaries.	8/18/2024 7:08 AM
88	Parks, farms, Open space	8/18/2024 6:28 AM
89	Nature, trees, fields	8/18/2024 1:08 AM
90	farmland	8/17/2024 8:46 PM
91	Affordable housing and access to parks, state parks, green areas, etc	8/17/2024 2:48 PM
92	I value the variety of outdoor activities.	8/17/2024 9:10 AM
93	Farmland and forest	8/17/2024 8:27 AM
94	Farmland	8/17/2024 8:02 AM
95	Keeping urban sprawl limited, maintaining natural lands especially wetlands and wild habitat.	8/17/2024 5:18 AM
96	Forest and farm land	8/16/2024 11:03 PM
97	We need more space. We are ruining life for the majority in order to appease the few, often very wealthy. UGB is not a great thing.	8/16/2024 9:55 PM
98	Rural spaces and limiting growth of surrounding cities	8/16/2024 9:31 PM
99	Quality of life and open spaces. Putting high density homes in areas without transportation options will lead to excessive congestion.	8/16/2024 4:23 PM
100	Safe, clean and robust communities living in harmony with open protected spaces	8/16/2024 4:23 PM
101	Agricultural land that makes the area what it is. No more packed together houses with no character.	8/16/2024 11:44 AM
102	farmland, natural spaces, lower traffic	8/16/2024 7:35 AM
103	Water & air quality.	8/15/2024 1:41 PM
104	Green space…parks…small produce farms	8/15/2024 12:15 PM
105	Farmland and scenic beauty	8/14/2024 1:08 PM
106	Fertile Farmland, natural habitats and forests.	8/14/2024 7:01 AM
107	Farmland, which is why I bought in Sherwood 20 years ago	8/14/2024 6:25 AM
108	Farmland	8/14/2024 5:31 AM
109	I would like to see farmland and the farming communities around Portland continue to thrive. Adding additional sprawl will not allow Oregonians to continue to thrive as ranchers, farmers and country folk. It changes the landscape and ruins what makes Oregon great.	8/13/2024 10:06 PM
110	WINERIES , AND FARMLAND IN SHERWOOD OREGON.	8/13/2024 8:58 PM
111	Our green spaces are quickly disappearing and being replaced by industrial buildings and high density houses. It is having an impact on different industries, air quality, congestion and more. We are building faster than we are growing trees and it is sad to see. Oregon is beautiful because so much of nature has been protected, at least until recent years.	8/13/2024 7:54 PM
112	farmland	8/13/2024 4:45 PM
113	Family farms	8/13/2024 4:06 PM
114	Sherwood and surrounding farm land areas so that there is retained access to local fresh farm products.	8/13/2024 3:46 PM
115	rural areas, farms, wineries, parks, natural areas	8/13/2024 3:29 PM
116	Less density in building. More single family homes instead of apartments.	8/13/2024 1:58 PM
117	Old growth tall trees, all greenways, wetlands, natural habitat, waterways, farmland, open fields.	8/13/2024 12:55 PM

118	Land as mark twain said " buy land they aren't making it anymore" Meaning it's hard to get back the land that is absolutely needed for farmers who have a hard time as it is to grow food for our community and wildlife plus the more homes the more pavement ie more heat and less country.	8/12/2024 6:13 PM
119	Livable neighborhoods with yards.	8/12/2024 5:29 PM
120	old trees, convenient public transit	8/12/2024 4:56 PM
121	Parks, recreation, libraries, and open spaces and agricultural land free from future development	8/12/2024 4:44 PM
122	Less people less traffic	8/12/2024 10:01 AM
123	I want to see land, farms, and agriculture preserved	8/12/2024 7:23 AM
124	Condense cities save farm land, Forrest and open spaces	8/11/2024 10:45 PM
125	Farmland and wilderness areas - please protect Oregon agriculture	8/11/2024 8:32 PM
126	Preserve green spaces in Sherwood. Oregon’s public perception is lush greenery, and yet everywhere I look in my community the green is systematically removed. It’s ugly and heartbreaking.	8/11/2024 8:15 PM
127	Árboles, parques zonas verdes. Tree, nature rich parks, more trees.	8/11/2024 2:32 PM
128	Farmland, rural spaces, forests	8/11/2024 10:27 AM
129	The availability of single family detached homes to a wide range of homeowners. Surveys continue to say young people still desire home ownership and the changing needs of baby boomers are not being met.	8/11/2024 8:18 AM
130	Our farm land! I have lived here all my life (57 years) it truly makes me sad to see Metro being hijacked by developers. The idea of the urban growth boundary was a great vision to keep urban sprawl from ruining our way of life the way it has in so many large cities, but I have seen over the years that the Urban Growth Boundary has increasingly meant nothing. Constantly building is not sustainable. We need to revisit, at the deepest level, why the Urban Growth Boundary was created in the first place and go back to the time when it meant something. When it was used as a tool to continue a high quality of life.	8/10/2024 6:05 PM
131	I would like to see the cost of housing preserved over all other things.	8/10/2024 11:46 AM
132	Protect Farm land	8/10/2024 10:36 AM
133	Agricultural and forest land	8/10/2024 9:58 AM
134	Farm land It is very sad to see so much farm land get swallowed up by large housing developments, and now on Roy Rogers Rd. businesses are taking over farm land.	8/10/2024 7:37 AM
135	Greenspace, single family home neighborhoods, safe parks.	8/9/2024 11:15 PM
136	Single family homes with actual yards	8/9/2024 6:07 PM
137	single family homes	8/9/2024 5:50 PM
138	Open spaces, small farms, and rural lifestyle within the Sherwood UGB area. While growth is necessary to address future needs it must be done smartly and prudently considering all factors and concerns particularly from those directly affected by proposed changes .	8/9/2024 11:13 AM
139	Natural spaces without residential expansion and subdivision creation.	8/9/2024 9:51 AM
140	Natural habitats, green spaces/bridges, farmland, more density less urban sprawl.	8/9/2024 9:32 AM
141	Rural and precious farm land, forest, timber and green spaces including waterways.	8/9/2024 6:58 AM
142	Our roads being somewhat managable with traffic. As a 5th generation oregonian with a 6th gen daughter. The traffic is getting horible.	8/8/2024 9:04 PM
143	Stop building everywhere. Save the trees for weather preservations in the heat. More trees more rain, win win, end the drought. Save wildlife.	8/8/2024 8:18 PM
144	Farmland	8/8/2024 7:45 PM

145	Farm land, forests, and welands	8/8/2024 7:45 PM
146	Forests, wildlife, farmland	8/8/2024 7:28 PM
147	Farmland	8/8/2024 7:19 PM
148	Farmland, wildlife areas, green space	8/8/2024 7:05 PM
149	Farmland. No concrete jungles or suburban sprawl like California	8/8/2024 6:28 PM
150	Keep land as is. No more commercial building	8/8/2024 6:24 PM
151	Trees' and open spaces.	8/8/2024 5:38 PM
152	open farm land and large open spaces for trees and parks	8/8/2024 3:43 PM
153	Farmland and small family run farms	8/8/2024 1:58 PM
154	I'm not sure about preserved per se, but funding provided for parks and trails should be prioritized to maintain green spaces and multimodal transportation options.	8/8/2024 1:04 PM
155	Suitable land prepared for residential, commercial, and industrial use inside the urban area with fewer governmental barriers	8/8/2024 12:02 PM
156	Small town feel	8/8/2024 11:42 AM
157	Land and small town feels	8/8/2024 11:42 AM
158	We need to preserve the quality of life that Portland is known for. Outdoor beauty, healthy local economies, environmental quality.	8/8/2024 11:25 AM
159	Farm lands, green forested areas. Not urban sprawl or mini malls	8/8/2024 11:04 AM
160	Farms	8/8/2024 10:47 AM
161	Open space	8/8/2024 10:12 AM
162	Preserve farmland, do not increase traffic on already broken road infrastructure	8/8/2024 9:54 AM
163	Family farms and farm and forest land	8/8/2024 9:42 AM
164	Open spaces, wildlife preservation	8/8/2024 9:37 AM
165	The love the great non developed area we live in. Metro continues to invade our small country feel. We don’t need more bullying that Metro brings to the table.	8/8/2024 8:49 AM
166	Out beautiful trees and open spaces without city sprawl and tight housing	8/8/2024 7:14 AM
167	Trees, farms, natural beauty, clean air, TRAFFIC CONTROL	8/7/2024 11:21 PM
168	Access to green spaces, forests, natural areas	8/7/2024 8:39 PM
169	Farmlands, open spaces, parks	8/7/2024 8:21 PM
170	trees, nature, farms, agriculture, clean air, no pollution, protect environment	8/7/2024 7:57 PM
171	affordable housing, jobs, community safety, people of color in charge of decisions	8/7/2024 4:34 PM
172	Homes less than 500k with yards greater than 5,000 square feet. I like to garden, but I am not wealthy.	8/3/2024 8:26 PM
173	Strip clubs, porn theaters, a verity of convenience stores	8/3/2024 3:14 PM
174	The rights of farmers & their families, farmland, native plants & trees & wildlife including the protected nesting areas, hunting grounds & migratory routes including aerially. Once forest, farm rural land is paved it can never be restored. There's plenty of opportunities to convert un-used, partially or under-used land, buildings, homes within the UGB to better, more efficiently & effectively house people to be close to jobs, social services & stores & medical services without permanently destroying, compromising & polluting protected, finite and rich 'world class' soil, land or water. Also, with being resourceful, creative & utilizing recently passed regulation, it's possible to prevent the destruction of protected wildlife, native plants & essential tree canopies & conserve the history, beauty, rich soil, farmland, nature & topography of Oregon.	8/3/2024 12:50 PM

175	Natural areas, specifically varied wetlands.	8/2/2024 11:42 PM
176	Existing areas of non-residential community spaces, e.g. restaurants, shops, meeting spaces, gardens, etc., that are a reasonable walking/biking distance from homes	8/2/2024 3:13 PM
177	Parks and trails for the community	8/1/2024 12:31 PM
178	Farm land	7/31/2024 11:31 AM
179	Bigger natural landmarks such as lakes, river beds, and heavily, dense, forested areas far outside the current developments	7/31/2024 8:37 AM
180	Continued preservation of natural spaces such as Metro has been doing.	7/30/2024 7:44 PM
181	nature, forests	7/30/2024 2:53 PM
182	The livability of the area. Which would not include expanding the area without an adequate transportation system. Travel times on I-5 and 99W that include Sherwood have almost doubled in the last 20 years.	7/30/2024 8:55 AM
183	It is sad to see all the apartment buildings being constructed with little or no greenspace planned into the designs. People living in apartments need nature too!	7/30/2024 8:22 AM
184	character in neighborhoods and diverse housing options	7/30/2024 7:14 AM
185	Accessible commercial and residential spaces for people with mobility issues. Affordable housing. More public trash cans. More parking.	7/29/2024 11:37 PM
186	Areas con naturaleza,transportación pública.	7/29/2024 7:21 PM
187	Access to natural areas, close to the city. Green space amidst population growth.	7/29/2024 11:48 AM
188	Stafford Area- A regional Climate Action Plan should be developed. Area is surrounded by 4 of the top 5 greenhouse gas emitters in the region. Stafford is the "ONLY" open space area that would be a GREAT carbon sequestration sink. Council are on board with this.	7/29/2024 9:35 AM
189	green spaces, old growth trees, wildlife habitat, peaceful surroundings	7/29/2024 7:48 AM
190	NO SPRAWL, MORE DENSITY	7/28/2024 12:50 PM
191	Rural areas outside the urban growth boundary. Walkable/bikable neighborhoods within the urban area.	7/28/2024 8:34 AM
192	Natural áreas, forest, farmlands	7/28/2024 8:26 AM
193	I want to be able to leave the metro with a short 20 minute drive. I don't want so much congestion that I cannot leave the city/suburbs in a reasonable amount of time.	7/25/2024 7:17 PM
194	Strong neighborhoods, nice parks for recreation	7/24/2024 5:33 PM
195	Wise planning for growth, taking into consideration needs and protecting farm land and natural resources.	7/24/2024 3:55 PM
196	The opportunity to produce housing as inexpensively as possible to keep housing affordable for all regional residents.	7/24/2024 11:56 AM
197	Our current UGB. Enough sprawl. I left San Diego 16 years ago because sprawl ruined California. Let's not repeat that mistake here.	7/24/2024 7:32 AM
198	Forest/habitat for animals	7/24/2024 12:10 AM
199	Good jobs, all kinds of housing options that are attractive and safe, parks, agriculture and businesses to employ people so that we can manufacture top-notch goods in Oregon.	7/23/2024 9:20 PM
200	Denser development	7/23/2024 8:54 PM
201	Create access to good housing in good neighborhoods. Overall preserving existing neighborhood communities and enabling good communities for the future.	7/23/2024 8:30 PM
202	I want to preserve our region's phenomenally productive farm and forest land, which we have tragically failed to do in the face of exclusionary, detached single family home mandates, particularly though not exclusively in suburban areas.	7/23/2024 6:39 PM

203	Vacant land	7/23/2024 6:19 PM
204	Property rights and value	7/23/2024 3:19 PM
205	The historic human scale neighborhoods left from the old streetcar network, small city blocks, mixed use and multi family housing	7/23/2024 3:14 PM
206	Low traffic around Farm/Agriculture areas, due to animals, crops and machinery.	7/23/2024 2:12 PM
207	agricultural land and nature habitat	7/23/2024 12:06 PM
208	Farmland. We need LOCAL food sources.	7/23/2024 11:17 AM
209	Farmland and rural areas at risk of development	7/23/2024 2:36 AM
210	Environment especially our tree canopy	7/22/2024 3:06 PM
211	I want to see med-high density housing to be prioritized over single family lots	7/22/2024 6:07 AM
212	Natural beauty	7/21/2024 12:16 PM
213	Wildlife habitat	7/21/2024 10:35 AM
214	Green space	7/21/2024 9:49 AM
215	The area is losing residents. There's no reason to extend the growth boundary.	7/21/2024 9:00 AM
216	Urban growth boundaries	7/20/2024 9:12 PM
217	The forests and natural ecosystems	7/20/2024 8:57 PM
218	Our urban growth boundaries should be permanently locked in place. Any growth should occur in existing urbanized land; in other words, densify, densify, densify.	7/20/2024 7:38 PM
219	Public spaces	7/20/2024 10:41 AM
220	I want to continue to see communities that provide great access to natural areas, preferably within a short walk or bike ride for most residents. I think our parks are some of our most valuable resources and they contribute so much to the health of the community.	7/20/2024 9:28 AM
221	Park land and the proximity to natural spaces (farms, forests, etc).	7/20/2024 7:41 AM
222	As much uninhabited natural habitat as possible. Including undeveloped riverfronts and other areas adjacent to waterways. Bring back the wetlands of Portland.	7/20/2024 12:38 AM
223	Natural/green spaces.	7/19/2024 4:15 PM
224	The ability to escape the urban and suburban area in a short distance.	7/19/2024 2:06 PM
225	Washington Park, Forest Park, alongside all of our other parks in Portland.	7/19/2024 12:40 PM
226	Agricultural land should not be re-zoned without the owner paying the net back taxes instead of receiving a windfall.	7/18/2024 9:44 PM
227	Green spaces.	7/18/2024 12:03 PM
228	Farm & forest. No expansion to the UGB.	7/18/2024 10:20 AM
229	Tree canopy, green spaces, floodplains. Tree canopy is the most important.	7/18/2024 6:16 AM
230	Rivers and streams, watersheds, and walking paths that provide access for all	7/17/2024 11:12 PM
231	Green space , fields, undeveloped land!!	7/17/2024 6:04 PM
232	Wetlands, riparian areas, forest tracts	7/17/2024 2:18 PM
233	Our land	7/17/2024 2:00 PM
234	Portland's commitment to creating dense, efficient, and affordable housing where people want to live.	7/17/2024 9:20 AM
235	nature	7/17/2024 1:16 AM
236	Farmland when possible	7/16/2024 11:18 PM

237	Farm and forest areas	7/16/2024 8:46 PM
238	The core downtown businesses and restaurants as well as the neighborhood restaurants and small businesses	7/16/2024 8:44 PM
239	Protect farms, forest, rural areas, quality of life, and our smaller urban footprint	7/16/2024 8:26 PM
240	Green spaces	7/16/2024 6:51 PM
241	Trees and natural spaces	7/16/2024 6:26 PM
242	Natural areas of forest, marshes, and waterways that help absorb lower the intense heat of summer and absorb the extreme rain events we have been experiencing.	7/16/2024 5:52 PM
243	Open spaces, green space.... Just because people want to move here does not mean we need provide it	7/16/2024 12:20 PM
244	Housing Variety and natural resources.	7/16/2024 10:24 AM
245	Police presence/relationships with all community members to keep our city safe	7/16/2024 8:09 AM
246	Parks and Trails	7/16/2024 8:00 AM
247	Low cost homes	7/15/2024 10:34 PM
248	Portland isn't necessarily growing. The growth assumption relies on more in-migration than out-migration, not the case recently. Portland needs to contain and preserve METRO borders. Do not build on more farmland just because it is easy. Re-develop, re-purpose, re-use existing real estate...land and buildings.	7/15/2024 8:39 PM
249	As much forest and wetlands as possible.	7/15/2024 7:50 PM
250	Space for wildlife: safe places for birds, forested areas, wetland, river access, etc. I hate watching wildlife be killed or relocated because we don’t leave them space in our communities to live.	7/15/2024 7:17 PM
251	Our small cities and metro to be dissolved	7/15/2024 6:47 PM
252	Portland is a city of neighborhoods - I want that amazing diversity and sense of wonder (one experiences) kept (not preserved - like jam) and CELEBRATED!	7/15/2024 6:41 PM
253	Open spaces, the integrity of old neighborhoods- historic ones in particular, balance of low income to market rate to high end market rate- in other words a balance that includes all demographics, easily walkable and access to shops, schools, work, safety, safe and beautiful public spaces	7/15/2024 5:54 PM
254	Housing affordability and a strong economy	7/15/2024 5:28 PM
255	Habitat and habitat connectivity... keeping the 30 by 30 vision in mind (conserving 30% of the land by 2030)	7/15/2024 5:22 PM
256	Affordable single family housing	7/15/2024 5:19 PM
257	Forest. More TREES!!	7/15/2024 5:12 PM
258	Save the old historic houses	7/15/2024 4:37 PM
259	Safe cities, funded schools, managed traffic flow	7/15/2024 4:03 PM
260	Open spaces, farmland, winery areas, forested areas	7/15/2024 3:31 PM
261	The small town feel of my City (Tigard). I want to preserve the LACK OF homeless camps taking over our streets, parks and public spaces. I want to preserve the conservative values of neighborhoods, family and community vs. ushering in progressive and liberal ideologies.	7/15/2024 3:25 PM
262	Existing oatks	7/15/2024 3:00 PM
263	Our community. I do not want to service homeless in the “greater” area.	7/15/2024 2:52 PM
264	Green space	7/15/2024 2:38 PM
265	balance and faster decision making for UGB expansion	7/15/2024 2:14 PM

266	Old building, architecture and history preserved...	7/15/2024 1:45 PM
267	Existing wild places, farm land and native areas	7/15/2024 1:41 PM
268	DON'T mix farm land with subdivisions…. It's hard enough to farm without traffic making moving equipment harder. And the commuters are so angry at them being on the road….	7/15/2024 1:35 PM
269	Access to parks, forests, trails and biking infrastructure.	7/15/2024 1:17 PM
270	Agricultural land and wilderness. Discourage sprawl and residential that requires automobiles as the primary or only source of access.	7/15/2024 1:12 PM
271	Clean up Portland before spreading outwards to further communities!	7/15/2024 1:11 PM
272	Access to nature, clear difference between urban and nonurban.	7/15/2024 12:58 PM
273	Farm land.	7/15/2024 12:47 PM
274	Forests and farms	7/15/2024 12:44 PM
275	Forests and nature areas to protect animals	7/15/2024 12:41 PM
276	The ability to get outside the city boundaries within a short amount of time. Keep the boundary where it is and preserve the surrounding farmland and wide open spaces.	7/15/2024 12:40 PM
277	Habitat connectivity and opportunities for people to connect to nature close to where they live.	7/15/2024 10:53 AM
278	Urban growth boundary (PLEASE PREVENT SPRAWL!), parks, natural areas, bike paths	7/15/2024 10:35 AM
279	Vibrant, dense urban neighbors, along with green spaces.	7/15/2024 9:56 AM
280	Green space in the form of parks inside the UGB.	7/15/2024 7:25 AM
281	Trees and parks	7/15/2024 6:59 AM
282	Parks, greenspace, forests.	7/15/2024 6:34 AM
283	Middle income housing. Don't expand the boundary for McMansions.	7/15/2024 6:07 AM
284	Vulnerable ecosystems and natural areas.	7/15/2024 12:26 AM
285	Nature, local communities, and parks.	7/14/2024 9:17 PM
286	I want to ensure existing small businesses and minority-run businesses are preserved. I want minority neighborhoods to be preserved and not gentrified or torn down. I want to preserve nature and existing waterways.	7/14/2024 9:11 PM
287	Land. Farm fields. Country. Acres	7/14/2024 7:33 PM
288	Our natural and agricultural land outside city boundaries.	7/14/2024 6:14 PM
289	Green spaces for all	7/14/2024 5:37 PM
290	Water and land	7/14/2024 5:29 PM
291	Community	7/14/2024 5:15 PM
292	Greenways along waterways and ridgelines. Nature parks at major high points. High value agricultural land in WashCo and ClackCo.	7/14/2024 3:55 PM
293	Rural communities and farming communities.	7/14/2024 3:35 PM
294	Less growth, more green space and trees	7/14/2024 3:25 PM
295	I would like to see greenspaces preserved. I want my children to continue to see wetlands and the plentiful creatures that live there. I'd like to see the beauty of our area maintained.	7/14/2024 2:16 PM
296	Green areas, envrionment protected, private forests protected and waterways protected.	7/14/2024 1:53 PM
297	Forests and farmlands.	7/14/2024 12:58 PM
298	Green space.	7/14/2024 12:44 PM
299	Farm lands and agriculture	7/14/2024 12:12 PM

300	I would like to see our growth boundary remain the same, as the region has plenty of land that already sits empty, or ripe for redevelopment.	7/14/2024 11:25 AM
301	Farmland, rural areas, trees I want to keep these small communities small.	7/14/2024 11:24 AM
302	Our small community size of sherwood	7/14/2024 11:19 AM
303	Sherwood as a smaller town.	7/14/2024 11:16 AM
304	Land	7/14/2024 10:48 AM
305	Agriculture and farm land	7/14/2024 10:28 AM
306	Small towns stay small towns. Water in the hills is already becoming scarce.	7/14/2024 10:25 AM
307	Green space, farming communities, small towns	7/14/2024 10:13 AM
308	Farmland, agriculture and green spaces	7/14/2024 10:03 AM
309	Farms.	7/14/2024 9:43 AM
310	Wetland, existing forest, prairie, agriculture.	7/14/2024 9:25 AM
311	Not allowing transients and pan handlers in our nice city. Less small cheap housing.	7/14/2024 8:43 AM
312	Safe and pleasant biking and walking in all neighborhoods. Opportunities for neighbors to be together outside.	7/14/2024 8:17 AM
313	Stop the sprawl. Look to Los Angeles to see the negative affects. There needs to be balance.	7/14/2024 8:06 AM
314	Increase density while preserving existing greenspace	7/14/2024 12:07 AM
315	Green space, forest lands, infrastructure in existing neighborhoods.	7/13/2024 10:53 AM
316	Diversity in architecture, close attention to public transportation development	7/12/2024 11:40 PM
317	I love that Portland has beautiful nature very close to the metro area limits. It's always heartbreaking to see nature torn down and continue urban sprawl. I saw this first hand in Tigard near Roy Rogers and scholls ferry. I also really like how the Portland area doesn't feel like it has crazy urban sprawl and that you can get through the city quickly. Other cities with large urban sprawl that come to mind are phoenix, Denver, and LA. I don't want Portland to be anything like those cities.	7/12/2024 8:13 PM
318	Access to natural areas.	7/12/2024 7:47 PM
319	Transit access, bike lanes, sidewalks, neighborhood density, mixed use zoning	7/12/2024 6:10 PM
320	farmland	7/12/2024 5:31 PM
321	As a working commuter from Sherwood to Portland - there is nothing of value to preserve.	7/12/2024 1:10 PM
322	Population density and shared public spaces	7/12/2024 12:14 PM
323	Preserve park spaces, natural ecosystems, walkability/access to public transport.	7/12/2024 7:47 AM
324	Access and proximity to nature, metro in places and Sherwood itself especially have done well at incorporating/mixing natural area into its development, this should not falter and maybe even should improve and expand some.	7/12/2024 7:15 AM
325	Green spaces and parks, nature trails / natural areas, low-height buildings.	7/12/2024 7:12 AM
326	Wildlife corridors and community spaces.	7/12/2024 12:22 AM
327	Nature! Please keep the city from expanding even more in unsustainable ways.	7/11/2024 11:52 PM
328	Nature. Expanding the urban growth boundary negates needed commitments to mitigate climate change and stop ecosystem destruction. Leave land untouched, humans are not the only creatures entitled to the Earth and this land in particular.	7/11/2024 10:31 PM
329	Our green spaces. The thing that makes this place desirable (and livable as the climate warms) is our older growth wild spaces. Single family homes are not needed as much as shared green spaces.	7/11/2024 6:57 PM
330	The trees, farmland, natural areas, and historic pre-WW2 elements of our built environment	7/11/2024 6:12 PM

	that remain.	
331	Farmland and natural areas.	7/11/2024 4:27 PM
332	The semi-rural aspect of life on the outskirts of the UGB.	7/11/2024 10:33 AM
333	Forests, rural areas, non developed land outside the urban boundary	7/10/2024 10:14 PM
334	Agriculture land	7/10/2024 9:51 PM
335	Single Family Housing with a yard	7/10/2024 8:30 PM
336	Abundant close natural areas. Stewardship of those areas.	7/10/2024 5:14 PM
337	Natural areas and green spaces. Valuable historic buildings and community buildings.	7/10/2024 12:08 PM
338	The beauty and tranquility of the countryside of west Sherwood needs to be preserved. We don’t need any more subdivisions nor apartments out here.	7/9/2024 9:48 PM
339	The ability of local governments to be able to make decisions in their own cities best interest. Free of regional and state government interference. There are plenty of general guidelines in place.	7/9/2024 3:43 PM
340	individual livability, nature, neighborhoods, small businesses, small scale schools and other public facilities, good jobs, happy people and families,	7/9/2024 3:15 PM

Q2 What changes would you like to see as greater Portland continues to grow?

Answered: 340 Skipped: 25

#	RESPONSES	DATE
1	Infrastructure to support the insane influx of people. Traffic is horrific, the building is out of control, and people who have lived here longer than 20 years cannot afford to live here any longer. PDX is no longer amenable to folks, do something about the homeless issue and put checks in place on overdevelopment without infrastructure development.	8/23/2024 10:06 AM
2	More affordable housing	8/22/2024 9:51 PM
3	Less attention to Metro and more attention to individuals	8/22/2024 9:44 PM
4	I'd like to see more affordable housing options integrated into all neighborhoods, better access to public transportation, and the creation of inclusive community spaces that reflect and support the diversity of the Portland metro area.	8/22/2024 9:42 PM
5	Lower density housing w/larger lots	8/22/2024 9:38 PM
6	Growth for the people, not for the developers	8/22/2024 7:24 PM
7	More awareness and protection of our green spaces. The way to do this is NOT by these large swaths of land covered by cookie cutter housing with no yards or trees. So much of our agricultural land has already been covered with these. It needs to stop!	8/22/2024 6:57 PM
8	Less new houses and empty business buildings	8/22/2024 6:51 PM
9	Greater density, more mass transit	8/22/2024 6:46 PM
10	Road improvements	8/22/2024 6:44 PM
11	Stop the sprawl. Start building up not out. Use the land and vacant buildings already in existence! Less property taxes!!!	8/22/2024 6:29 PM
12	Less industrial. Warehouses continue to be built even though there is a plethora of empty warehouse space. The existing warehouse space should be utilized prior to any further construction, or permits for that matter, proceed.	8/22/2024 6:28 PM
13	Allow our region to be nimbler in addressing current and future housing and employment needs.	8/22/2024 6:06 PM
14	Revitalize urban areas that are abandoned and deteriorating areas.	8/22/2024 4:57 PM
15	Family Housing next to and adjoining parks and wetland areas.	8/22/2024 4:38 PM
16	Greater consideration of door to door transportation needs.	8/22/2024 1:13 PM
17	Implementation of plans to handle increased traffic that comes with development.	8/22/2024 11:42 AM
18	More infill housing in high opportunity areas so that Portlanders aren't priced out to the edges of the city. More investment in public and active transit infrastructure.	8/22/2024 11:39 AM
19	Not burdening the existing property owners with the infrastructure improvements and additional schools needed for those that don't even live here (yet).	8/22/2024 10:11 AM
20	Greater density and infill, especially such that it creates mixed-income buildings and communities	8/22/2024 10:08 AM
21	I would like to see underutilized or unused land and buildings be repurposed vs. continued sprawl into the countryside.	8/22/2024 2:52 AM
22	Smart density that positively impacts social predictors of health and safety	8/21/2024 11:09 PM
23	There should be better thought out investment in our transportation network. Prioritize auto traffic with high capacity, attractiveness, and generous amounts of off street bike routes. Pay	8/21/2024 10:52 PM

	attention to existing traffic patterns and work to make them more efficient.	
24	More density, more abundant infill housing, investment in transit so areas like Sherwood are reachable from areas like Gresham.	8/21/2024 10:47 PM
25	Homelessness and crime crack down	8/21/2024 9:32 PM
26	I would like to see a ton more infill. there are a lot of brownfield opportunities and a lot of neighborhoods that could thicken-up and benefit the existing residents as well as new ones	8/21/2024 8:16 PM
27	I would like to see policies enacted that are mindful, of and protect, the environment.	8/21/2024 6:06 PM
28	More recognition of climate changes needs in planning. We need local resources for food.	8/21/2024 5:50 PM
29	Higher density within the UGB to limit the cities impact on the environment and increase the city’s tax revenue per acre.	8/21/2024 4:55 PM
30	More affordable housing.	8/21/2024 4:22 PM
31	I would prefer growth happen through infill and greater density than the sprawling developments currently threatening our ag ground and green spaces.	8/21/2024 3:40 PM
32	More focus on reducing traffic that is not just adding public transit or tolls. With so much high-density development going in, it's becoming worse and worse everyday. Figure out and invest in roadways that make sense instead of just assuming people will take public transit. Or actually make our light rail more useable/high-speed...it takes 45 min to go from Beaverton transit center to PGE park. If we actually had express rail, I think more professionals and commuters would consider railway.	8/21/2024 2:58 PM
33	Increased density, transit, walking and biking infrastructure. "Baseline analysis conducted for this Urban Growth Report reveals that there is likely room to accommodate most, if not all, of the region’s existing and future housing needs inside the existing UGB for the next 20 years. "	8/21/2024 2:35 PM
34	Transportation options that efficiently use current and practical evolving modes of transportation. As an example, I do not want to see another bridge project (such as the Tillicum Crossing) that, through social engineering, only provides for a very small percentage of the population.	8/21/2024 10:54 AM
35	Road and traffic improvements.	8/21/2024 8:33 AM
36	Less government	8/21/2024 7:10 AM
37	Roads that are designed to alleviate congestion. Sherwood is small town but I sit in traffic a lot. There should be a traffic light at Chapman Rd and Hwy 99.	8/20/2024 11:35 PM
38	Redeveloping existing underutilized urban areas.	8/20/2024 7:43 PM
39	More safety. Traffic ease. High paying jobs so people here don't need to travel so far to work.	8/20/2024 6:24 PM
40	I would like to see revitalization of already developed areas.	8/20/2024 6:21 PM
41	I would like to see more critical thought in regards to expanding the UGB.	8/20/2024 6:19 PM
42	Less industrial near neighborhoods	8/20/2024 5:00 PM
43	better use of land already within the existing urban growth areas	8/20/2024 4:55 PM
44	Traffic congestion considered more intensly when developing neighborhoods	8/20/2024 4:53 PM
45	Urban growth expansion	8/20/2024 4:49 PM
46	thoughtful expansion rather than what is happening in Sherwood. The Sherwood proposal is way too large for a city of this size and encroaches on native habitats and pristine farmlands.	8/20/2024 4:48 PM
47	Is it truly growing or are we just following the money?	8/20/2024 4:25 PM
48	Smaller pockets of houses instead of mass acres of land covered with housing	8/20/2024 4:20 PM
49	Restoration of life in Portland's downtown core, the heart of greater Portland.	8/20/2024 4:18 PM
50	Again, more public comment, too many developers s d city councils looking for a tax base are driving decisions related to the UBB	8/20/2024 4:10 PM

51	Encourage and support business placement in downtown Portland area in order to utilize already existing business areas. Preserve rural areas and Oregon farming families.	8/20/2024 4:03 PM
52	Keep industrial in industrial areas and residential in residential areas, and do not invade the agricultural reserves	8/20/2024 3:52 PM
53	adequate roads, more dense housing, affordable housing	8/20/2024 3:52 PM
54	More infill and creative uses of office buildings and abandoned warehouses	8/20/2024 3:46 PM
55	Increased public transportation	8/20/2024 3:46 PM
56	housing to be more affordable, transportation system that works	8/20/2024 3:31 PM
57	Better review, consideration and preservation of agricultural land in the metro area for growth. The building and growth has not kept pace with our current resources, infrastructure and good land use management and planning.	8/20/2024 2:53 PM
58	Dedicated transportation corridors to expedite commerce, e.g., Tualatin Sherwood Rd. should have limited intersections and bypass Tualatin	8/20/2024 2:01 PM
59	focus on preservation of agricultural lands	8/20/2024 1:47 PM
60	Affordable housing, green spaces	8/20/2024 10:54 AM
61	Better planning (including securing funding and complete transparency about costs to the tax payers) for traffic changes BEFORE developments are allowed	8/20/2024 9:44 AM
62	Better investments in rail passenger transit and a long-term regional passenger rail plan so that new developments can include TOD. The region's investment in passenger rail has stalled.	8/19/2024 6:09 PM
63	Better infrastructure and condensed housing within already developed community areas	8/19/2024 12:45 PM
64	Increased urbanization, density, and density within non-Portland downtowns especially.	8/19/2024 12:05 PM
65	More dense housing, less car-centric developments	8/18/2024 11:22 PM
66	Denser housing and more public transit	8/18/2024 10:17 PM
67	Build up, not out. Nobody is asking for Sherwood West. It’s unnecessary sprawl that will compound the existing transportation issues of the Southwest Corridor.	8/18/2024 9:24 PM
68	Increase density within 1 mile around our frequent bus services and super dense high rises adjacent to our MAX stops. We need to build more inside the UGB.	8/18/2024 8:37 PM
69	Greater density of housing and amenities	8/18/2024 8:30 PM
70	Slow down the growth, get the traffic under control. From Sherwood it used to take me 50 minutes to the airport, now almost 2 hours. They need to fix the roads before adding more houses	8/18/2024 7:01 PM
71	Greater density and better transit connections through the Portland metro area. Interesting walkable neighborhoods that develop culture and community.	8/18/2024 5:10 PM
72	Densification of the city and its surrounded suburbs. If we want to retain the livability of the region by getting people to use alternate forms of transportation we need to continue to enforce the UGB	8/18/2024 3:42 PM
73	Better highways and main roads	8/18/2024 3:25 PM
74	Less urban sprawl, more density	8/18/2024 2:37 PM
75	More infill housing, fewer cars, more trains, buses, and protected bike lanes with bollards.	8/18/2024 2:25 PM
76	Better high capacity transit, density, less spawl. Municipalities should backfill, densify, and remove parking lots before being granted more land to sprawl out.	8/18/2024 2:25 PM
77	More density along transit corridors	8/18/2024 1:35 PM
78	Improved public transportation. Use existing land already inside UGB.	8/18/2024 1:21 PM
79	Stop trying to make everything part of Portland. Individual communities have their OWN rich history and connections. We are not just Portland's little subsets to absorb and use as needed	8/18/2024 1:20 PM

	by metro.	
80	Denser, smart land use of the existing UGB.	8/18/2024 1:11 PM
81	More density and better transit	8/18/2024 12:49 PM
82	Road expansion first!	8/18/2024 12:29 PM
83	Reducing the massive barriers to infill housing, and an end to frequent UGB expansions for suburban housing.	8/18/2024 11:49 AM
84	Infill, improved land-use, and no further sprawl.	8/18/2024 11:27 AM
85	The existing empty structures being utilized.	8/18/2024 10:00 AM
86	Protect farm land, while also providing more reasonably priced homes. And the infrastructure to support the housing.	8/18/2024 9:40 AM
87	Stop the dense housing if so called affordable housing that is NOT affordable!	8/18/2024 7:48 AM
88	Is Portland really growing?	8/18/2024 7:19 AM
89	Less focus on high density housing and Multifamily apartment living. Focus on using what is not used properly at this time within the boundaries just growth potential and forecasting/opportunity does not require tax payers to accommodate without due diligence to preserve and repurpose the existing land and structures available.	8/18/2024 7:08 AM
90	Fewer large subdivisions with houses stacked on top of each other. Proper roads and sidewalks paid for by developers	8/18/2024 6:28 AM
91	Well thought out and sustainable plans, ways to arrange cities to minimize traffic rather than continuing to expand roads.	8/18/2024 1:08 AM
92	More public transportation	8/17/2024 8:46 PM
93	New housing should be built on a variety of lot sizes rather than only very small lots	8/17/2024 2:48 PM
94	The greatest need that we have in Sherwood, is affordable housing for young families and seniors. We need to get creative in what we build in Sherwood. We do not have the infrastructure to support dense housing except right next to 99. And even then we don't have any transportation hubs. People move to Sherwood to feel like they're in the country a bit.	8/17/2024 9:10 AM
95	Preserve our important farmland and forest- less massive homes, more urban density and the public transport to support it.	8/17/2024 8:27 AM
96	Keeping our small cities small and rural.	8/17/2024 8:02 AM
97	Focus on density, not expansion out. And a priority on affordable housing, not larger single family homes.	8/17/2024 5:18 AM
98	Roads and traffic control	8/16/2024 11:03 PM
99	More space for more single family homes. Prices will go down and more people can live in our beautiful state. Also bigger roads and more infrastructure	8/16/2024 9:55 PM
100	Improve infrastructure such as roads bridges	8/16/2024 9:31 PM
101	I am against adding housing in areas that are already congested. I am also opposed to adding housing in areas currently designated as farmland	8/16/2024 4:23 PM
102	The elimination of urban sprawl and the protection of our natural resource environments	8/16/2024 4:23 PM
103	Portland is not growing. More people have moved out of Portland and Oregon than have moved in over the last couple years.	8/16/2024 11:44 AM
104	keep high density housing near Portland/metro cities downtown areas, better public transportation, less traffic	8/16/2024 7:35 AM
105	Adequate infrastructure planning to accommodate for necessary growth. More willingness from local jurisdictions to work with investors and developers to master-plan communities that allow for greater (& smarter) population growth.	8/15/2024 1:41 PM
106	Improved infrastructure needs to be established before any expansion in development needs to	8/15/2024 12:15 PM

	take place.	
107	Push Eastward and now Westward	8/14/2024 1:08 PM
108	Urban grown boundaries reduced to a lower rate, use land more efficiently for housing and roads.	8/14/2024 7:01 AM
109	There are plenty of homes and industrial properties without adding more homes and spreading more	8/14/2024 6:25 AM
110	Increased lanes on throughways and highways.	8/14/2024 5:31 AM
111	I would like to see further vertical growth in the current urban boundary as the infrastructure for the surrounding area isn't meant to support the proposed growth.	8/13/2024 10:06 PM
112	More forests, trees planted and LESS ticky tack multifamily housing put in.	8/13/2024 8:58 PM
113	Better handling of traffic congestion and improved caretaking of our nature and our green spaces.	8/13/2024 7:54 PM
114	less traffic	8/13/2024 4:45 PM
115	Use preexisting empty buildings vs clearing areas for new construction	8/13/2024 4:06 PM
116	Slowing down the expansion of large commercial facilities, industrial parks etc., that sit vacant for so long.	8/13/2024 3:46 PM
117	address congestion	8/13/2024 3:29 PM
118	Defund Metro	8/13/2024 1:58 PM
119	Maintain existing roads, less traffic, use abandoned buildings, industrial and commercial to be converted into housing instead of taking away more land.	8/13/2024 12:55 PM
120	Think about what your taking away from the community as you think your just building a community and the reasons people wanted to move to sherwokd to begin with isn't what sherwood is anymore. We used to be a rural close knit community filled with farms and hard working farm families. Those are less and less every year and it's just becoming another suburban area filled with homes and shopping. We've lost what sherwood is all about.	8/12/2024 6:13 PM
121	A road system developed to meetnot automobile traffic demands and less compromised for biking.	8/12/2024 5:29 PM
122	more mixed use developments so that people can enjoy amenities like shopping and restaurants right outside their front door	8/12/2024 4:56 PM
123	A new Max line along Sunset Hwy west from transit center to Banks	8/12/2024 4:44 PM
124	Less people less traffic, tougher on crime.	8/12/2024 10:01 AM
125	I want to see less growth, less homeless, and more crack down on crime. This would help clean up Portland and get it back to its natural beauty!	8/12/2024 7:23 AM
126	Encourage bike and walkable neighborhoods. Lessen car use. Density not sprawl. I think Orenco is a good model with green neighborhood spaces. Porches that face on another. Cars behind the houses to promote community.	8/11/2024 10:45 PM
127	THOUGHTFUL development with appropriate infrastructure… no more low cost developments of poor quality buildings that still fail to provide truly affordable housing. Build to meet the population's demands, not to put money in the pockets of developers	8/11/2024 8:32 PM
128	LESS HOMELESS, LESS CRIME, just non of that. Ya no mas indigentes peligrosos, ni crímenes. Menos fourplex. Mas edificios de 10 pisos con ZONA VERDE Y ÁRBOLES.	8/11/2024 2:32 PM
129	Less density. Better traffic planning. Major arteries in Sherwood now are overloaded with cars	8/11/2024 10:27 AM
130	As a lifelong Oregonian, I have generally been in favor of land use planning. I believe, however, at times the process has been too restrictive. For example, the report acknowledges that there is a lack of appropriate industrial land, even though the available land is within projected needs. Leaning towards the high side of projections could also more than offset demand, thereby helping with affordability.	8/11/2024 8:18 AM

131	More housing and more land available for more single family housing.	8/10/2024 11:46 AM
132	More green and open spaces	8/10/2024 10:36 AM
133	More open space and preservation of agricultural and forest land.	8/10/2024 9:58 AM
134	Sensible development	8/10/2024 7:37 AM
135	More safe parks and recreation opportunities. Affordable housing to OWN, not rent.	8/9/2024 11:15 PM
136	Less density	8/9/2024 6:07 PM
137	Allow more parking	8/9/2024 5:50 PM
138	Much has been said about the need for more housing such as multiple dwelling units where high density can be capitalized. There needs to be a balance between more housing, preservation of existing rural land uses and lifestyles. The question is how much more housing is actually needed with its impact on roads, public service infrastructure such utilities, water, sewage, etc coupled with the total financial resources that will be passed on to the taxpayers.	8/9/2024 11:13 AM
139	Less density in housing development.	8/9/2024 9:51 AM
140	Stop expanding and use what you already have. This includes proper planning so we are not stuck with traffic in 5-10 years, farmland reserves.	8/9/2024 9:32 AM
141	More high density, affordable living spaces with the existing urban growth boundary.	8/9/2024 6:58 AM
142	Less people moving here	8/8/2024 9:04 PM
143	Keeping nature	8/8/2024 8:18 PM
144	Greater Portland should not grow until Portland is cleaned up and managed properly.	8/8/2024 7:45 PM
145	Fill in. Focus on Multifamily. You'll have more than you need as BBs downsize or die.	8/8/2024 7:45 PM
146	To start and continue rejuvenating the downtown or existing empty buildings	8/8/2024 7:28 PM
147	Less new housing	8/8/2024 7:19 PM
148	More density, less sprawl	8/8/2024 7:05 PM
149	Stop spreading into agricultural/forested lands	8/8/2024 6:28 PM
150	Keep land as is no more commercial growth	8/8/2024 6:24 PM
151	More freedom with offers by the constitution. More police, fewer taxes and voting in person with a government photo document.	8/8/2024 5:38 PM
152	improve the roads before development occurs	8/8/2024 3:43 PM
153	I would like to see people buy homes and not hedge funds. We don’t need more new construction homes, we need to promote homeownership and upkeep in already established communities	8/8/2024 1:58 PM
154	Transportation connectivity prioritized to help mitigate congestion on arterial roadways.	8/8/2024 1:04 PM
155	less homeless camping on public and private land.	8/8/2024 12:02 PM
156	Better roads	8/8/2024 11:42 AM
157	Better road conditions, and not much more than that. Sick of the high rise homes, and the SAME stores/eateries in every strip mall. But that is our of your control.	8/8/2024 11:42 AM
158	We need to make it legal to thicken up our existing neighborhoods in an incremental and productive way rather than bankrupting our communities on unsustainable growth patterns that we can't maintain.	8/8/2024 11:25 AM
159	Repurpose buildings in Portland & other areas	8/8/2024 11:04 AM
160	Not to add more land around Sherwood	8/8/2024 10:47 AM
161	Stop adding more homes to cities where the traffic is already a nightmare, like Wilsonville	8/8/2024 10:12 AM
162	Expand freeway lanes	8/8/2024 9:54 AM

163	More consideration to how the growth effects our rural communities and small family farms that feed our community	8/8/2024 9:42 AM
164	Really thinking through the big picture. Not pressured by builders for $$. Infrastructure, road improvements for capacity, sidewalks, parks, natural areas. Not all filled in	8/8/2024 9:37 AM
165	Fix Portland and all their issues by helping rebuild and develop more businesses. Sherwood doesn't need Metro because we have grown more than what is acceptable and Metro needs to stay out of our part of the world.	8/8/2024 8:49 AM
166	That's some video officials. Don't make it all about getting more tax money and leave some of the spaces as they are.	8/8/2024 7:14 AM
167	Maintaining Oregon's natural beauty by NOT having tons of concrete and strip malls.	8/7/2024 11:21 PM
168	Increase urban density. Build/create more housing connected to transportation.	8/7/2024 8:39 PM
169	greater use of land currently available within UGB (example infill current space vs expansion)	8/7/2024 8:21 PM
170	less traffic, preservation of UGB, improvement of downtown portland the way it was before 2020	8/7/2024 7:57 PM
171	More leadership by people of color, in elected and also executive leadership at Metro	8/7/2024 4:34 PM
172	More efficient use of land close to job centers. I'm surprised there is still farmland inside of I-205. Also, I would like to see a bridge over the Willamette between Oregon City and Wilsonville, and a bridge over the Columbia east of I 205. Nice job with the new recreation area Chahalem Ridge.	8/3/2024 8:26 PM
173	Less homeless, legalized prostitution, bike lanes everywhere	8/3/2024 3:14 PM
174	Cited above...more housing within UGB; build up/onto current buildings, golf courses, unused land, homes, convert hotels/motels, revitalize areas inside the city, promote ADUs, offer incentives etc.	8/3/2024 12:50 PM
175	Better transportation system, specifically an I-5 to OR 99W connector between Wilsonville (or just north of), and to the south of Sherwood. Preferably an expressway.	8/2/2024 11:42 PM
176	Less car-dependent development. More new gas stations and charging stations. More small neighborhood markets. Building that is not just residential homes. The more new homes, the more new amenities needed to go with them. Otherwise it creates traffic and time bottlenecks.	8/2/2024 3:13 PM
177	A west side highway should be built, mirroring 205. Too much traffic burden is put on 217 and roads like Roy Rogers	8/2/2024 12:30 PM
178	I would like to see the ability for more PUD subdivisions, a break up of housing within a subdivision. Rather than throwing all townhomes in an area it would be nice to allow for open space, different product types, and community areas.	8/1/2024 12:31 PM
179	Use of more brownfields and infill. Replace single story multi family homes with multi story homes	7/31/2024 11:31 AM
180	Bigger tax lots. No one wants to live in a match box. I would pay MUCH higher purchase prices to have a quality property.	7/31/2024 8:37 AM
181	"Middle housing", which allows more housing within defined spaces in the city as well as in the suburban areas. Include some green areas for multiple unit buildings, e.g. courtyards.	7/30/2024 7:44 PM
182	more preservation of nature and fish and wildlife habitat	7/30/2024 2:53 PM
183	Really plan for future growth. Especially guaranteeing there is adequate infrastructure to support the past, currnet, and future growth.	7/30/2024 8:55 AM
184	Improved street designs clearing the hazards of parked cars and narrow lanes.	7/30/2024 8:22 AM
185	Less focus on density. More focus on asthetics/attractive neighborhoods	7/30/2024 7:14 AM
186	More parking in commercial areas and in new buildings. Accessible commercial and residential spaces for people with mobility issues. Reduced developer, landlord and realtor greed - so housing costs can become affordable.	7/29/2024 11:37 PM
187	Actividades familiares,viviendas para personas mayores de 55 y retirados.	7/29/2024 7:21 PM

188	More housing in old industrial areas like Portland's Central Eastside. Preserving old homes and green space. Increased density in suburban areas as well as in the city instead of development on farmland and forests.	7/29/2024 11:48 AM
189	Build Up not Out!	7/29/2024 9:35 AM
190	Investment in infrastructure like roads, bikeways, transit. There needs to be a plan to move the people around the area. How do people get from Sherwood to downtown without adding to gridlock? I would also like to see fewer corporations owning properties and renting, than affordable properties for entry level home buyers.	7/29/2024 7:48 AM
191	no sprawl more density and walkabity. abolish highways, improve public transport	7/28/2024 12:50 PM
192	More walkable/bikable neighborhoods. Less new suburban sprawl.	7/28/2024 8:34 AM
193	Denser housing options, infill development, and transit-oriented housing.	7/28/2024 8:26 AM
194	Vertical growth. More condos in dense areas. And add one or two new dense city center type location. Maybe one east and one west.	7/25/2024 7:17 PM
195	Less crime, better transportation systems, fewer homeless	7/24/2024 5:33 PM
196	See above	7/24/2024 3:55 PM
197	Additional expansion of the UGB to keep overall costs low for development while providing opportunities to access public transit and provide workforce housing for major employers and employment hubs.	7/24/2024 11:56 AM
198	Make it easier for developers to build dense mixed use in areas already within the UGB. If that means tax incentives for five story condos, or repealing parking minimums for new builds, or making the bureaucratic cost of applying for redevelopment/remodeling of office/commercial into residential, do it!	7/24/2024 7:32 AM
199	More space for affordable housing	7/24/2024 12:10 AM
200	Easing traffic quagmires and building more sustainably. Safer communities. Walking paths and farmer's markets. Manufacturing jobs and training programs for future employees.	7/23/2024 9:20 PM
201	Denser Development	7/23/2024 8:54 PM
202	Allowing more single family and multi family housing that creates quality neighborhoods and communities.	7/23/2024 8:30 PM
203	Increase density, like A LOT. The best things about cities are only really possible when adequate desnities are achieved. Even issues such as public safety can be addressed by having more people around. Portland is nowhere near the density levels needed to support the kind of sustainable urban form that most of us actually desire. Walkable neighborhoods require lots of people walking to places like grocery stores to support them. Transit only makes sense for occasional users (e.g., those of us that work from home) if service is frequent enough and reliable enough that we don't have to spend a lot of time figuring out when the next bus will arrive. Those things require density.	7/23/2024 6:39 PM
204	Redevelop and repurpose current real estate	7/23/2024 6:19 PM
205	Enforcement of current immigration laws, support for property rights of current landowners and value esp for senior citizens	7/23/2024 3:19 PM
206	A major reduction in single family housing and expansion of car dependent suburbs, a focus on walkable neighborhoods with character and dense multi unit housing projects, transit and bike oriented design, infill of the vacant parking lots across east portland	7/23/2024 3:14 PM
207	For development kept closer to city centers and leave space for areas of land and farms in tact.	7/23/2024 2:12 PM
208	higher density in current Urban areas	7/23/2024 12:06 PM
209	No expansion permitted unless accompanied by concurrent expansion of public transportation.	7/23/2024 11:17 AM
210	Increased density, better transit	7/23/2024 2:36 AM
211	That the city and state government follow environmental code and NROd as significant as	7/22/2024 3:06 PM

	addressing affordable housing. I would like the state to start doing conservation efforts to prevent forest fires before they adding more infill, especially in rural areas	
212	More passenger rail & LRT	7/22/2024 6:07 AM
213	Protection of natural and farm land	7/21/2024 12:16 PM
214	More dense affordable housing with public transportation, work space with shopping hubs	7/21/2024 10:35 AM
215	Access to rapid transit in all corners of the metro. Buses are not rapid transit unless they are given priority and actually go faster than traffic.	7/21/2024 9:49 AM
216	The area is losing residents. There's no reason to extend the growth boundary.	7/21/2024 9:00 AM
217	More density	7/20/2024 9:12 PM
218	Less ugliness and more nature	7/20/2024 8:57 PM
219	Better public transit. We must expand the MAX into the SW metro on a common-sense alignment, not the poorly planned alignment that was proposed before. We must expand streetcar service all over Portland proper. Examples for the streetcar would be down into Lake Oswego, down Sandy Blvd., north up MLK Blvd. to Lombard St., from the MAX west down Lombard all the way to St Johns, down 82nd Ave., down 122nd Ave, and much more. Other corridors need bus rapid transit. Incentivize density of housing along all transit corridors and even deep into underserved neighborhoods. We have a terrible housing shortage and density is needed.	7/20/2024 7:38 PM
220	Not fall into the "cookie cutter" trap. Make sure public transit keeps up with growth AND make sure cars aren't excluded. Parking is needed. Mass transit doesn't work for all.	7/20/2024 10:41 AM
221	I would like to see a stronger move towards mixed-use, walkable, transit-oriented communities. I think the suburbs are really lacking in this regard due to historical planning trends, but we are seeing some changes in the right direction. I think we should embrace "Vision Zero" planning, with separated bike paths, human-scaled streets, and traffic calming measures. I would love it if my kids could walk to school someday. I would love to see every neighborhood have a grocery store within a short, safe bike ride. I would love to see more starter homes that are affordable, such as townhomes and row houses, close to amenities. Bonus points if some townhome plans have a bedroom/kitchen on the first floor for aging family members.	7/20/2024 9:28 AM
222	More dense neighborhoods with increased public transit options.	7/20/2024 7:41 AM
223	Bring back the wetlands of Portland! Wetland parks everywhere! MORE DENSITY, LESS DESTRUCTION. Build townhomes! Build small apartment blocks! Build corner stores and apartments above retail!	7/20/2024 12:38 AM
224	Before we look at expanding into the urban reserve, I'd like to see local government take better care of existing areas where there are economic and racial disparities. If we can't even properly manage what we have, why add more?	7/19/2024 4:15 PM
225	We don't need to make new developments car dependent. Build new developments with biking walking and transit first	7/19/2024 2:12 PM
226	More walkable and bikable development. Encourage density and preserve the rural landscape within a short distance to Portland. Re-ruralizing landscapes is almost completely impractical, we should preserve what we have while making our cities more livable.	7/19/2024 2:06 PM
227	More development and land use planning towards dense housing centered around walkable neighborhoods and transit oriented travel. We should not be building the most inefficient form of housing that is continuously built (single family homes) in areas where a car is necessary to survive. Walkable, dense neighborhoods is vital towards creating a more sustainable future.	7/19/2024 12:40 PM
228	More enforcement of developers not following the law, including seizing property through eminent domain if they fail or refuse to produce enough affordable housing units.	7/18/2024 9:44 PM
229	More public transportation.	7/18/2024 12:03 PM
230	We have plenty of land available for development. Until literally the entire metro is covered with 3-story buildings, there should be no UGB expansions. Along these lines, we need to continue improving public transit focusing primarily on what will attract more ridership.	7/18/2024 10:20 AM
231	More emphasis on public transit for those in the outlying areas. Trimet is not keeping up with	7/18/2024 6:16 AM

	the growth, and some of the outlying areas not accessed by a Max line have more difficulties in getting where we need to go.	
232	Greater distribution of high rise residential apartment buildings outside of the downtown core area, especially in Southwest. A MAX line spur from the current Washington Park station heading south, with stops for Council Crest, Hillsdale/Wells HS, Burlingame, Multnomah Village, Capitol HWY at 99W, Jackson MS, PCC Sylvania, Gabriel Park, Six Corners/Raleigh Hills,	7/17/2024 11:12 PM
233	STOP 🛑 Oregon infrastructure is the WORST I have seen. Traffic in rural areas will become disastrous with population growth!	7/17/2024 6:04 PM
234	Less roads and parking lots, more transit and fewer vehicle Miles traveled, more middle housing and mid-rise buildings. Daylighting buried streams, better fish and other animal friendly crossings. No data centers. No single story commercial and industrial buildings.	7/17/2024 2:18 PM
235	Stop building over our greenland. Land conservation.	7/17/2024 2:00 PM
236	More mixed used areas with less signle family housing.	7/17/2024 9:20 AM
237	build up and not out, and reduce parking footprint	7/17/2024 1:16 AM
238	More housing options, density, a mixture of all housing types — not just single family homes.	7/16/2024 11:18 PM
239	Stop growing out and think of growing up! Cities should be dense and walkable. Growth does not mean just go out. Look at European cities as an example. They have been around some for thousands of years without continuing to just expand out. Utilize the space they currently occupy.	7/16/2024 8:46 PM
240	A little more room for smart growth neighborhoods with row homes, townhomes, and small lot homes. The neighborhood should mainly be served by a park and neighborhood retail, grocery, and restaurants. Walkable is very important	7/16/2024 8:44 PM
241	More density; increased infill; redevelopment of underutilized land; demolition of older buildings to make way for newer, larger, and denser buildings; improved transit to serve the increasing population and density	7/16/2024 8:26 PM
242	Higher density housing options, more walkable neighborhoods, better sidewalks	7/16/2024 6:51 PM
243	Stop high density development that takes out all trees and natural area. Plan for roads, our roads already can’t support the population we have. Metro to have parks that allow dogs and not horses.	7/16/2024 6:26 PM
244	More density and mixed uses in every city core to create its own unique identity whole creating more walkability. This would also contribute to the ease of cycling and the viability of public transit projects, even in smaller cities. Mixed use, dense city cores would also create a tax surplus for local governments and metro to use for maintaining or expanding services.	7/16/2024 5:52 PM
245	Less high density housing that makes traffic worse since know one focuses on the impacts it causes on roads	7/16/2024 12:20 PM
246	More complete street systems. Transit expansions.	7/16/2024 10:24 AM
247	I would like to see greater opportunities for affordable housing and proximate employment for residents. I would like Portland to be a place my children would be able to live in.	7/16/2024 9:04 AM
248	Improved/increased access to mental health and in/outpatient A&D drug treatment	7/16/2024 8:09 AM
249	Better transportation options. Not only mass transit but more bridges to reduce congestion. People dont want to go into some areas like Portland and Vancouver just due to the traffic.	7/16/2024 8:00 AM
250	Greater density. More ADUs in existing neighborhoods	7/15/2024 10:34 PM
251	Stimulate (incentivize) redevelopment within existing boundaries. Of course it is easier to build new on bare, flat farmland... don't do it.	7/15/2024 8:39 PM
252	Better street cycling conditions	7/15/2024 7:50 PM
253	I would like to see entire neighborhoods built that include everything the increase in population needs: more stores, expansion of roadways to deal with traffic, more schools so that the	7/15/2024 7:17 PM

	schools that are there don't just increase class sizes, parks for families to enjoy so there isn't more crowding of the parks that exist, etc.	
254	Stopping the theft of our farm land for junk houses and o er crouding	7/15/2024 6:47 PM
255	A solution for all the empty commercial space, particularly close in, that is discouraging to the random flanneur as well as the residents. I would like the SW light rail to HAPPEN because I lived in SW (out near Tigard) and the traffic is beyond horrific - made me move back to NE Portland Yikes - it's literally untenable. And I don't want downtown to pay the price (becoming a donut hole).	7/15/2024 6:41 PM
256	Better mix of housing, better accessibility to transportation services and more. Better mass transit to suburbs and outer areas. Better job of keeping neighborhood integrity, better public safety	7/15/2024 5:54 PM
257	More land appropriately developed for a mix of single family and higher density housing. More single family is needed to help on the affordability goal.	7/15/2024 5:28 PM
258	I'm hoping for a change in mindset. or maybe more education... many people who value quality habitat and green spaces also don't like dense housing and don't see the connection. Many people want to live on acreage and in the Wildland Urban Interface, but it is damaging to wildlife	7/15/2024 5:22 PM
259	More affordable single family housing and safe, affordable public transit.	7/15/2024 5:19 PM
260	Please focus on walkability and public transit. Protected bike lanes, please! Get rid of parking lot requirements and allow mixed use zoning.	7/15/2024 5:17 PM
261	More parks, public transportation, less traffic	7/15/2024 5:12 PM
262	No growth	7/15/2024 4:37 PM
263	Increase in infrastructure - the growth continues but arterial roads are not developed/improved to support the traffic. Homes continue to be built in SW Beaverton, but nothing has been done to increase the traffic flow/capacity on Scholls Ferry - the primary freeway access point.	7/15/2024 4:03 PM
264	keeping urban sprawl under control	7/15/2024 3:31 PM
265	I'd like us to change BACK to when kids didn't have to be afraid in the streets and drugs/criminals didn't run amok in our City.	7/15/2024 3:25 PM
266	More single family homes	7/15/2024 3:00 PM
267	Safe communities -making them a priority.	7/15/2024 2:52 PM
268	A network of bike trail and larger freeways	7/15/2024 2:38 PM
269	its obvious we need more housing and job creation to support us. Metro takes too long to evaluate these expansion decisions, so we pass up opportunities.	7/15/2024 2:14 PM
270	Houses that are small for first time home buyers... not huge 4 bedroom homes with high end amenities. Small homes on large lots. With eco features like room for garden, underground water storage for watering garden, and solar panels on roof. No more granite counters and high end appliances. Your first home should be basic. That gives people something to strive for. Also stop the massive rentals of homes by non us citizens. Rent is more expensive than a mortgage. I know tons of home we're purchases in the economy crash of 2009 and purchases by foreigners to make $$ stop that practice. And you will have lower housing cost.	7/15/2024 1:45 PM
271	As few as possible	7/15/2024 1:41 PM
272	Better transportation infrastructure. Our roads have been the exact same going into/out of PDX 50 years or more	7/15/2024 1:35 PM
273	Improved public transportation and improved/increased use of multimodal trails and biking infrastructure.	7/15/2024 1:17 PM
274	High density in-fill and zoning upgrades near rapid transit access. Prioritize this BEFORE expanding the UGB.	7/15/2024 1:12 PM
275	Cheaper rates and less control	7/15/2024 1:11 PM
276	Stopping sprawl and addressing climate by building more compactly and decreasing highway	7/15/2024 12:58 PM

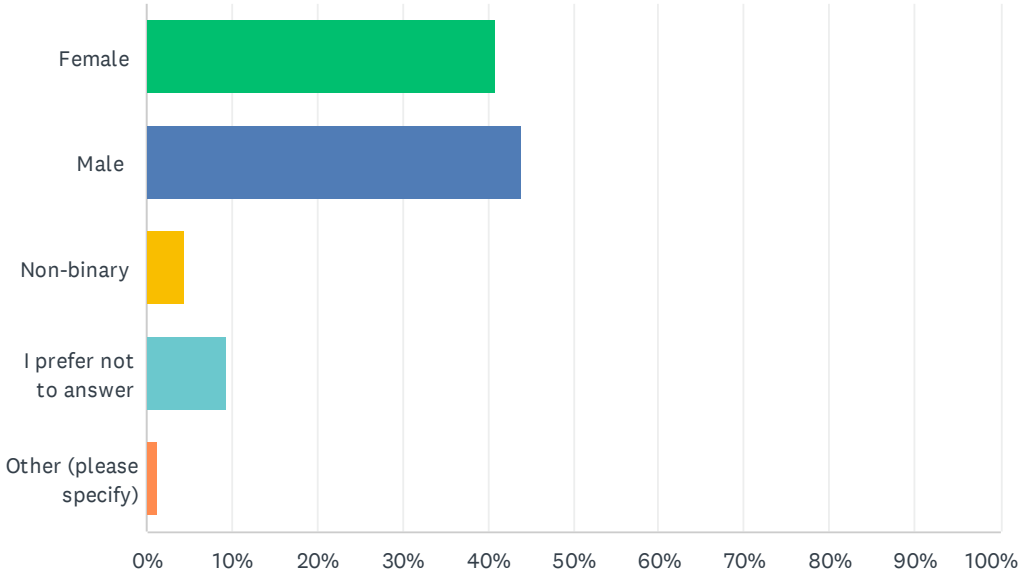
	modes of transportation.	
277	No more growth. No more crappy homes built tightly together. We need some countryside-trees, deer, birds, butterflies, rather than more concrete.	7/15/2024 12:47 PM
278	Fewer homeless, less garbage on the streets, more multi-family that includes parking	7/15/2024 12:44 PM
279	More requirements for affordable housing units. New apartments are ridiculously expensive and not built for families.	7/15/2024 12:41 PM
280	Grow up not out.	7/15/2024 12:40 PM
281	Smart transportation options, affordable housing within city centers and strong habitat protections for wildlife connectivity throughout our region.	7/15/2024 10:53 AM
282	Fewer parking lots, less sprawl, more dense housing, narrow freeways and add tolls, more bike paths	7/15/2024 10:35 AM
283	More bike infrastructure beyond the urban core of Portland.	7/15/2024 9:56 AM
284	Greater density. And safe transit. We can't use what we have because it is filthy and not safe. Bike paths need to be kept safe with regular more than daily patrols…bike cops or golf carts.	7/15/2024 7:25 AM
285	More protected bike lanes	7/15/2024 6:59 AM
286	Focus on basic municipal services: fix potholes, pave streets, erase graffiti, pick up the trash!	7/15/2024 6:34 AM
287	Safer highways (eg hwy 47) that include traffic circles.	7/15/2024 6:07 AM
288	Increased density and less sprawl.	7/15/2024 12:26 AM
289	I would like to see less traffic, and more public transportation options.	7/14/2024 9:17 PM
290	I would like to see more public transportation and multicultural businesses. I would like new neighborhoods to be open to everyone, both economically and culturally. We need more low and middle income housing in areas with good schools.	7/14/2024 9:11 PM
291	Continue to develop within existing boundaries.	7/14/2024 6:14 PM
292	Follow your plans and stay strong	7/14/2024 5:37 PM
293	Land conservation	7/14/2024 5:29 PM
294	Better traffic management	7/14/2024 5:15 PM
295	Better arterial transportation routes leading through the suburbs - landscaped parkways with grade separation like in NY/CT, but add transit and ped/bike. One from I-5 to the Newberg-Dundee Bypass (an actual I-5-99W Connector!) to help regional transportation. Another in the form of Sunrise Phase 2, extending to Sandy. And then a new tunnel and bridge from 26/Cornelius Pass to Rivergate in Portland.	7/14/2024 3:55 PM
296	Care for the current crumbling infrastructure before expanding.	7/14/2024 3:35 PM
297	More trees planted	7/14/2024 3:25 PM
298	Same as above plus very limited growth and only built to be part of the protected envrionment.	7/14/2024 1:53 PM
299	Solar panels over parking lots to produce power and not impede other land.	7/14/2024 12:58 PM
300	Better interconnectivity between trails, parks and green spaces.	7/14/2024 12:44 PM
301	Managing traffic, don't want more traffic lights would like to prevent Sherwood from turning into the Tigard disaster of stoplights	7/14/2024 12:12 PM
302	I would like to see the region commit to developing all of the land existing within the boundary that remains undeveloped, and also develop land that is poorly used, such as the numerous seas of parking lots that remain mostly empty. I see infill as a much better use of the regions money, as urban sprawl is not what we need and will only make our city align with other sprawling cities across the country instead of setting ourselves apart as a sustainable city.	7/14/2024 11:25 AM
303	Want to see it slow down. Making infrastructure first before adding to the population. Leaving rural areas rural. Leaving room for farms. leaving the trees.	7/14/2024 11:24 AM

304	Better roads to accommodate the traffic	7/14/2024 11:19 AM
305	Less housing a few more shops/restaurants. Traffic is so bad in Sherwood. There are already too many people that it's almost impossible to go to dinner and the lines at the stores are very long.	7/14/2024 11:16 AM
306	Fixed roads	7/14/2024 10:48 AM
307	less sprawl, and more revival of already developed space	7/14/2024 10:28 AM
308	Increased safety/security	7/14/2024 10:25 AM
309	No more row housing, no more densely packed living spaces	7/14/2024 10:13 AM
310	Updates to existing and already developed land, rather than urban sprawl into precious G land.	7/14/2024 10:03 AM
311	Better infrastructure within the city (Portland proper) farmlands don’t need 500 row homes placed on them. Concrete jungle is what we are going towards and I’m not here for that.	7/14/2024 9:43 AM
312	More density and infill and less suburban sprawl. And more mixed used development. I don’t want to have to use my car to fo everything.	7/14/2024 9:25 AM
313	More affordable housing, especially for first time homebuyers and low income renters. Densify housing without losing access to safe walking and biking and community outdoor spaces.	7/14/2024 8:17 AM
314	Stop expanding the boundaries. It isn’t appropriate to overtake agricultural land.	7/14/2024 8:06 AM
315	Increase density, particularly in downtown Portland	7/14/2024 12:07 AM
316	Increased residential density in existing neighborhoods, more extensive and more frequent rapid public transit, prioritizing pedestrian and bike safety and modes of transit over automobiles. More affordability of housing and choice of housing types that meet the needs of families and older adults.	7/13/2024 10:53 AM
317	Increase in construction density and mixed use zones.	7/12/2024 11:40 PM
318	I'd like to see Portland increase it's public transportation infrastructure with rail and bus rapid transit projects. There's no reason why Portland needs to expand more outward when we can simply just densify areas. I'd like to see Portland focus on climate change initiatives and be one of the leaders in the US, and expanding the UGB and increasing the reliance on car-centered infrastructure directly opposes those initiatives.	7/12/2024 8:13 PM
319	Denser housing and neighborhoods.	7/12/2024 7:47 PM
320	Less car oriented development. It’s 2024. Climate change. We know better.	7/12/2024 6:10 PM
321	more bike and transit friendly	7/12/2024 5:31 PM
322	Better wider and marked streets.	7/12/2024 1:10 PM
323	A focus on improving the areas that are already part of the UBG	7/12/2024 12:14 PM
324	Less implementation of luxury apartment buildings that few can afford to live in, more focus on affordable housing.	7/12/2024 7:47 AM
325	Development patterns and alternative transportation, these two are intrinsically linked and, to move into more sustainable forms of transportation means moving away from single family housing as the standard. We must move towards more varied housing options to include row-houses/townhomes, apartments, condos, cottage courts, duplexes, triplexes and anything else that can provide sustainable mid-density housing. Part of providing this too includes taking a closer look at zoning requirements and doing away with unnecessarily restrictive codes including minimum setbacks, parking requirements, and anything else that holds the area back from the most sustainable development possible which includes mixed use zoning, completely separate people from every day conveniences is absurd and past development patterns have led to strip malls and big box retailers taking over, driving out small businesses in many places and further unsustainable car oriented development. Alternative transportation too must be encouraged to include transit and cycling access for all. With sustainable mid-higher density this can be achieved much easier, however metro must commit wholly, protected/separated need to be the standard in everything but the most calm residential streets, and also not reserved only for the highest speed most dangerous roads, and transit too must be as convenient as possible for all. Trimet has been making improvements, well needed ones	7/12/2024 7:15 AM

	however there is so much more that could be done, the idea of a downtown MAX tunnel has been floating for some time but if trimet ever wants to make MAX a truly viable option for further distance travel this idea must be considered further and implemented.	
326	Density and mix use land around transit corridors. Potentially look into a MUPTE like (Eugene) to spur affordable housing.	7/12/2024 12:22 AM
327	Greater emphasis on keeping Portland green as can be. It's why we love this city so much.	7/11/2024 11:52 PM
328	Building up and not out. Don't allow Portland to become like Denver, Los Angeles or other inequitable cities that can only rely on automobile transportation. Building dense cities increase access to nature for all residents.	7/11/2024 10:31 PM
329	Better mass transit. It's the only way to grow outside of Portland and not become another hell hole like LA	7/11/2024 6:57 PM
330	Minimize the role of the automobile. Stop sprawling onto new greenfield land. Revitalize existing neighborhoods. Eliminate surface parking lots of more than 1-3 spaces (in favor of on-street, underground, structured, or no parking). Build out complete, connected, safe, high-quality regional and statewide, bicycle, pedestrian, and transit networks. Complete the Coast to Gorge Trail and begin work on other elements of the Infinity Loop concept. Make cooperative housing a permanent and meaningful housing option within the region.	7/11/2024 6:12 PM
331	More high-quality transit options like regional rail and bus-rapid transit.	7/11/2024 4:27 PM
332	Better infrastructure for getting into the city core from the outskirts. Currently the only option for many is to drive but by doing so, we add to the environmental impacts and many of the routes are not very friendly. If we are going to put more family-priced housing on the edges, then we need to provide safe, economical and quicker ways to get to work and family in the city core.	7/11/2024 10:33 AM
333	Denser walkable neighborhoods, better transit, regional connection to jobs	7/10/2024 10:14 PM
334	More density in urban areas	7/10/2024 9:51 PM
335	allow cities/counties to bring in several hundred acres at their edges into development for new single-family homes with yards - like houses with one thousand square feet in foot print and 1 to 2 thousand square feet for yard. Use these edge areas to design more technological oriented cities allowing bicycle and walking to be the main way getting to a common vehicle depot for accessing other parts of the Metro area. Allow robotic, drone delivery.	7/10/2024 8:30 PM
336	Only high density housing added to any area expanding, with abundant low income housing.	7/10/2024 5:14 PM
337	Increased density, especially along transit corridors (transit oriented development), and a greater quantity of mixed-use middle density housing.	7/10/2024 12:08 PM
338	Stop expanding ugly townhouses into our beautiful countryside.	7/9/2024 9:48 PM
339	Want to see keeping original neighborhoods, use of more technology to deal with water and sewer, and more affordable housing of all types. There are cheaper more effective solutions other than a big sewerplant.	7/9/2024 3:43 PM
340	better transportation and less traffic / less need to make long trips and fewer trips / all housing will cost 30% or less of individual or family income / more natural areas and recreation	7/9/2024 3:15 PM

Q6 How do you identify your gender? (Select all that apply).

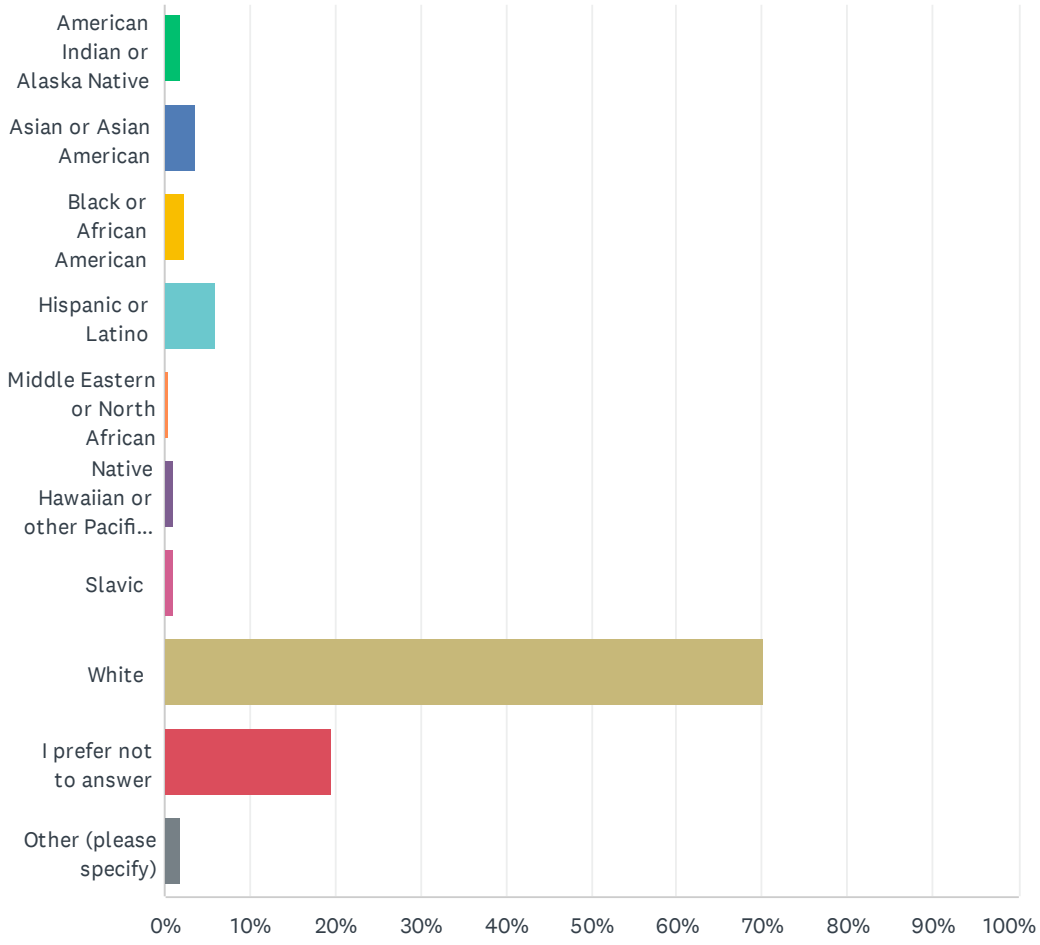
Answered: 307 Skipped: 58



ANSWER CHOICES	RESPONSES	
Female	41.04%	126
Male	43.97%	135
Non-binary	4.56%	14
I prefer not to answer	9.45%	29
Other (please specify)	1.30%	4
Total Respondents: 307		

Q7 Which of the below best describe your race/ethnicity? (Select all that apply).

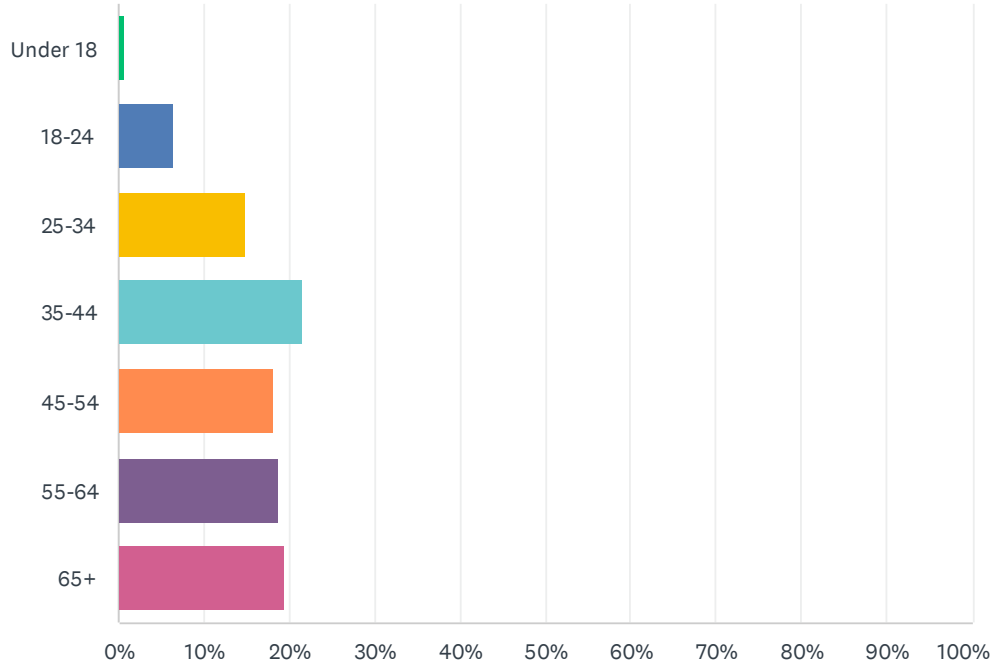
Answered: 305 Skipped: 60



ANSWER CHOICES	RESPONSES	
American Indian or Alaska Native	1.97%	6
Asian or Asian American	3.61%	11
Black or African American	2.30%	7
Hispanic or Latino	5.90%	18
Middle Eastern or North African	0.33%	1
Native Hawaiian or other Pacific Islander	0.98%	3
Slavic	0.98%	3
White	70.16%	214
I prefer not to answer	19.67%	60
Other (please specify)	1.97%	6
Total Respondents: 305		

Q8 What is your age?

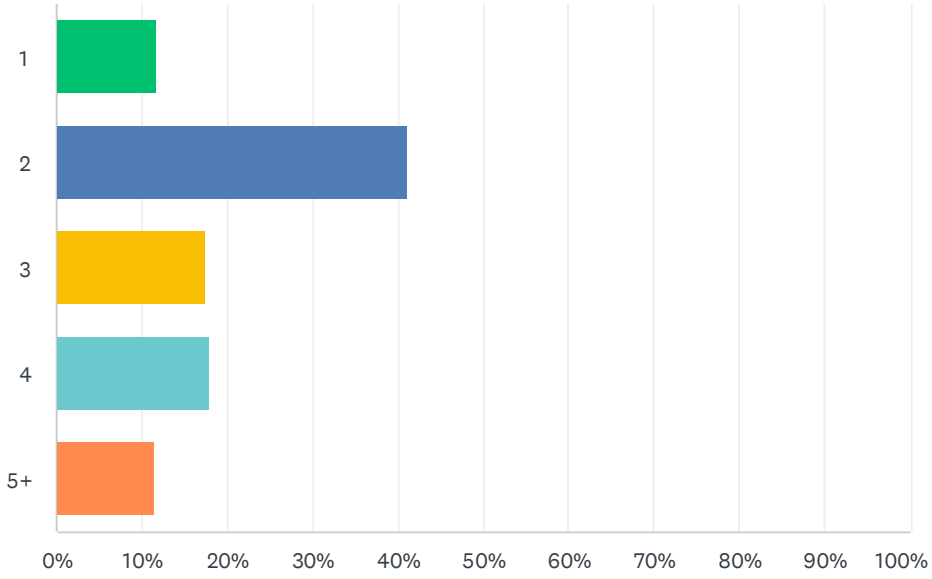
Answered: 293 Skipped: 72



ANSWER CHOICES	RESPONSES	
Under 18	0.68%	2
18-24	6.48%	19
25-34	15.02%	44
35-44	21.50%	63
45-54	18.09%	53
55-64	18.77%	55
65+	19.45%	57
TOTAL		293

Q9 How many people live in your home (including yourself)?

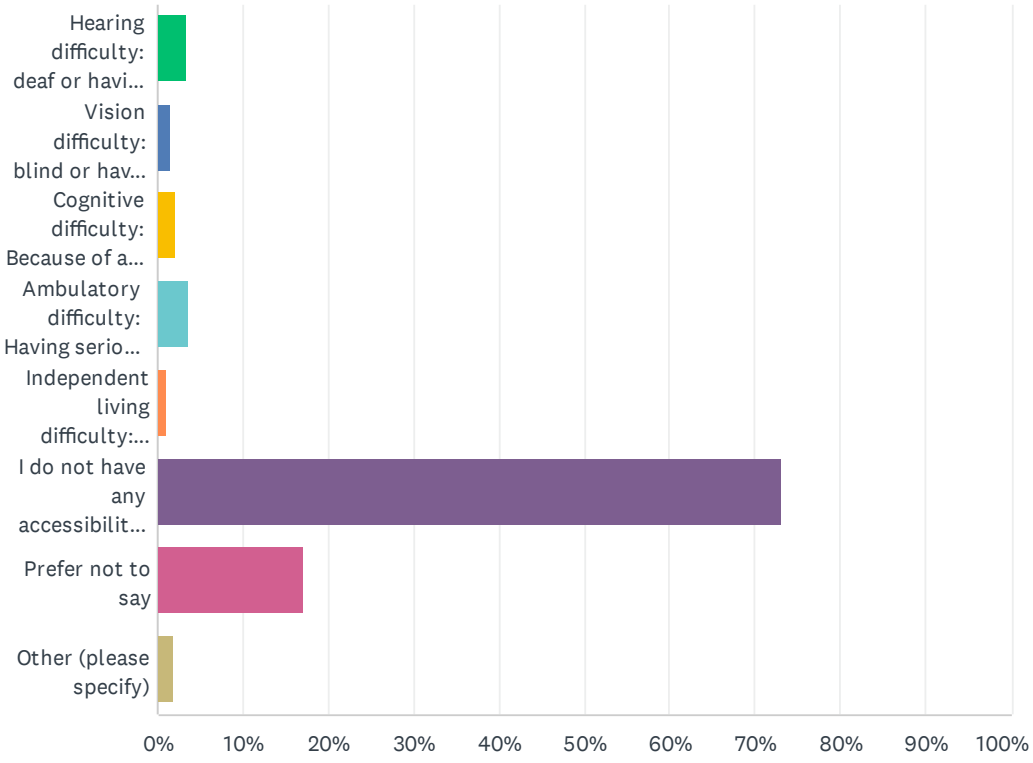
Answered: 296 Skipped: 69



ANSWER CHOICES	RESPONSES	
1	11.82%	35
2	41.22%	122
3	17.57%	52
4	17.91%	53
5+	11.49%	34
TOTAL		296

Q10 Do you have any accessibility difficulties that you would like us to be aware of? (Select all that apply).

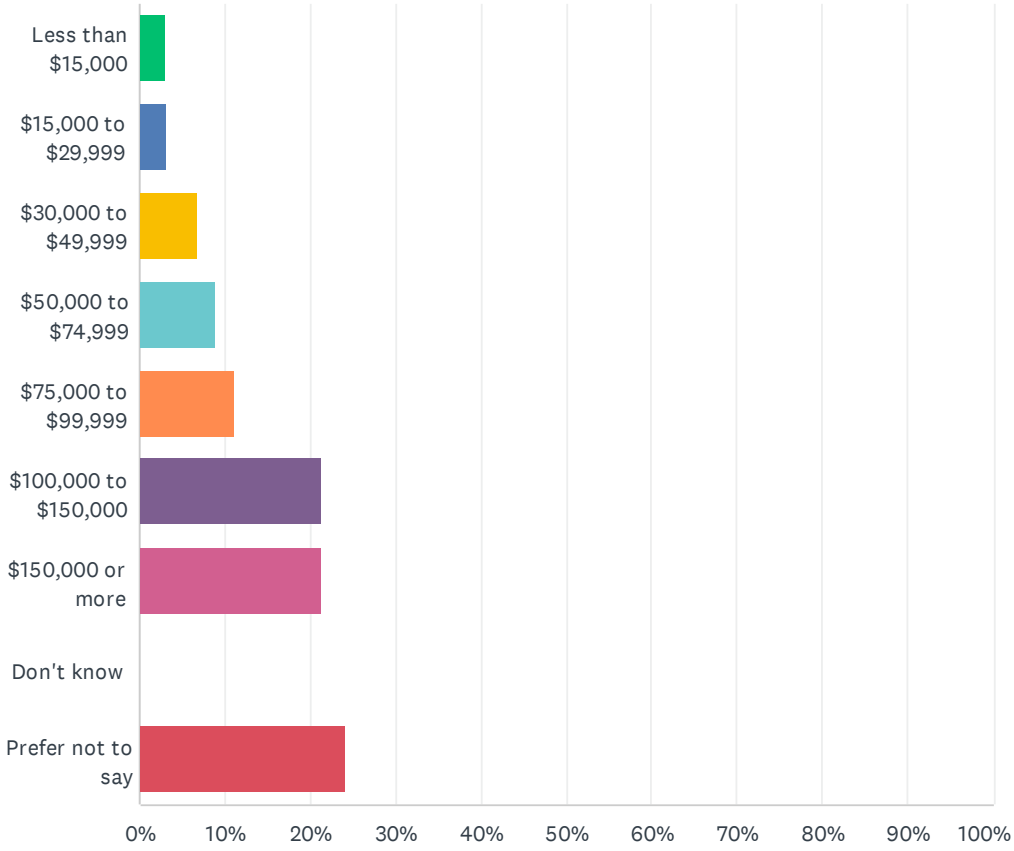
Answered: 271 Skipped: 94



ANSWER CHOICES	RESPONSES	
Hearing difficulty: deaf or having serious difficulty hearing	3.32%	9
Vision difficulty: blind or having serious difficulty seeing, even when wearing glasses	1.48%	4
Cognitive difficulty: Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions	2.21%	6
Ambulatory difficulty: Having serious difficulty walking or climbing stairs	3.69%	10
Independent living difficulty: Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping	1.11%	3
I do not have any accessibility requirements	73.06%	198
Prefer not to say	16.97%	46
Other (please specify)	1.85%	5
Total Respondents: 271		

Q11 How would you describe your income?

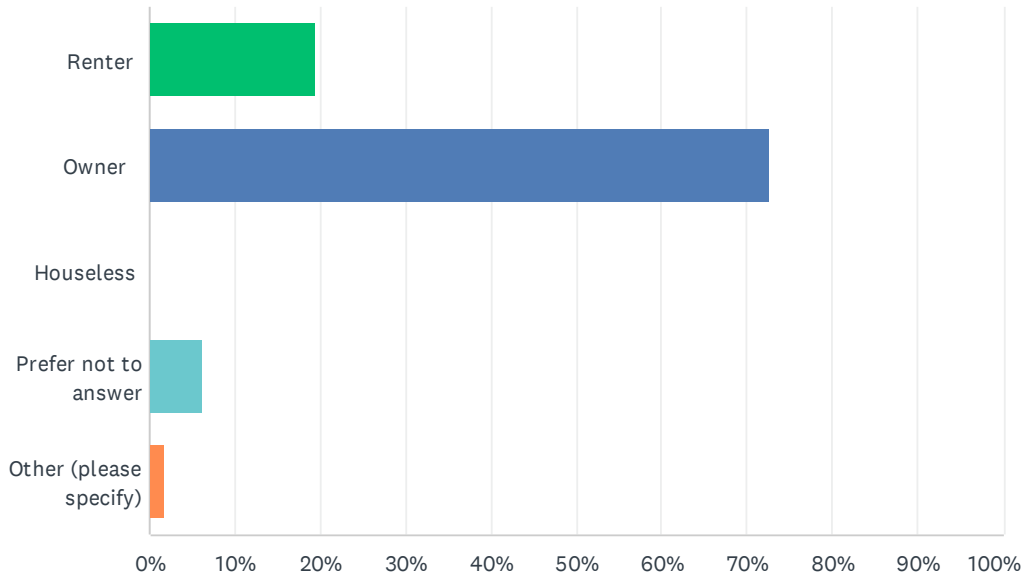
Answered: 304 Skipped: 61



ANSWER CHOICES	RESPONSES	
Less than $15,000	2.96%	9
$15,000 to $29,999	3.29%	10
$30,000 to $49,999	6.91%	21
$50,000 to $74,999	8.88%	27
$75,000 to $99,999	11.18%	34
$100,000 to $150,000	21.38%	65
$150,000 or more	21.38%	65
Don't know	0.00%	0
Prefer not to say	24.01%	73
TOTAL		304

Q12 How would you describe your housing tenure?

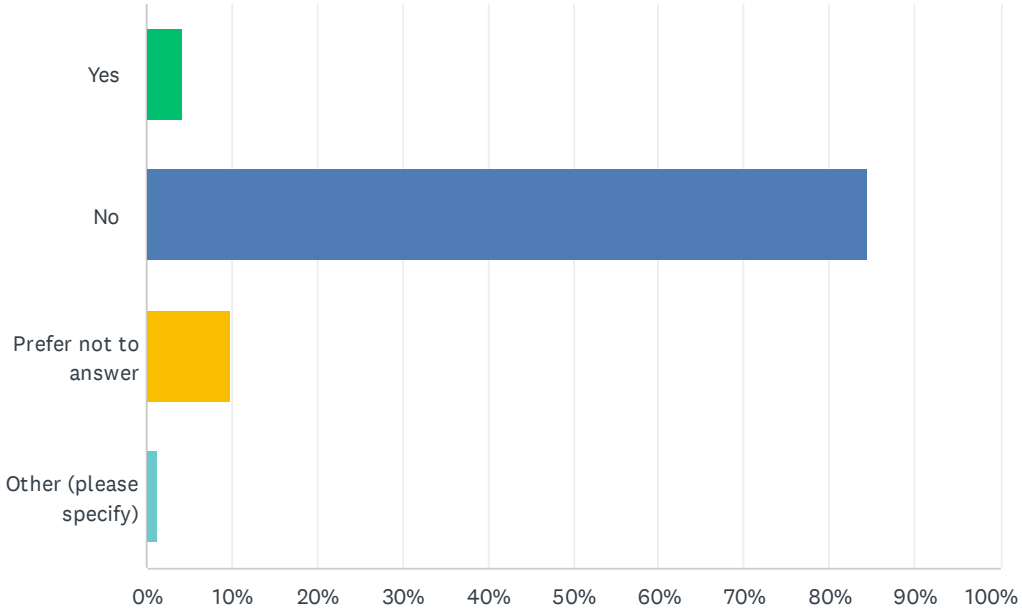
Answered: 303 Skipped: 62



ANSWER CHOICES	RESPONSES	
Renter	19.47%	59
Owner	72.61%	220
Houseless	0.00%	0
Prefer not to answer	6.27%	19
Other (please specify)	1.65%	5
TOTAL		303

Q13 Are you an immigrant or refugee?

Answered: 304 Skipped: 61



ANSWER CHOICES	RESPONSES	
Yes	4.28%	13
No	84.54%	257
Prefer not to answer	9.87%	30
Other (please specify)	1.32%	4
TOTAL		304

Q14 What is your zip code?

Answered: 284 Skipped: 81

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2	97123	8/22/2024 9:55 PM
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5	97140	8/22/2024 7:11 PM
6	97140	8/22/2024 6:56 PM
7	97201	8/22/2024 6:48 PM
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113	97205	8/11/2024 2:35 PM
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163	97140	7/24/2024 4:04 PM
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APPENDIX B

Public comment emails and letters

Miriam Hanes

From: Rachel Adams <[redacted]>
Sent: Tuesday, August 20, 2024 11:32 AM
To: Metro 2040
Subject: [External sender]Sherwood West Concept Plan Opposition

CAUTION: This email originated from an **External source.** Do not open links or attachments unless you know the content is safe.

To whom it may concern,

I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Rachel Adams

//
Play Nice PR
Rachel Adams (she/her)
[redacted]

8/21/2024

BPS Comments on July Draft of Metro Urban Growth Report (UGR)

Metro is narrowly framing this decision as to whether or not the Sherwood West expansion area should be brought into the UGB. The UGR has broader implications for the region in terms of how we expect to grow in a way that is equitable and meets other regional goals, such as reducing carbon emissions.

The Urban Growth Report (UGR) is an opportunity to frame future regional planning discussions such as the regional housing production strategy, a refresh of the 2040 Growth Concept, and a regional economic development strategy.

Our concern is that the UGR is underestimating population and housing growth, underestimating residential capacity; underestimating industrial job growth, overestimating industrial land supply and underestimating commercial land supply. BPS staff raise the following issues with methodology and assumptions to better align with regional policy objectives, which are described in detail below.

Housing

The 2044 population forecast is for much slower growth, primarily due to declining birth rates. We are concerned that the Metro forecast is too low, which will affect planning for housing that will result in insufficient housing capacity in the future. The Metro forecast is based on national growth rates – which misses the important context that, historically, Oregon has grown faster than the nation and the Portland region has grown faster than the state (captured a greater share the state's growth). The UGR lacks important comparisons to state forecasts as context for selecting a growth scenario.

Metro should select the Strong Urban Market housing mix with high population/household forecast. This scenario best fits the expected older, smaller households. It also addresses affordability concerns and the need for more affordable multi-dwelling and middle housing units. The UGR notes that 81% of future households will be financially challenged or unable to purchase homes with current median sales price at roughly $550,000 in today's dollars.

Metro's scenario results indicates that this scenario results in a deficit of 24,000 multi-dwelling units. This deficit is overstated because Metro's housing capacity methodology vastly undercounts the redevelopment potential in Portland and the region. The UGR assumes that only 20% of the most feasible properties will redevelop. Buried in a footnote, the UGR states that if redevelopment rate is increased to 40% of the most feasible properties, this deficit would be eliminated. For example, under the 20% redevelopment rate, Metro assumes that Portland only has capacity for 60,000 units. Whereas in our recently adopted 2023 Housing Needs Analysis, we found that Portland has a financially feasible development capacity of 237,000 units.

Finally, the regional forecast is not just about the UGB decision. It is used in other policy decisions (not just for managing the UGB). The housing forecast will be provided to the State (OHCS/DAS) to establish the jurisdiction level housing targets. Also, the forecast will be the basis for Metro's regional housing production strategy – which will be an important regional discussion on how to address housing needs for older, smaller households with affordability challenges.

Employment

Metro's employment forecast is tied to the population forecast. Metro's fundamental assumption that lower population growth will mean slower economic growth because access to labor will be the constraining factor could be a self-fulling prophecy. Workforce is mobile. Capital is mobile. Development

capacity is not. If the region has the land capacity for businesses to expand then workers will migrate to the region. If the region does not have the land capacity, then economic growth will be constrained.

- Jobs in the Portland MSA grew 56%-63% faster than the national economy in each of the last three business cycles (Portland EOA Trends Report). Above-average regional job growth has been supported by our competitive strengths, including growing industry clusters and planned livability that attracts talent, as recognized in our economic development strategies (CEDS, Oregon Business Plan, Advance Portland). The UGR's methodology does not account for these past trends and regional advantages. The average annual growth rate (AAGR) of Oregon Employment Department's (OED's) current 2022-2032 projection is 1.1% for Total Nonfarm Employment, compared to 0.46% in the draft UGR. Why does the UGR predict that long-term regional job growth will now slow down to the national average?
- Workforce-in-migration should be a forecast variable – Economic forecasts typically analyze sector trends, capital inputs (such as land supply), and market opportunities. Economic growth will attract workers, rather than the UGR's population-trumps-economy approach.
- Noisy in-migration data – The in-migration graph cited in the UGR indicates wide variations, rather than a hard stop for job growth. In-migration also varies widely with economic trends that don't appear to be considered in the UGR's population forecast, such as business cycles, sector growth trends, and median income trends, each of which shape in-migration through economic opportunity.
- Local sectors/traded sectors – We agree that regional population growth is an important driver of market size and job growth in 'local sectors' that serve regional markets. However, market opportunities in 'traded sectors' that serve markets outside the region are unrelated to local population size. At minimum, the UGR's connection between population growth and job projections should be removed from the goods production and distribution sectors that make up most industrial land demand and primarily serve traded-sector markets.

As with the population forecast, the UGR is lacking context or comparison to State of Oregon forecasts. The UGR also could benefit from an equity analysis that discusses the type of jobs and wages that will be available, especially for workers without 4-year college degrees.

The region needs a land supply strategy that includes a deeper analysis of sector and business growth opportunities and how they match with the region's employment land supply in order to create equitable economic opportunity.

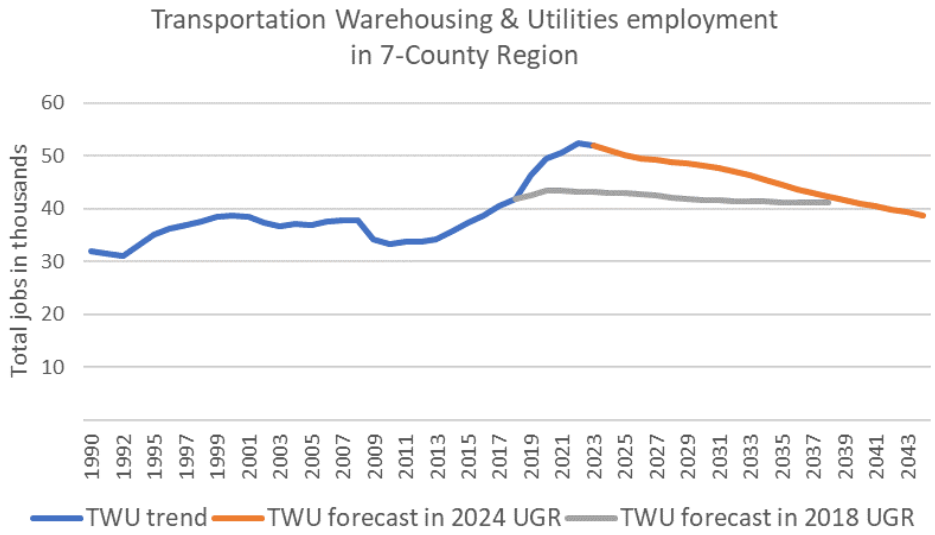
Industrial

Inadequate Industrial Land Supply – The UGR widely understates industrial land demand, relative to growth trends and State of Oregon employment projections. It overstates the suitable land supply to meet the region's distinct segments of demand. Coming to the opposite conclusion of the UGR, the private market has found inadequate industrial land supply since around 2015, evident in the region's low industrial vacancy rates and rising rents of the last decade. What is Metro's rationale for such a different and low industrial demand forecast?

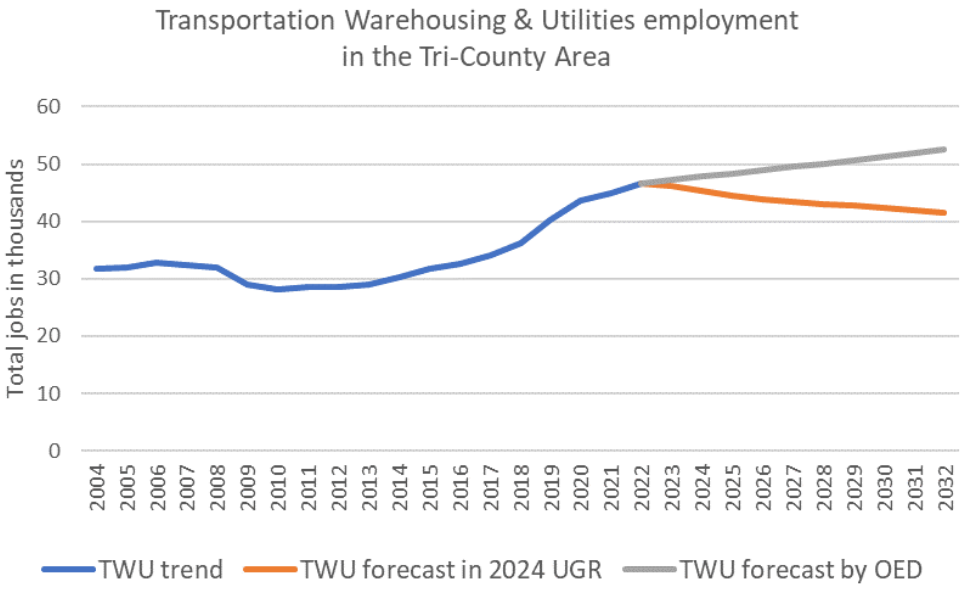
Transportation & Warehousing (Logistics) forecast – Metro's no-growth forecast for the logistics sector in the 2018 UGR and the declining forecast in 2024 UGR eliminates most of industrial land demand. Metro's industrial employment sector forecast is too low and not consistent with Oregon Employment Department (OED) forecasts. Specifically, BPS staff has raised concerns about the forecasted decline in

the warehouse and distribution sector when the OED and the federal Bureau of Labor Statistics (BLS) forecast continued growth. Metro made a similar assumption in 2018, when it forecasted zero-growth for logistics jobs, when, since 2015, it has been a high job-growth sector and the region's predominant employment land demand.

- The current UGR forecast for major decline in Logistics jobs is the opposite of its rapid growth trend in the last decade and current national/state/regional employment agency forecasts for continuing above-average growth, as shown in the charts below. Metro's regional projection of -1.4% annual change (AAGR) in Transportation Warehousing & Utilities jobs over the next decade (2022-2032) compares to 0.8% AAGR by Bureau of Labor Statistics nationally and 1.2% AAGR by OED in the Tri-County area. City staff would be interested in better understanding this aspect of the analysis and discussing the potential associated regional policy implications.



Sources: Trend from CES data by BLS. Forecast data by Metro in 2018 and draft 2024 Urban Growth Reports



Sources: Trend data from CES by OED. UGR forecast from July 2024 draft by Metro. Oregon Employment Department projections for 2022-2032.

- Logistics is a critical sector to get right in the UGR forecast, because Logistics businesses are the primary source of Warehouse & Distribution development (along with Wholesale Trade) and thus industrial land demand. Warehouse & Distribution buildings made up 75% of the MSA's total occupied industrial space in 2019 and 93% of the new occupied space in the recent 2008-2019 business cycle (CoStar data).

3,600-acre demand discrepancy for Logistics and Manufacturing – The draft UGR forecast for 1,400 additional industrial acres to 2044 is undercounting regional demand by about 3,600 acres relative to OED's regional projections in the Logistics and Manufacturing sectors alone (see table below). The sector-trends methodology of OED's projections is a better fit for employment land planning because of its consistency with employment and development trends and with State Planning Goal 9 requirements for trends-based forecast.

Estimated Tri-County forecast discrepancy in industrial land demand between Metro's draft 2024 UGR and Oregon Employment Department's 2032 projections						
	Forecast AAGR	Tri-County Jobs in 2024	Jobs in 2044	2024-2044 Job Change	Building SF	Land (ac.) Demand
Transportation Warehousing & Utilities						
Metro Draft UGR 2024	-1.4%	45,200	34,300	-10,900	-16,639,900	-1,273
OED, 2032 projections	1.2%	47,600	60,700	13,100	19,998,500	1,530
Discrepancy				24,000	36,638,400	2,804
Manufacturing						
Metro Draft UGR 2024	0.1%	101,400	102,900	1,500	1,037,600	72
OED, 2032 projections	0.8%	102,900	120,900	18,000	12,451,300	866
Discrepancy				16,500	11,413,700	794
Total Discrepancy				40,500	48,052,100	3,598

Automation impacts - Metro staff has offered automation as a reason for slower job growth in Logistics and Manufacturing. Other sources support different conclusions. After accounting for automation

impacts, current BLS national projections (which inform OED's regional projections) conclude that Logistics will continue to grow jobs substantially faster than the overall economy. BLS projections also indicate substantially higher output growth than employment growth in Logistics and Manufacturing, which in turn indicates increased land demand. Automated warehouses and factories still need land, and productivity gains of automation support higher land demand. Like BLS, McKinsey's projected job impacts of automation in urban areas indicate losses mainly in office support occupations, modest losses in manufacturing production, and gains in transportation occupations: Future of work in America | McKinsey. Considering the example of self-driving trucks, an extensive USDOT study in 2021 found "vast uncertainty" in future labor market impacts, including losses and gains over several decades with net impacts difficult to predict.

Other underestimated sources of industrial demand – In addition to the growth rate discrepancies for logistics and manufacturing, the UGR underestimates demand in a variety of other ways.

- Business-cycle impacts – Long-term sector growth rates span the job losses and gains of business cycles. In contrast to the predominantly industrial-sector job losses in the region's three previous recessions, the combined industrial sectors were the least impacted in recent COVID recession. The UGR misses this major source of long-term industrial growth by starting the forecast period in 2024, which particularly understates the long-term trend in Logistics.
- Target cluster incentives - The expanded growth potential of target industry clusters, supported by economic development policies and business assistance and incentive programs, is another example of undercounted demand. For example, the region's Cleantech and Electronics clusters are expected to broadly benefit from the 2022 federal industrial policy incentive of the Inflation Reduction Act and Chips Act.

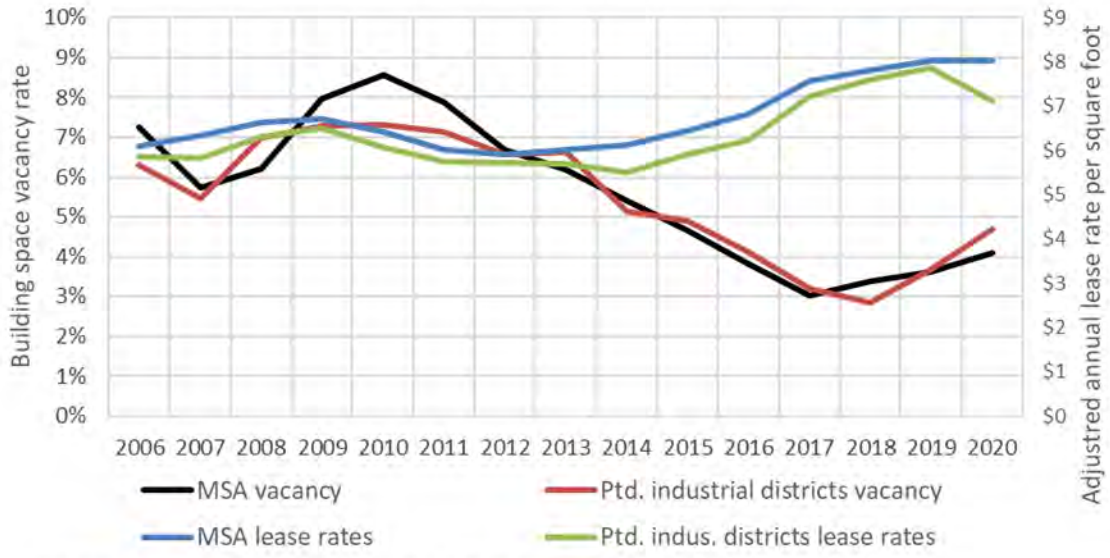
Overstated industrial land supply – While the UGR's industrial land supply for Portland (1,200 acres) is relatively consistent with BPS' preliminary estimate, we are concerned that Metro has overestimated the industrial land supply in the rest of the region in a variety of ways.

- Suitable supply for location-specific demand – The UGR does not track land demand nor supply based on location-suitability criteria or a regional trend analysis by business district type. Instead, the UGR appears to assume that industrial land supply is loosely substitutable across the region. This is not the case when businesses make location decisions. The largest discrepancy is the concentration of the region's Logistics and Wholesale jobs in industrial districts near interstate highways and multimodal freight infrastructure. Some of the region's Warehouse & Distribution land demand is substitutable at dispersed locations, but most of it is not. For example, the City of Portland has 73% of tri-county Logistics jobs, but Portland's freight-hub districts are building out. Portland's 2016 EOA and current industrial land supply studies raise concerns about Portland's tight industrial land supply and ability to meet future demand in these freight-hub districts. The UGR lacks the detail in location needs for different industrial sectors and region's ability to accommodate their growth or the consequences of failing to meet the demand (sprawl to exurban areas).
- 10-acre and larger lot demand – The UGR does not appear to compare land demand and supply by site size. We are concerned that the region has an inadequate supply of 10-acres or larger sites. Larger sites made up 68% of new industrial construction in Portland in the last business cycle. While industrial land demand is present across the site-size distribution, our preliminary

land demand and supply analysis shows the potential for several hundred acres of unmet demand for sites 10 acres and larger in Portland, which are businesses that will seek locations elsewhere in the region (or outside the region).

- Industrial land readiness investment – A third major example of over-stated industrial land supply in the URG is the region's underfunded needs for industrial land readiness. Metro's Industrial Land Readiness toolkit clarifies this issue in detail.
- It is unclear if Metro's methodology adequately accounts for constraints on development for factors such as brownfields, small parcel sizes (less than 0.5 acres); and steep slopes. These factors contribute to overstating the effective supply.

Misreading the tight industrial land supply – BPS is concerned that the UGR sends the wrong message (finding more than adequate industrial land supply) at time of low vacancy rates and increasing rents and land values. The region's traded sector economic base that drives regional prosperity relies primarily on industrial land. The UGR could drive complacency that will undermine long-standing regional economic development goals. Market-effective industrial land supply has been tight in the region since 2015 (see chart below), as building vacancy rates dropping below 5% have pushed up rents to less competitive levels for growth. In turn, the metro area's tight land supply generates sprawl beyond the region. A Colliers' 2023 report on the 'I-5 OR/WA logistics corridor' (see link) identifies 62 industrial projects under construction last year that span the Portland and Seattle metro areas and the I-5 corridor between them.



Source: BPS from CoStar data; annual inflation-adjusted rates (2020 $)

Recommendations – BPS made similar comments about the 2018 UGR that were not taken into account. The UGR employment land methodology needs rethinking.

- Trend-based forecast scenario – The draft UGR employment forecast and capacity analysis is used for other purposes, such as economic development strategies and public and private investments, that go beyond the immediate decision on the UGB. Metro should acknowledge Oregon Employment Department's current sector projections for the Tri-County Area as a UGR forecast scenario that is primarily based on sector trends and not tied to Metro's population

forecast. The average annual growth rate (AAGR) of OED's current 2022-2032 projection is 1.1% for Total Nonfarm Employment, compared to 0.4% in the draft UGR. OED's projection methodology more closely fits the market-trend approach required of cities and counties by Oregon's Goal 9 for employment land planning.

- Rethink UGR employment forecast and capacity analysis - the next (2030) UGR should better align with Oregon's Goal 9 requirements for adequate employment land capacity, estimating demand from market trend opportunities of employment land types, substantially delinked from the population forecast. It should address Goal 9 requirements to analyze land supply and demand by employment land type and to analyze supply and demand by site size for each land type.
- Regional growth capacity strategy – Metro should lead work to prepare a market-responsive regional land-supply strategy to meet industrial demand in suitable locations. This work should be completed to inform the next UGR. It should include analysis and recommendations for industrial land readiness funding and Urban Reserves expansion in market-responsive locations. Current inventory gaps include predominant demand for 10+ acre sites and lack of capacity in near interstate highways or multimodal freight infrastructure. Additionally, cities and counties lack financial resources to overcome development barriers on sites in the existing industrial land supply.

<u>Commercial</u>

Commercial employment forecast appears to be reasonable, but the UGR is missing key details on office/retail/institution sector allocations and resulting demand that are needed to make an informed decision.

Please consider adjusting the commercial land supply analysis and methodology. Metro's backcasting redevelopment probability discount rates drastically reduces commercial development capacity. The proforma financial feasibility methodology is biased towards residential development, which does not adequately account for a residential/commercial split based on recent development trends. Finally, the methodology does not account for intensification of existing businesses/buildings. In the face of increased demand, businesses will add employees/shifts, expand hours and otherwise use existing building space more efficiently and increase productivity without increasing land demand.

The underestimating of commercial land capacity leads to the erroneous conclusion that the region has a deficit of commercial land.

<u>Sherwood West</u>

The UGR needs additional information on how the expected residential, industrial and commercial capacity increases in the Sherwood West area will help meet regional needs.

Generally, the city of Portland is a proponent of infill and redevelopment within the UGB and bases considerations about UGB expansions on their ability to promote urban growth patterns that fulfill the regional policy objectives of equity, housing affordability, economic opportunity and reducing carbon emissions. Those considerations include UGB expansions that:

- Promote and accommodate housing options that include middle housing and higher density multi-dwelling and/or mixed use developments;

- Address the regional need for affordable housing for a wide range of households;
- Create a land use pattern (20+ units per acre) that can be cost effectively served by transit and active transportation; and
- Accommodate large site industrial uses with protections in place to prevent conversion to non-industrial uses.

As proposed, the Sherwood West concept plan does not meet these criteria. The housing element is low-density, expensive housing with minimal opportunities for middle housing with no affordable housing strategy and will not serve the region's future housing needs or address its affordability challenge. The commercial development in the form of wine country hospitality (with no supporting plan to provide affordable housing for workers) is inappropriate to meet the regional commercial land needs. The employment area is promising but various references to "mixed" employment raise concern that the large lot industrial opportunity will not come to fruition. The employment area should be designated on Metro's Title 4 map as a Regionally Significant Industrial Area and not subject to conversion or leakage to commercial uses. Finally, the concept plan lacks an equity analysis and any discussion on how it can address racial income disparities in the region.

Equity analysis

Metro's equity analysis is limited to a look back at UGB expansion areas in Happy Valley and Bethany. These case studies lack comparison to the region as a whole and consideration of household income levels and are not representative of or informative as to how this analysis reflects a regional perspective.

There is no equity analysis of the regional forecast and land capacity analysis – both in terms of housing and employment opportunities. Nor is there any equity analysis of the Sherwood West expansion area and how it can address racial income disparities in the region.

Miriam Hanes

From: Eryn Kehe
Sent: Thursday, August 22, 2024 8:36 AM
To: Miriam Hanes
Subject: Fwd: BPS comments on the draft UGR
Attachments: Metro Urban Growth Report BPS comments 08.21.24.pdf

Miriam,

More UGR comments.

Eryn Deeming Kehe, AICP
She / her
Urban Policy and Development Manager
Metro

From: Armstrong, Tom <[redacted]>
Sent: Wednesday, August 21, 2024 5:21:23 PM
To: Catherine Ciarlo <[redacted]>; Malu Wilkinson <[redacted]>; Eryn Kehe <[redacted]>; Ted Reid [redacted]; Josh Harwood [redacted]
Cc: Kountz, Steve [redacted]; Diefenderfer, Patricia [redacted] Emerald Bogue <[redacted]>; Bouillion, Tom <[redacted]>
Subject: [External sender]BPS comments on the draft UGR

CAUTION: This email originated from an **External source.** Do not open links or attachments unless you know the content is safe.

Thank you for the opportunity to meet and provide feedback on the draft UGR. As a follow up to our recent meeting, we would like to share these summary comments to help inform your COO recommendation. Also attached is additional detailed feedback on specific topics.

BPS' feedback is focused on the broader policy implications of growth projections beyond the implications for the pending UGB expansion proposal. Our request is that Metro consider those broader policy implications for the region in terms of how we expect to grow in a way that is equitable and meets other regional goals, such as housing affordability, equitable economic opportunity and reducing carbon emissions, when considering its recommendations to the Metro Council.
Overarchingly, by basing the regional forecast on national forecasts, the UGR is missing the important context that, historically, Oregon has grown faster than the nation and the Portland region has grown faster than the state.

While we agree that population will grow slower than in the past, we are concerned that the Metro forecast is too low, which will affect planning for housing that will result in insufficient housing capacity that will continue to exacerbate our housing affordability challenges. Metro should select the Strong Urban Market housing mix with a high population/household forecast to ensure that future growth

patterns reinforce the goals to have compact development and provide a wide range of housing types to accommodate changing socio-economic demographic factors. This scenario best fits the expected trends for older, smaller households. It also addresses affordability concerns – the future need will be for multi-dwelling and middle housing units. Eighty-one (81%) of future households will be financially challenged or unable to purchase homes with current median sales price at roughly $550,000. Metro can select this scenario without creating the need for a massive UGB expansion by adjusting the redevelopment rate in the development capacity model (see attached detailed comments).

The consequence of not planning for population growth is that it will likely constrain the state and region's economic growth. The assumption that that lower population growth will mean slower economic growth because access to labor will be the constraining factor will serve as a constraint to future economic growth and expansion. Given post-Covid trends, we know that the workforce and capital are mobile. If the region has the land capacity for businesses to expand then workers will migrate to the region. If the region does not have the land capacity, then economic growth will be constrained. The Oregon Office of Economic Analysis proscribes a similar practice (page 32) - Oregon's economic condition heavily influences the state's population growth. It is economy that determines the ability to retain existing work force as well as attract job seekers.
Similarly, our concern is low industrial job projections could also serve to constrain economic development potential in the state and the region over the longer term. Projecting low industrial employment and identifying an "oversupply" of industrial land could undermine longstanding city and regional efforts to make investments (brownfield clean up and infrastructure investment) that will make industrial land ready for development. The message that the region has an abundant supply of industrial land could dissuade decisionmakers and leaders from difficult decisions and prioritizing the investments needed to realize that economic opportunity. The net result will be a lack of middle wage job opportunities that will advance city and regional equity and climate goals. The UGR assumptions for industrial job growth vary widely relative to regional growth trends and State of Oregon employment projections. The UGR comes to the opposite conclusion of the private market, which has found inadequate industrial land supply since around 2015, as evident in the region's low industrial vacancy rates and rising rents and land values of the last decade. As it relates to the commercial land supply, Metro's redevelopment probability discount rates and a bias towards residential development drastically reduces the commercial development capacity. For example, Metro finds that Portland has 34 acres of commercial capacity, whereas BPS' analysis finds that figure to be 500 acres.

Generally, the city of Portland is a proponent of infill and redevelopment within the UGB and bases considerations about UGB expansions on their ability to promote urban growth patterns that fulfill the regional policy objectives of equity, housing affordability and reducing carbon emissions. Those considerations include UGB expansions that:

- Promote and accommodate housing options that include middle housing and higher density multi-dwelling and/or mixed-use development;
- Address the regional need for affordable housing for a wide range of households;
- Create a land use pattern (20+ units per acre) that can be cost effectively served by transit and active transportation; and
- Accommodate large site industrial uses with protections in place to prevent conversion to non-industrial uses.

As proposed, the Sherwood West concept plan does not meet these criteria. The housing element is low-density, expensive housing with minimal opportunities for middle housing and no affordable housing strategy and will not serve the region's future housing needs or address our affordability challenge. The commercial development in the form of wine country hospitality (with no supporting plan to provide affordable housing for workers) is inappropriate to meet the regional commercial land needs. The employment area is promising but various references to "mixed" employment raise concern that the large lot industrial opportunity will not come to fruition. The employment area should be designated on Metro's Title 4 map as a Regionally Significant Industrial Area and not subject to conversion or leakage to commercial uses. Finally, the concept plan lacks an equity analysis and any discussion on how it can address racial income disparities in the region.

The Urban Growth Report (UGR) is an opportunity to frame future regional planning discussions such as the regional housing production strategy, a refresh of the 2040 Growth Concept, and a needed regional discussion on economic development land needs that go beyond the technology sector.

We look forward to continuing this discussion.

Tom Armstrong, Supervising Planner
he/him
City of Portland Bureau of Planning and Sustainability
[redacted]

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact at [redacted] or use City TTY [redacted].

-----Original Appointment-----
From: Metro Planning, Development and Research Calendar <[redacted]>
Sent: Wednesday, July 24, 2024 1:50 PM
To: Metro Planning, Development and Research Calendar; Emerald Bogue; Kountz, Steve; Armstrong, Tom; Bouillion, Tom; Catherine Ciarlo; Wilkinson, Malu; Eryn Kehe; Ted Reid; josh.harwood; Dennis Yee; David Tetrick; Diefenderfer, Patricia
Subject: UGB follow up (Port/Metro/City of Portland)
When: Tuesday, August 6, 2024 2:30 PM-3:30 PM (UTC-08:00) Pacific Time (US & Canada).
Where: Teams/virtual

Thank you for making time for this meeting to follow up on draft Urban Growth Report technical questions. (Adding Patricia Diefenderfer to this meeting per Catherine's request.)
Below is a draft agenda:

- Welcome and introductions
- Project schedules
  - Growth management schedule
  - 2040 Future Vision schedule
  - Distributed forecast schedule

- City of Portland and Port concerns
- Next steps

Kind regards,
Lisa Hunrichs (she, her)
Executive Assistant to the Director and Deputy Director
Metro Planning, Development, and Research
Cell: [redacted]

Miriam Hanes

From: Ted Reid
Sent: Friday, April 5, 2024 3:26 PM
To: [redacted]
Cc: 2040
Subject: RE: Sherwood West

Hi Dave,
You are correct that the City of Sherwood has submitted a proposal for adding the Sherwood West urban reserve to the urban growth boundary. I can't speculate on what the Metro Council's decision will be. Under state law, they can only add land to the UGB if there is a demonstrable regional need for it. We have not yet completed that analysis, which will be released in draft form in late June. Sorry I can't be of more assistance at this time.

Thanks,
Ted

Ted Reid
Principal Regional Planner
Planning, Development and Research Department

Metro | oregonmetro.gov
600 NE Grand AVE
Portland, OR 97232-2736

[redacted]

From: Dave Balfour <[redacted]>
Sent: Thursday, April 4, 2024 4:13 PM
To: 2040 <[redacted]>
Subject: [External sender]Sherwood West

CAUTION: This email originated from an **External source.** Do not open links or attachments unless you know the content is safe.

Good afternoon,

I am working with the City of Sherwood and Clean Water Services on some land valuations in the Sherwood West expansion area.

It is my understanding that Sherwood is submitting to Metro the Sherwood West concept plan (attached) to Metro in a request for UGB expansion this year (2024).

I am hoping to report in my appraisal the likelihood or probability of Metro expanding UGB. I understand nothing is definitive, but I also want to know if there is a strong chance that the UGB expansion could be denied.

Thanks for your time. Feel free to call.

Dave

David E. Balfour, MAI
President, Portland Valuation Group, Inc.
Certified General Appraiser
Phone: [redacted]
[redacted], Sherwood, OR 97140

DOING BUSINESS AS:

OREGON VALUATION GROUP

THE VALUATION GROUP
[redacted]
Sherwood, Oregon 97140
Voice: [redacted] [redacted]

Metro Council
600 NE Grand Ave
Portland, OR 97232

August 20, 2024

Re: Sherwood West Concept Plan Proposal

To Whom It May Concern:

My name is David Balfour, and I am a Commercial Real Estate Appraiser and am also a resident of Sherwood. As such, I would like to document my **support** to approve the Sherwood West Concept Plan as proposed by the Sherwood Planning Department as both a commercial real estate expert and a community member.

As an appraiser and investor, the Sherwood market has historically exhibited extremely limited employment land supply. While performing appraisal work and comparing real property sales in Sherwood, Tualatin, Wilsonville, Hillsboro, Beaverton, and other communities, it is consistently evident that Sherwood is the most constrained in terms of land supply as well as building supply. This creates barriers to market entry for tenant business owners. As an appraiser and investor, I believe my experience in these markets qualify me to understand the supply and demand constraints as well as the economic opportunity for the community of Sherwood (and the Portland Metropolitan Area as a whole). It should be noted that I have been monitoring the following potential expansion areas outside of Sherwood West:

- While there are lands in Hillsboro that were approved for industrial expansion, I personally have worked on +/-30 projects in that area over the past 18 months and know that every parcel is spoken for by a developer or users (all the way out to Jackson School Road where the UGB boundary lies). Thus, Hillsboro does not provide a substantive supply relief option.
- North Plains voters rejected expansion plans in May 2024, again providing no relief to the Portland Metropolitan area's industrial land shortage.
- On the east side, there are many transportation projects and funding constraints preventing parcels along Highway 212 from development based upon information I have gathered from multiple appraisal assignments. Again, the east side of Interstate 5 does not provide substantive supply relief options.
- Furthermore, it is frustrating to watch the growth that Vancouver and Clark County are experiencing (and benefiting) from our businesses and companies relocating across the Willamette River for a variety of reasons including supply constraints. While that Southwest Washington submarket is soaring, the Portland Metropolitan area is losing business, jobs, and tax revenue which I believe can be partially offset by suburban land supply creation in Sherwood West.

- I want to point out that supply is constrained with hardly any fully served industrial sites. I was shocked to recently observe offers on a property that would take +/-5 years to simply perform site work (grading and utilities) to bring online for building construction.

Similarly, Sherwood has a shortage of residential housing supply which results in the available supply being significantly priced (upward pressure) and therefore unaffordable to many. I am a paid SSD employee (Football Coach) and volunteer on the Sherwood Youth Football Association Board where I hear from many parents that home pricing in Sherwood is extreme and prevents friends and family from moving to the area. Considering the planning and positioning of the Sherwood School District (which is one of the best in the state) to provide facilities that can accommodate substantive student growth, as well as surrounding lands that can support residential development, it is critical to increase residential land supply to maximize the Sherwood School District facilities and alleviate residential housing price affordability.

Lastly, and most critically, the recent roadway infrastructure improvements at two of Sherwood primary intersections (Sunset Blvd/Elwert Rd/Highway 99W and Roy Rogers Rd/Tualatin-Sherwood Rd/Highway 99WW) as well as the commuting routes of Roy Rogers Road and Tualatin-Sherwood Road, position both employment and residential users to benefit from urban expansion areas.

In closing, I believe that the community is well positioned from an infrastructure standpoint to support these expansion plans. Furthermore, expansion as proposed will strengthen the existing community and provide a highly desirable opportunity to work/live for the Portland Metropolitan area.

Therefore, I urge the Metro Council to approve the Sherwood West Concept Plan as proposed. Thank you for reading my testimony, your consideration of this matter is very much appreciated.

Sincerely,

David E. Balfour, MAI
[redacted]
Sherwood, OR 97140
Email: [redacted]
[redacted]

Miriam Hanes

From: Dave Balfour <[redacted]>
Sent: Tuesday, August 20, 2024 1:23 PM
To: Metro 2040
Subject: [External sender]Sherwood West Concept Plan Proposal - Written Testimony
Attachments: Dave Balfour Written Testimony.pdf

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Hello,

Please see my written testimony regarding the Sherwood West Concept Plan Proposal. Let me know if you have any questions or need additional information.

David E. Balfour, MAI
The Valuation Group
[redacted]
Sherwood, Oregon 97140
P: [redacted]
This message was sent via voice text. Please forgive typographical errors.

Miriam Hanes

From: Brittni Beers <[redacted]>
Sent: Thursday, August 15, 2024 6:19 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]Opposition to Sherwood West UGB Expansion

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Brittni Beers-Branco

Sent from my iPhone

Miriam Hanes

From: Hella Betts <[redacted]>
Sent: Friday, January 26, 2024 11:08 AM
To: 2040
Subject: [External sender]Metro decision on a UGB expansion request end of this year (2024) Sherwood, OR

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Good Morning Metro:

As a property owner of 13 acres on 19945 & 19525 SW Kruger Rd, Sherwood, Or - outside of the UGB, I strongly support to be included in the UGB. We are directly behind the new Sherwood High School with a "turn around intersection of Elwert and Kruger which causes traffic going from Newberg to Hillsboro. The congestion from the High School Literally makes the case for growth, road improvement, local businesses so students do not have to use cars to cross 99W. Sherwood is the "gateway to the coast and wine country" it would be SAD to be like Tigard and just be a "drive though".

This also could be a promotion advertising to come to "OREGON as a DESTINATION".

Thank you,
Hella Betts
[redacted]
Sherwood, OR 97140

August 9, 2024

Metro Councilor Christine Lewis
(via email)

Dear Councilor Lewis:

I am writing on behalf of the Borland Property Owners Association, which represents owners located along I-205 and south of the Tualatin River (map attached) – and which has been in "Urban Reserves" for many years. It is part of the largest area within Metro's boundary that is Urban Reserves, and it is the only formerly Tier 1 Urban Reserve not yet within a UGB. Our comments focus on the need for housing, recognizing that there also is a significant market need for business/industrial land.

Metro's Draft Urban Growth Report (DUGR) as presented to Council is not merely a statistical exercise. It is in fact a package of major policy decisions that should be rigorously discussed by the Council in open, regularly scheduled Council meetings and only after that voted upon.

The DUGR appears against a backdrop of what is widely described as a housing crisis: A shortage of tens of thousands of units of housing that is affordable to working Oregonians, as well as a severe shortage of housing accessible with either direct or indirect subsidies.

In summary, we have a large supply-demand imbalance. Lack of supply has driven Portland-area costs well above comparably sized, successful cities. For example, based on National Association of Realtors sale price data from Q1 2024 (attached):

- Charlotte, North Carolina, is about 10% larger than Portland but its housing costs are about 20% less.
- Pittsburgh is of comparable size and its housing costs are about 42% of those of Portland.
- Even Phoenix, Arizona, is nearly twice Portland's size by population and yet its housing costs are about 10% less.

All these areas are prosperous, desirable places to live – and are more affordable than Metro Portland.

This crisis prompted Metro to go to the ballot and get approval for an income tax to pay for housing subsidies, and it has prompted the Legislature and Governors to collaborate on passage of major housing measures in recent years.

And yet there has been little movement of Metro-controlled urban growth boundaries, the most tangible means by which Metro can increase the supply of legally buildable land and by doing so mitigate costs. If we really are in the midst of a housing crisis, then moving UGBs should be part of the action plan to counter it.

[redacted] Portland, Oregon 97229 [redacted] · [redacted]

Our problem has become a negative flywheel feeding on itself: Excessive costs discourage in-migration necessary to make up for the macro trend of an aging native population, primarily driven by the Baby Boom generation and decreasing family sizes among following generations. An aging population leads toward economic stagnation and limited opportunity for the working-age population.

While Metro cannot realistically change the macro aging trend among the native population, in-migration is well within Metro's policy influence. It is not merely a matter of picking a high, medium, or low in-migration projection. *The policy choice before the Metro Council is whether to encourage in-migration*. It can do so by greatly expanding the supply of housing land.

The DUGR also makes highly questionable assumptions about acceptable density. While noting that younger people are willing or even desire to live in dense multifamily housing, it fails to note that many of today's 20-somethings soon will be 30-somethings with young families seeking single-family homes with a yard. If Metro expands UGBs now, then the housing they likely will desire could be reasonably available within 10 years.

The report also notes increasing amounts of dense or attached single-family housing such as multistory townhouses, and projects proportionately more such housing *without acknowledging the growing need of the older component of the population for single-level housing*.

Metro has a responsibility to meet these needs, which cannot be met entirely by infill and redevelopment. It cannot meet its responsibility to provide for sufficient legally developable land by merely ratifying a report that, despite its earnest statistical analysis, is a series of guesses tilted toward a slow- or no-growth policy choice.

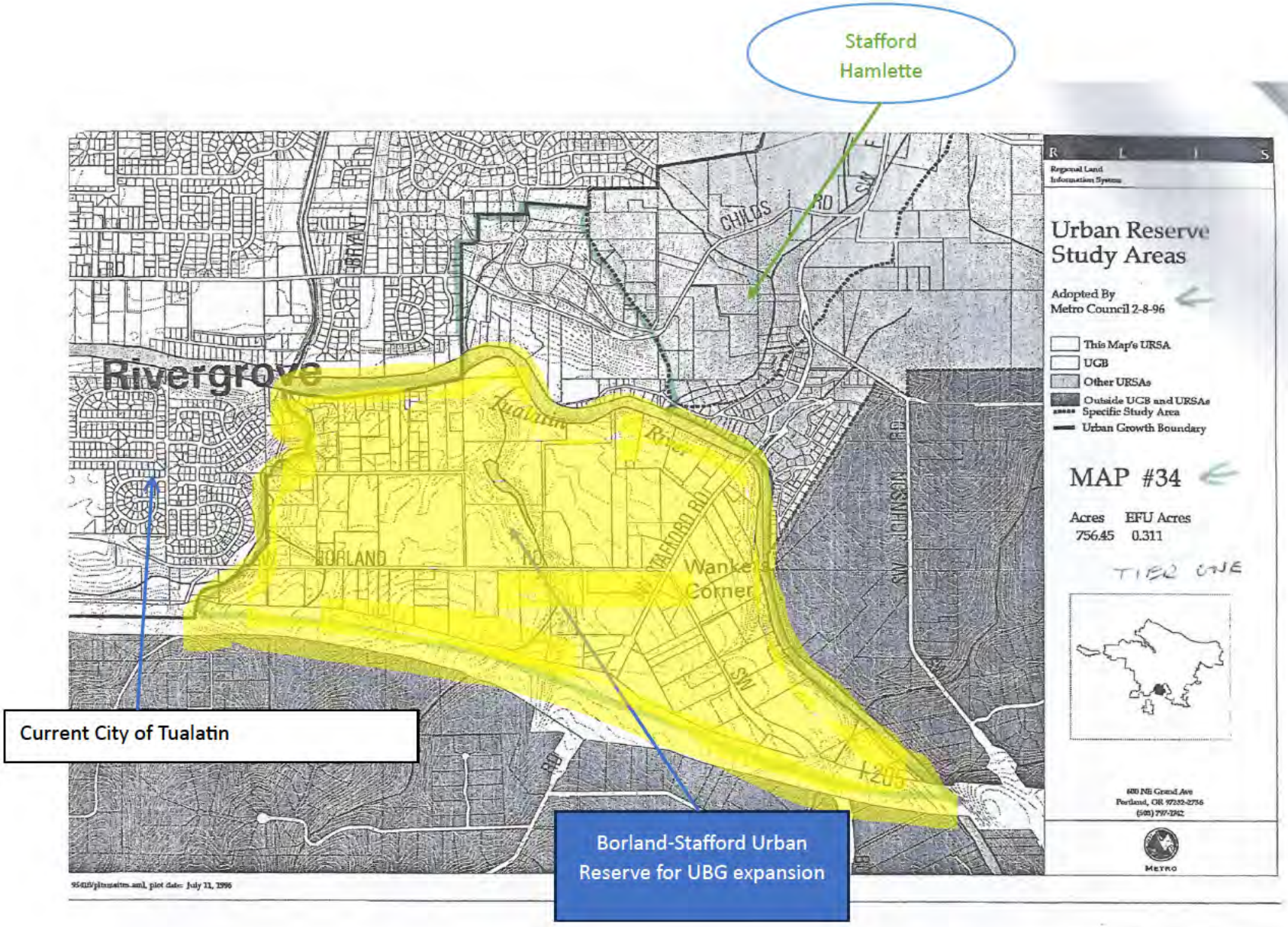
Borland can be part of the solution and help Metro meet its statutory responsibility. Based on consultation with civil engineers and developers over many years, we are confident that the developable acreage in Borland easily could accommodate approximately 1,500 units of mixed types of housing, along with an adequate supporting retail center. Its existing access to I-205 and major arterials, with improvements, make it an ideal location from which to commute to jobs along the I-205 and I-5 corridors.

To have the deepest, broadest impact on metropolitan Portland's shortage of both housing and industrial land, Metro must make bold policy decisions like bringing Borland out of Reserves and into a developable UGB.

Best regards,



Tom Holt
for Borland Property Owners Association


Stafford Hamlette
Rivergrove
Tualatin River
Wanke's Corner
BORLAND RD
STAFFORD RD
CHILDS RD
SW JOHNSON RD
I-205
Current City of Tualatin
Borland-Stafford Urban Reserve for UBG expansion
Regional Land Information System
Urban Reserve Study Areas
Adopted By Metro Council 2-8-96
This Map's URSA
UGB
Other URSAs
Outside UGB and URSAs
Specific Study Area
Urban Growth Boundary
MAP #34
Acres EFU Acres
756.45 0.311
TIER ONE
METRO

National Association of REALTORS®
Median Sales Price of Existing Single-Family Homes for Metropolitan Areas

CBSA Code	Metropolitan Area	2021	2022	2023 r	2023 I	2023 II	2023 III	2023 IV r	2024 I p	Q1-Q1 %Chya
					(Not Seasonally Adjusted, 000s)					
	U S	357 1	392 8	394 1	371 0	402 5	406 3	391 3	389 4	5 0%
	NE	394 1	426 0	444 4	394 1	452 6	467 7	441 0	437 6	11 0%
	MW	263 3	281 9	290 8	263 6	301 2	304 6	282 3	283 1	7 4%
	SO	317 5	359 5	362 0	345 9	367 6	367 9	359 4	357 3	3 3%
	WE	558 8	617 1	602 6	559 3	609 5	623 2	609 3	600 3	7 3%
40980	Saginaw, MI	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
41940	San Jose-Sunnyvale-Santa Clara, CA	1640 0	1797 8	1765 0	1618 4	1800 0	1850 0	1750 3	1840 0	13 7%
11244	Anaheim-Santa Ana-Irvine, CA	1099 0	1235 0	1260 0	1195 5	1250 0	1305 0	1299 5	1365 0	14 2%
41860	San Francisco-Oakland-Hayward, CA	1320 0	1350 0	1272 5	1140 0	1335 0	1300 0	1251 0	1300 0	14 0%
46520	Urban Honolulu, HI	996 2	1126 7	1055 9	1029 0	1060 7	1061 9	1069 4	1085 8	5 5%
41740	San Diego-Carlsbad, CA	830 0	911 0	931 2	880 0	942 4	978 5	931 6	981 0	11 5%
42020	San Luis Obispo-Paso Robles, CA	762 1	889 3	888 6	850 2	890 9	889 9	912 1	909 3	7 0%
37100	Oxnard-Thousand Oaks-Ventura, CA	980 2	896 9	903 3	844 8	904 9	921 5	916 8	908 7	7 6%
41500	Salinas, CA	886 6	899 2	933 4	863 9	915 6	945 3	993 9	899 2	4 1%
34940	Naples-Immokalee-Marco Island, FL	645 0	782 0	790 0	777 0	850 0	770 0	755 0	850 0	9 4%
31084	Los Angeles-Long Beach-Glendale, CA	801 3	849 4	833 4	746 8	789 4	897 6	884 4	823 0	10 2%
14500	Boulder, CO	782 7	857 8	857 2	836 9	871 2	857 8	849 4	822 4	-1 7%
42660	Seattle-Tacoma-Bellevue, WA	698 6	756 2	735 0	699 3	760 8	744 3	732 2	755 3	8 0%
14460	Boston-Cambridge-Newton, MA-NH	642 2	685 6	714 0	644 4	734 2	745 1	704 7	704 7	9 4%
12700	Barnstable Town, MA	617 8	683 0	715 4	672 7	711 5	731 0	737 8	701 7	4 3%
35004	Nassau County-Suffolk County, NY	635 1	670 8	683 5	653 2	673 4	702 3	696 6	695 9	6 5%
35614	New York-Jersey City-White Plains, NY-NJ	535 8	589 2	623 9	560 2	608 8	650 5	659 2	663 1	18 4%
35620	New York-Newark-Jersey City, NY-NJ-PA	561 0	607 6	636 9	577 3	629 0	665 0	659 3	659 2	14 2%
14860	Bridgeport-Stamford-Norwalk, CT	630 0	657 7	694 1	600 7	722 4	728 5	681 9	658 1	9 6%
19740	Denver-Aurora-Lakewood, CO	607 1	670 1	661 0	636 1	674 5	673 0	652 3	651 0	2 3%
42140	Santa Fe, NM	535 5	610 3	638 7	608 7	641 0	669 4	629 7	631 1	3 7%
33100	Miami-Fort Lauderdale-West Palm Beach, FL	480 0	557 5	593 0	560 0	605 0	602 5	600 0	625 0	11 6%
35084	Newark, NJ-PA	512 3	563 3	621 7	513 4	635 6	672 7	628 4	610 1	18 8%
39900	Reno, NV	531 8	596 6	585 8	535 8	585 8	608 0	599 0	605 9	13 1%
22660	Fort Collins, CO	514 3	610 0	611 2	590 4	628 9	622 1	586 1	604 5	2 4%
47900	Washington-Arlington-Alexandria, DC-VA-MD-WV	544 3	585 0	602 7	557 2	629 0	612 6	591 7	600 2	7 7%
40140	Riverside-San Bernardino-Ontario, CA	510 0	565 0	565 0	550 0	570 0	565 0	565 5	579 9	5 4%
38900	Portland-Vancouver-Hillsboro, OR-WA	536 4	591 0	584 8	556 8	599 4	593 4	579 4	574 0	3 1%
41100	St George, UT	462 7	583 2	537 6	512 2	548 0	541 9	541 6	554 8	8 3%
41620	Salt Lake City, UT	486 1	569 1	542 2	522 7	546 9	554 5	541 0	551 2	5 5%
40900	Sacramento--Roseville--Arden-Arcade, CA	500 0	540 0	527 1	500 0	530 0	542 0	535 0	533 9	6 8%
38860	Portland-South Portland, ME	418 1	473 0	505 1	462 8	538 7	528 0	495 5	512 4	10 7%
35840	North Port-Sarasota-Bradenton, FL	405 0	505 6	510 0	500 0	525 0	515 0	499 9	510 0	2 0%
31700	Manchester-Nashua, NH	412 6	466 0	485 3	441 9	489 5	505 6	486 8	508 4	15 0%
39340	Provo-Orem, UT	475 7	569 1	510 5	492 6	520 3	532 7	500 9	507 4	3 0%
24540	Greeley, CO	453 0	489 3	484 9	471 7	489 0	491 7	484 5	482 6	2 3%
36260	Ogden-Clearfield, UT	417 8	483 0	475 1	451 9	485 6	481 7	478 6	482 1	6 7%
14260	Boise City-Nampa, ID	468 6	491 6	474 0	440 7	480 8	485 9	478 1	471 5	7 0%
39300	Providence-Warwick, RI-MA	396 1	440 9	460 9	417 0	462 3	480 1	467 5	470 7	12 9%
38060	Phoenix-Mesa-Scottsdale, AZ	415 4	477 9	459 6	439 7	464 2	467 2	466 5	470 5	7 0%
12420	Austin-Round Rock, TX	488 6	555 4	481 2	467 9	496 3	485 7	466 4	466 7	-0 3%
29820	Las Vegas-Henderson-Paradise, NV	397 0	466 4	450 4	431 4	449 6	460 6	459 6	465 4	7 9%
21660	Eugene, OR	417 1	463 9	465 4	451 0	475 4	476 9	450 4	462 7	2 6%
20524	Dutchess County-Putnam County, NY	397 0	431 8	440 3	397 0	434 7	460 1	457 0	454 1	14 4%
48900	Wilmington, NC	355 3	410 1	441 5	416 5	439 4	456 5	447 5	453 7	8 9%
15540	Burlington-South Burlington, VT	389 2	442 2	471 1	429 5	486 5	478 1	468 9	448 9	4 5%
17820	Colorado Springs, CO	432 9	463 4	460 4	444 7	467 1	466 3	459 3	448 8	0 9%
41420	Salem, OR	411 1	451 7	452 7	453 7	451 0	456 2	449 7	446 0	-1 7%
31540	Madison, WI	361 5	392 7	417 9	397 9	429 2	428 3	403 7	445 3	11 9%
11700	Asheville, NC	378 6	426 9	456 6	435 2	456 0	463 5	466 6	444 7	2 2%
11460	Ann Arbor, MI	348 8	373 8	435 3	398 0	485 0	448 0	410 0	440 9	10 8%
20500	Durham-Chapel Hill, NC	397 9	453 6	468 3	412 6	495 5	483 2	460 0	440 9	6 9%
39580	Raleigh, NC	392 8	455 3	459 9	420 0	471 6	478 6	461 2	439 8	4 7%
30860	Logan, UT-ID	364 2	441 6	431 7	441 9	440 6	421 0	424 3	436 1	-1 3%
42680	Sebastian-Vero Beach, FL	325 0	375 0	387 5	384 0	412 0	373 4	385 0	435 8	13 5%
36740	Orlando-Kissimmee-Sanford, FL	356 9	420 0	434 0	419 9	435 0	436 5	442 0	435 0	3 6%
49340	Worcester, MA-CT	371 7	409 1	436 6	387 6	452 0	456 5	434 3	430 9	11 2%
28420	Kennewick-Richland, WA	380 9	440 3	428 4	425 4	428 9	433 6	422 8	426 9	0 4%
38940	Port St Lucie, FL	332 0	400 0	409 9	391 5	410 0	413 6	420 0	425 0	8 6%
40060	Richmond, VA	342 8	374 0	393 0	362 3	395 0	401 7	412 8	425 0	17 3%
16700	Charleston-North Charleston, SC	375 2	416 1	423 2	406 0	430 2	421 5	429 0	421 4	3 8%

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	Metropolitan Area	2021	2022	2023 r	2023 I	2023 II	2023 III	2023 IV r	2024 I p	Q1-Q1
					(Not Seasonally Adjusted, 000s)					%Chya
15980	Cape Coral-Fort Myers, FL	360 0	430 0	420 0	434 0	439 0	405 0	400 0	415 0	-4 4%
11260	Anchorage, AK	380 6	408 4	423 9	395 6	441 0	437 2	400 8	412 0	4 1%
28740	Kingston, NY	346 6	379 7	401 1	358 9	394 5	427 1	421 8	411 1	14 5%
23420	Fresno, CA	370 0	410 0	410 0	390 0	420 0	420 0	405 0	410 0	5 1%
23580	Gainesville, GA	345 0	393 9	401 5	383 5	420 4	401 5	398 7	405 8	5 8%
44060	Spokane-Spokane Valley, WA	382 1	423 9	412 7	383 4	424 4	433 2	397 6	405 4	5 7%
45300	Tampa-St Petersburg-Clearwater, FL	330 0	400 0	405 0	390 0	409 9	415 0	410 0	405 2	3 9%
34980	Nashville-Davidson--Murfreesboro--Franklin, TN	349 5	403 7	401 5	385 8	401 3	413 6	405 3	404 3	4 8%
18880	Crestview-Fort Walton Beach-Destin, FL	384 1	420 0	410 0	400 0	432 0	407 0	394 6	399 0	-0 2%
16740	Charlotte-Concord-Gastonia, NC-SC	354 1	397 7	398 0	387 2	403 1	406 9	395 1	398 3	2 9%
17020	Chico, CA	419 8	439 6	409 2	387 4	412 9	424 7	407 0	397 0	2 5%
27260	Jacksonville, FL	325 0	386 5	389 4	370 0	390 9	390 0	392 7	390 0	5 4%
46060	Tucson, AZ	331 2	371 9	377 1	362 6	383 3	381 6	378 8	389 7	7 5%
12580	Baltimore-Columbia-Towson, MD	358 1	378 2	388 6	357 8	399 8	406 3	383 9	385 0	7 6%
45940	Trenton, NJ	353 7	367 8	398 8	338 8	409 4	434 2	419 7	380 4	12 3%
39460	Punta Gorda, FL	315 0	388 9	375 0	378 0	380 0	374 4	371 0	379 8	0 5%
19100	Dallas-Fort Worth-Arlington, TX	336 7	385 5	381 9	372 4	389 8	385 7	376 2	377 7	1 4%
33460	Minneapolis-St Paul-Bloomington, MN-WI	354 8	375 4	379 9	361 5	386 7	387 9	374 0	373 5	3 3%
12020	Athens-Clarke County, GA	293 1	349 4	369 8	349 9	385 4	366 9	371 7	372 9	6 6%
12540	Bakersfield, CA	323 2	364 6	370 4	358 9	371 9	383 3	367 3	370 3	3 2%
37340	Palm Bay-Melbourne-Titusville, FL	305 0	356 4	359 0	350 0	360 0	365 0	360 0	370 0	5 7%
12060	Atlanta-Sandy Springs-Marietta, GA	317 2	365 1	370 0	354 3	376 5	379 2	366 9	369 2	4 2%
34820	Myrtle Beach-Conway-North Myrtle Beach, SC-NC	294 0	364 3	366 5	368 4	368 3	366 7	362 5	366 1	-0 6%
35300	New Haven-Milford, CT	300 0	339 0	356 9	314 8	365 8	373 1	363 7	364 9	15 9%
19660	Deltona-Daytona Beach-Ormond Beach, FL	290 0	349 9	355 0	345 0	355 0	357 0	362 4	360 0	4 3%
23540	Gainesville, FL	299 6	340 0	354 0	335 5	366 0	360 0	344 0	354 4	5 6%
33340	Milwaukee-Waukesha-West Allis, WI	319 0	345 3	372 4	339 6	387 4	386 1	359 0	354 0	4 2%
16940	Cheyenne, WY	320 6	354 7	360 9	341 2	363 2	376 1	359 4	351 7	3 1%
28940	Knoxville, TN	279 0	325 1	341 3	323 0	342 4	350 6	346 9	351 2	8 7%
37460	Panama City, FL	298 5	353 6	365 0	365 0	370 0	366 6	361 9	351 0	-3 8%
25540	Hartford-West Hartford-East Hartford, CT	297 8	325 8	355 9	314 9	357 8	375 1	358 2	350 4	11 3%
16980	Chicago-Naperville-Elgin, IL-IN-WI	330 4	345 6	351 2	321 0	362 6	365 1	343 3	349 3	8 8%
22220	Fayetteville-Springdale-Rogers, AR-MO	271 2	329 2	346 9	328 8	356 0	349 3	347 5	342 7	4 2%
37980	Philadelphia-Camden-Wilmington, PA-NJ-DE-MD	305 0	333 1	349 8	315 3	352 9	368 5	353 5	342 5	8 6%
10740	Albuquerque, NM	292 5	336 6	353 3	335 2	361 4	363 2	348 7	341 8	2 0%
49420	Yakima, WA	327 1	352 1	350 6	335 7	356 7	354 3	349 6	341 5	1 7%
35980	Norwich-New London, CT	296 0	326 4	345 9	310 1	345 9	361 4	353 9	337 0	8 7%
47260	Virginia Beach-Norfolk-Newport News, VA-NC	285 0	323 9	334 4	313 2	339 7	344 5	335 0	336 5	7 4%
26420	Houston-The Woodlands-Sugar Land, TX	304 1	345 0	340 3	327 0	348 3	345 6	336 6	334 1	2 2%
44140	Springfield, MA	287 5	318 1	336 2	296 0	336 0	355 1	337 8	333 7	12 7%
29460	Lakeland-Winter Haven, FL	270 0	335 0	334 4	329 0	335 9	335 0	335 6	333 3	1 3%
40340	Rochester, MN	291 2	319 0	319 8	303 8	332 7	315 6	316 5	331 3	9 1%
12100	Atlantic City-Hammonton, NJ	293 3	319 2	318 5	288 7	317 5	336 9	328 8	330 9	14 6%
17860	Columbia, MO	255 0	288 9	304 1	290 6	310 1	316 4	294 8	329 0	13 2%
24860	Greenville-Anderson-Mauldin, SC	279 1	322 3	335 5	310 0	333 9	340 4	351 8	326 9	5 5%
24340	Grand Rapids-Wyoming, MI	267 7	297 7	317 8	290 5	330 3	329 4	309 2	325 4	12 0%
20100	Dover, DE	283 8	304 1	318 0	294 7	323 3	333 4	313 6	323 6	9 8%
10900	Allentown-Bethlehem-Easton, PA-NJ	266 4	297 2	326 6	298 0	330 7	338 2	325 1	321 8	8 0%
43620	Sioux Falls, SD	269 5	314 3	325 9	286 1	341 4	333 6	322 5	321 3	12 3%
15500	Burlington, NC	250 5	307 8	317 2	304 6	313 2	327 9	320 2	320 9	5 4%
37860	Pensacola-Ferry Pass-Brent, FL	281 0	325 0	324 0	319 9	330 0	325 0	317 3	320 0	0 0%
29540	Lancaster, PA	260 6	292 1	313 7	279 7	318 8	327 8	320 5	318 3	13 8%
39380	Pueblo, CO	286 7	305 3	308 5	312 4	307 0	309 5	304 7	314 8	0 8%
26620	Huntsville, AL	280 4	324 9	324 2	313 6	324 3	325 2	333 5	313 9	0 1%
28140	Kansas City, MO-KS	279 2	309 5	320 1	291 0	333 9	328 8	315 8	308 6	6 0%
18140	Columbus, OH	274 1	301 1	312 7	284 7	327 5	323 4	307 1	306 6	7 7%
41700	San Antonio-New Braunfels, TX	291 2	337 7	326 8	320 5	334 1	332 1	315 7	305 8	-4 6%
45220	Tallahassee, FL	273 7	310 0	323 3	305 0	332 0	326 2	322 0	305 0	0 0%
27740	Johnson City, TN	231 5	263 6	288 4	253 9	294 3	301 5	292 5	302 9	19 3%
16860	Chattanooga, TN-GA	255 3	290 0	296 2	281 8	297 4	313 1	293 2	302 3	7 3%
26980	Iowa City, IA	258 1	277 8	292 5	271 6	297 7	301 5	286 7	302 1	11 2%
26900	Indianapolis-Carmel-Anderson, IN	260 5	294 6	305 2	289 3	311 2	316 4	300 1	300 1	3 7%
38340	Pittsfield, MA	302 4	326 0	331 9	287 4	287 4	353 1	349 9	300 0	4 4%
17420	Cleveland, TN	248 7	290 3	301 0	285 3	301 9	322 2	290 3	297 3	4 2%
49180	Winston-Salem, NC	235 6	280 5	289 9	277 0	292 2	299 4	287 8	295 8	6 8%
13820	Birmingham-Hoover, AL	271 2	303 9	301 1	276 5	315 8	310 2	301 9	295 0	6 7%
35100	New Bern, NC	221 9	252 3	281 0	250 5	301 4	282 1	283 8	293 7	17 2%
43900	Spartanburg, SC	235 4	272 3	289 8	278 7	291 1	295 1	294 6	292 7	5 0%
13900	Bismarck, ND	273 7	271 0	277 0	258 5	277 4	293 0	269 6	290 0	12 2%
25180	Hagerstown-Martinsburg, MD-WV	245 4	271 9	286 0	264 4	293 2	289 3	290 7	288 4	9 1%

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	Metropolitan Area	2021	2022	2023 r	2023 I	2023 II	2023 III	2023 IV r	2024 I p	Q1-Q1
					(Not Seasonally Adjusted, 000s)					%Chya
19780	Des Moines-West Des Moines, IA	258 2	274 9	288 0	265 3	296 6	297 6	282 6	288 0	8 6%
24580	Green Bay, WI	234 5	259 4	289 8	257 6	296 4	305 2	282 6	288 0	11 8%
36540	Omaha-Council Bluffs, NE-IA	242 0	272 6	290 0	274 1	297 5	297 8	282 3	286 1	4 4%
36100	Ocala, FL	230 0	280 0	285 0	279 9	287 1	286 0	289 0	285 3	1 9%
11540	Appleton, WI	241 0	263 9	284 6	274 9	284 7	293 3	279 5	284 9	3 6%
43300	Sherman-Denison, TX	254 2	277 1	282 9	256 1	296 2	288 5	285 2	284 6	11 1%
24660	Greensboro-High Point, NC	228 6	270 3	282 4	266 2	287 0	287 7	286 3	283 8	6 6%
30700	Lincoln, NE	245 1	273 1	288 6	275 0	292 7	295 9	286 2	283 0	2 9%
25860	Hickory-Lenoir-Morganton, NC	231 2	257 3	285 4	271 6	284 0	299 2	284 5	282 9	4 2%
22020	Fargo, ND-MN	255 9	283 8	288 9	267 9	300 8	290 2	284 5	282 5	5 4%
10580	Albany-Schenectady-Troy, NY	257 6	279 6	296 6	259 8	296 3	313 2	307 4	281 4	8 3%
17140	Cincinnati, OH-KY-IN	243 4	263 0	282 0	252 2	294 2	293 3	278 2	280 6	11 3%
35380	New Orleans-Metairie, LA	268 1	285 6	275 9	265 2	287 1	281 5	263 3	277 7	4 7%
40220	Roanoke, VA	244 5	267 7	278 2	266 7	284 2	283 1	277 7	276 0	3 5%
22140	Farmington, NM	215 7	248 0	259 7	240 7	251 5	273 8	265 9	274 9	14 2%
39540	Racine, WI	228 2	250 2	262 0	230 4	258 3	272 9	274 9	274 1	19 0%
32820	Memphis, TN-MS-AR	248 7	271 6	274 5	268 6	287 9	280 0	255 8	272 4	1 4%
17900	Columbia, SC	233 2	269 9	273 3	262 8	277 6	276 9	273 0	268 4	2 1%
14540	Bowling Green, KY	236 4	256 5	272 6	249 2	275 8	274 9	283 9	267 2	7 2%
30460	Lexington-Fayette, KY	224 2	242 5	257 8	242 2	261 3	265 1	258 8	267 0	10 2%
18580	Corpus Christi, TX	250 0	273 4	273 7	263 7	274 9	279 5	276 3	266 6	1 1%
19460	Decatur, AL	204 2	234 1	247 0	240 5	245 8	263 1	238 4	262 6	9 2%
31140	Louisville/Jefferson County, KY-IN	235 6	254 2	263 8	246 0	270 9	271 9	262 3	262 0	6 5%
13980	Blacksburg-Christiansburg, VA	250 2	272 2	284 9	255 7	308 4	295 2	271 2	261 6	2 3%
12940	Baton Rouge, LA	249 4	269 2	264 7	262 9	268 6	263 7	262 9	260 0	-1 1%
10180	Abilene, TX	215 4	239 0	240 1	238 2	235 1	253 3	234 6	258 4	8 5%
39740	Reading, PA	216 2	234 0	259 8	231 8	267 5	271 2	261 0	258 0	11 3%
21340	El Paso, TX	200 8	237 1	240 6	224 2	221 8	254 6	261 8	257 7	14 9%
47580	Warner Robins, GA	214 8	239 3	258 4	253 0	254 5	267 6	255 5	257 1	1 6%
27340	Jacksonville, NC	203 8	237 6	258 8	243 5	265 2	265 2	257 8	253 3	4 0%
49620	York-Hanover, PA	221 0	240 8	258 7	242 5	265 8	264 9	256 4	253 1	4 4%
25420	Harrisburg-Carlisle, PA	219 3	239 1	252 6	230 6	250 7	268 2	254 5	252 4	9 5%
36420	Oklahoma City, OK	194 2	223 4	243 8	227 3	247 6	251 2	243 3	251 0	10 4%
28700	Kingsport-Bristol-Bristol, TN-VA	191 4	223 3	255 6	237 8	257 6	261 8	260 3	250 5	5 3%
46140	Tulsa, OK	221 6	242 3	254 3	238 8	262 0	258 7	255 5	250 0	4 7%
23844	Gary-Hammond, IN	223 3	247 1	253 8	236 9	260 9	259 1	254 8	249 3	5 2%
41180	St Louis, MO-IL	226 1	245 3	254 4	231 1	266 2	268 6	243 7	241 1	4 3%
22180	Fayetteville, NC	189 8	217 9	234 0	220 3	239 8	240 1	233 2	240 2	9 0%
19820	Detroit-Warren-Deaborn, MI	245 7	250 9	251 1	227 0	265 3	266 6	241 5	240 0	5 7%
19380	Dayton, OH	193 1	212 3	238 1	206 3	234 8	251 8	240 7	237 5	15 1%
44180	Springfield, MO	198 6	231 9	240 6	225 3	247 0	246 6	238 7	236 9	5 1%
24020	Glens Falls, NY	231 1	245 9	252 6	229 5	225 5	274 3	278 4	236 2	2 9%
30980	Longview, TX	210 5	239 7	240 8	232 5	243 8	245 2	240 6	234 8	1 0%
20260	Duluth, MN-WI	218 9	233 2	254 3	217 7	276 3	263 1	243 4	234 5	7 7%
14010	Bloomington, IL	184 3	208 8	231 5	196 9	239 0	243 4	230 4	233 3	18 5%
23060	Fort Wayne, IN	189 9	214 1	228 3	205 4	236 6	239 3	222 2	232 7	13 3%
22540	Fond du Lac, WI	177 0	190 9	233 9	187 7	243 4	238 6	224 4	232 2	23 7%
31180	Lubbock, TX	206 9	229 8	229 1	222 4	231 7	230 2	230 1	230 4	3 6%
15380	Buffalo-Cheektowaga-Niagara Falls, NY	209 9	230 0	240 5	206 8	236 8	260 6	243 5	229 7	11 1%
36780	Oshkosh-Neenah, WI	192 8	220 2	249 1	218 9	251 4	261 5	248 0	227 2	3 8%
11100	Amarillo, TX	202 1	218 4	222 9	210 2	223 6	230 7	225 7	222 9	6 0%
22500	Florence, SC	183 2	206 8	215 2	204 0	208 2	230 5	217 3	222 0	8 8%
13140	Beaumont-Port Arthur, TX	199 7	214 7	210 9	209 7	214 8	212 3	199 4	220 7	5 2%
48620	Wichita, KS	191 2	209 4	216 2	203 9	220 7	224 3	210 6	219 9	7 8%
27140	Jackson, MS	220 2	241 6	224 8	218 9	240 8	234 2	195 5	219 1	0 1%
33660	Mobile, AL	195 9	211 4	221 2	215 3	228 7	233 8	206 9	218 3	1 4%
43340	Shreveport-Bossier City, LA	196 4	213 6	216 0	215 6	224 8	210 5	211 2	213 6	-0 9%
40380	Rochester, NY	192 1	211 0	231 9	190 4	240 6	247 0	230 5	212 4	11 6%
25060	Gulfport-Biloxi-Pascagoulia, MS	192 1	213 8	220 8	205 3	229 2	222 4	219 1	210 8	2 7%
36980	Owensboro, KY	174 4	189 5	196 5	189 9	194 3	212 7	194 3	210 2	10 7%
29620	Lansing-East Lansing, MI	189 8	203 7	212 8	179 4	226 1	227 2	210 3	208 0	15 9%
38300	Pittsburgh, PA	205 5	213 5	216 3	191 0	225 9	231 1	210 2	207 1	8 4%
31420	Macon-Bibb, GA	180 0	213 1	215 4	201 8	219 9	219 2	215 1	206 8	2 5%
16020	Cape Girardeau, MO-IL	186 4	202 0	216 1	196 5	222 1	221 1	219 8	205 1	4 4%
16300	Cedar Rapids, IA	182 8	196 4	205 3	186 3	207 2	218 9	206 0	203 3	9 1%
30780	Little Rock-North Little Rock-Conway, AR	184 6	205 6	208 9	203 0	212 6	216 7	200 0	202 8	-0 1%
27900	Joplin, MO	158 7	177 7	183 9	173 4	188 3	193 6	181 3	201 7	16 3%
45060	Syracuse, NY	177 5	195 1	214 7	176 3	211 6	232 1	222 7	198 8	12 8%
33860	Montgomery, AL	189 5	198 7	201 4	185 4	214 2	210 2	193 4	198 1	6 9%
28100	Kankakee, IL	176 9	188 7	192 2	158 3	196 8	212 4	198 4	193 1	22 0%

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					(Not Seasonally Adjusted, 000s)					%Chya
17460	Cleveland-Elyria, OH	198 8	215 7	214 3	191 4	228 7	236 7	190 7	191 9	0 3%
48660	Wichita Falls, TX	158 6	178 6	187 6	183 6	193 3	176 6	196 9	188 9	2 9%
16580	Champaign-Urbana, IL	178 3	191 1	200 9	157 2	211 9	222 9	195 1	188 6	20 0%
10420	Akron, OH	179 8	196 7	196 4	172 7	206 0	220 3	181 5	185 7	7 5%
45820	Topeka, KS	169 2	179 0	190 3	172 1	194 6	199 6	192 3	183 9	6 9%
15940	Canton-Massillon, OH	168 8	175 0	187 9	178 1	188 8	199 8	180 1	183 3	2 9%
43780	South Bend-Mishawaka, IN-MI	173 0	194 9	196 6	183 0	200 7	209 4	189 5	180 0	-1 6%
40420	Rockford, IL	156 2	162 5	172 6	149 7	176 3	181 7	175 7	179 8	20 1%
11500	Anniston-Oxford, AL	154 7	164 8	178 8	160 3	180 0	184 2	188 9	179 1	11 7%
47940	Waterloo-Cedar Falls, IA	152 4	166 7	169 0	159 1	171 5	174 2	171 9	177 0	11 3%
16620	Charleston, WV	161 3	167 4	174 7	156 6	173 5	190 5	177 3	175 8	12 3%
19340	Davenport-Moline-Rock Island, IA-IL	152 3	160 4	170 3	146 8	179 8	178 8	168 1	168 6	14 9%
45780	Toledo, OH	158 5	167 2	174 1	156 0	177 2	184 2	175 0	165 5	6 1%
21500	Erie, PA	146 6	158 3	169 2	155 3	169 0	174 2	174 2	164 1	5 7%
44100	Springfield, IL	146 7	157 0	163 2	147 9	162 6	170 1	166 2	163 0	10 2%
13780	Binghamton, NY	145 5	152 4	162 2	141 8	160 0	173 7	167 1	158 9	12 1%
49660	Youngstown-Warren-Boardman, OH-PA	133 3	139 9	147 6	133 6	157 3	151 3	146 3	142 5	6 7%
19060	Cumberland, MD-WV	132 9	134 8	142 7	120 0	145 4	152 4	149 5	141 8	18 2%
21300	Elmira, NY	142 0	149 1	150 9	160 0	144 5	156 6	142 7	135 8	-15 1%
37900	Peoria, IL	130 5	138 2	148 4	128 6	156 6	157 5	144 2	127 2	-1 1%
19500	Decatur, IL	112 6	120 0	126 0	110 3	133 4	128 2	125 1	122 8	11 3%
78010	St Croix, Virgin Islands	319 4	347 0	342 5	289 0	340 0	300 0	379 5	335 0	15 9%

*All areas are metropolitan statistical areas (MSA) as defined by the US Office of Management and Budget though in some areas an exact match is not possible from the available data

MSAs include the named central city and surrounding areas and may not match local reporting due to differences in specification N/A Not Available p Preliminary r Revised

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Miriam Hanes

From: Eryn Kehe
Sent: Monday, August 12, 2024 11:50 AM
To: Miriam Hanes
Subject: FW: Borland Property Owners letter on UGR
Attachments: Stafford-Borland Map.pdf; metro-home-prices-q1-2024-ranked-median-single-family-2024-05-08.pdf; Councilor Lewis Urban Growth Report letter - Borland Property Owners.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

The three of these document together constitute a public comment to the draft UGR. Can you save as one PDF with the letter first and include in the record?

Eryn

Eryn Deeming Kehe, AICP | Metro | Urban Policy and Development Manager
My gender pronouns: she her, hers | [redacted]

From: Ramona Perrault <[redacted]
Sent: Monday, August 12, 2024 11:43 AM
To: Andy Shaw <[redacted]>; Eryn Kehe [redacted]>; Ted Reid [redacted]
Subject: FW: Borland Property Owners letter on UGR

Just keeping folks in the loop.

Ramona Perrault
Policy Advisor
Metro
600 NE Grand Avenue
Portland, OR 97232-2736
[redacted]

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From: Tom Holt <[redacted]>
Sent: Monday, August 12, 2024 10:16 AM
To: Christine Lewis [redacted]
Cc: Ramona Perrault [redacted]
Subject: [External sender]RE: Borland Property Owners letter on UGR

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Apologies for the additional email. I left out a pair of attachments. Complete package attached.

Tom Holt
[redacted]
Book a meeting: [redacted]

From: Tom Holt
Sent: Monday, August 12, 2024 9:51 AM
To: [redacted]
Cc: [redacted]
Subject: Borland Property Owners letter on UGR

Councilor Lewis –

Please see the attached letter on behalf of the Borland Property Owners Association.

Best regards,
Tom Holt
The Holt Company
Government & Public Affairs
[redacted]
To schedule meeting with me: [redacted]

Port of Portland

August 19, 2024

SENT VIA EMAIL AND US MAIL

Marissa Madrigal, Chief Operating Officer
Oregon Metro
600 NE Grand Ave.
Portland, OR 97232

RE: Comments on 2024 Draft Metro Urban Growth Report

Dear Ms. Madrigal:

Thank you for the opportunity to comment on the 2024 Draft Metro Urban Growth Report (Draft UGR) on behalf of the Port of Portland (Port).

The Port is a major industrial landowner in the region and active participant in economic development efforts statewide, such as the Governor's Semiconductor Competitiveness Task Force and Clean Tech Manufacturing Task Force. We are also active members of several Metro-convened policy committees, including the stakeholder roundtable convened to inform the 2024 growth management decision. Based on these perspectives, we have closely reviewed the Draft UGR, and submit the attached technical comments.

At a high level, we recognize the bounds of this exercise and appreciate the work Metro has done to provide insight into the process and invite a variety of perspectives. At the same time, we are concerned that industrial land demand is understated, and the effective supply is overstated. Readiness and viability for development rely on several factors beyond acerage alone, and we fear that identifying a surplus of supply without this realistic overlay could have negative policy implications by limiting much needed public and private investment in site readiness within the Urban Growth Boundary (UGB).

Creating opportunities to grow traded sector employment is essential to Oregon, which is dependent on income tax, as well as providing living wage jobs for residents. In addition, this finding impacts other important policy documents, such as the Regional Transportation Plan.

Given the importance of this topic to the region and the state, we look forward to working with Metro and other partners on processes to ensure an adequate supply of industrial land moving forward. Such partnerships could include revisiting Metro's 2040 Growth Concept to identify long term strategies to provide for an adequate industrial land supply, particularly for key traded sector industries. It would also be helpful for regional partners to update both the Site Readiness Toolkit and the Brownfields Inventory. Having this objective and current information, with mutually aligned methodology, will help us better craft and execute strategies aimed at our common economic development, land use and transportation goals.

Thank you again for the opportunity to engage and comment. Please let us know if you have questions or if you are interested in discussing any of these points in more detail.

Sincerely,

Teresa Carr,
Director, Business Development & Properties

Port of Portland

Port of Portland Technical Comments on Draft UGR

- Potential Underestimate of Land Demand: The cumulative impact of the assumption in Appendix 3 appears to be leading to an underestimate of land demand for specific use categories such as warehouse/distribution.
    - Appendix 3-assumptions about industrial building square footage appear to be too low. Several Port warehouse/distribution tenants have over 5000/sf per employee, underscoring a long-term trend toward automation and mechanization in the logistics industry.
    - Appendix 3-assumptions for industrial floor area ratio (FAR) of .25-.5 is likely too high, based on users that require extensive exterior storage and/or laydown areas, for example auto importers/exporters, ship repair and wind energy fabrication.
    - Appendix 3 Table 2 indicates that the distribution of building types for the Transportation, Warehouse & Utilities sector (NAICS 22,48- 49) is "31% Office, 6% Institution, 10% Flex/BP, 1% Gen Industrial, 43% Warehouse, 9% retail". Based on our experience, the assumed amount of warehouse building type for this sector should be much higher and certainly the majority of building space.

- Inventory Criteria: At the 7/17/24 MTAC meeting, Metro staff was asked about including industrial land with a 7% or greater slope in the inventory. A representative from Washington County noted that land with a 5% slope is typically used for industrial land inventories. When asked how much land would come out of the inventory if a 5% slope was used as the metric, Metro staff indicated "about 1,300 acres". This single correction would result in a 22% reduction of the purported 5,900 acres of industrial inventory identified in the Draft UGR.
    - Appendix 6 notes that the median size for industrial parcels in the assumed inventory is .6 acres, comprising a total of 1,934 acres. Parcels this small are not suitable for an industrial use even if they are zoned industrially. "Suitable" under OAR 660 means serviceable land designated for industri or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use. The implication is that likely hundreds of acres currently counted as part of the existing industrial land inventory in the Draft UGR may not be suitable for industrial purposes.

- Sherwood Expansion Proposal: The single expansion proposal under consideration for the 2024 growth management decision is from the City of Sherwood. The Port provided a letter in support of the proposal in March, 2024 and we continue our support. In particular, we support adding industrial land that could accommodate semiconductor and other traded sector industries. To ensure those lands are available for industrial use, Metro may want to consider amending the Title 4 map to apply a Regionally Significant Industrial Area (RSIA) designation. Further, while the Port is not opposed to the inclusion of "Hospitality" land per se, we feel this category (and the need for such land) should be better defined to avoid setting an unintended precedent.

- Future Urban Growth Decisions: Incorporate an Economic Opportunities Analysis (EOA)-based analysis of sector and business-district growth opportunities across distinct parts of the region. Also, de-link the demographic and employment forecasts by acknowledging the potential for additional in-migration based on traded sector job-growth opportunities. Providing additional incentives for communities on the edge of the UGB to undertake concept planning and provide infrastructure for future expansion areas, particularly for needed industrial land, is also recommended.

Miriam Hanes

From: Greene, Erika <[redacted]>
Sent: Tuesday, August 20, 2024 1:42 PM
To: Metro 2040
Subject: [External sender]Metro UGR_Port Comments
Attachments: UGR Port Comments.pdf

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The attached is being sent on behalf of:

Teresa Carr
Director, Business Development & Properties
Port of Portland

Thank you,

Erika Greene
Real Estate Assistant I Port of Portland
Business Development & Properties
she/her
e: [redacted]
p: [redacted]

Port of Portland

Miriam Hanes

From: Todd and Shannon Christiansen <[redacted]>
Sent: Wednesday, August 7, 2024 9:52 PM
To: Metro 2040
Subject: [External sender]Comments on City of Sherwood's UGB Expansion Proposal

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Dear MPAC, Metro Council and Metro,

We are writing with respect to the proposed Sherwood West Concept Plan ("Plan") that the City of Sherwood has submitted to Metro requesting an expansion of the Urban Growth Boundary by 1,291 acres. We have been homeowners in Sherwood since 2000, nearly 24 years and have a vested interest in seeing it grow in a positive way. This proposal is lacking in facts – both actual and demonstrated needs as well as supporting details for the costs of infrastructure and reality of job opportunities and should not be approved. During the past two years, we , and many others, have been vocal in our opposition to the Plan. We were quite surprised during the presentation to Metro on May 22, Tim Rosener (Sherwood Mayor) represented to the Council that there had been little to no organized public negative sentiment towards the expansion proposal. This is simply not true and is just one of many examples of anecdotal comments in the May 22 presentation to MPAC that were not supported by actual data and facts.

Our ask of the Council and Metro, as it considers the request in alignment with outlined legislation, purpose and protocol for UGB expansion requests, is to please Follow the Facts. The Sherwood West Concept Plan may appear to be an impressive package, however it represents the viewpoints and desires of politicians and land developers and not a demonstrated need for more developable land in Sherwood or the metro area as a whole.

- Survey 75%/85% respondents-Sherwood Residents- said NO to the expansion request.
- The data shows a need for housing for the city of Sherwood of only 600, while city of Sherwood's request ranges from 3,100 to 5,500.
- Population growth projections and data do not demonstrate need for the expansion. People are moving out of Portland Metro area to Washington state and other locations since 2020. While in 2018 it looked like the trend was to continue growth of 1.6%/year, it is clear that is steadily declining and is now 33% less than it was (2018 = 1.56%, 2024 = 1.04%). https://macrotrends.net/global-metrics/cities/23102/portland/population
- Infrastructure and Traffic impact from the Plan will likely be significant and expensive. The Plan greatly downplays and minimizes this critical issue. As an example, during the May 22 presentation it was represented that road improvements would improve Roy Rogers connection to I-5, when in fact a map will show they do not intersect. This is just one example of the glossing over, and misdirection of the Plan when very real issues are raised. Furthermore, system development charges for the proposed expanded area will be significant and make the housing itself expensive.
- There is no demonstrated NEED for a 1,291-acre expansion which is excessive especially in relation to the overall size of Sherwood today. Sherwood officials have justified and represented to its residents and concerned citizens that it is in the city of Sherwood's best interest to a) have a plan of record otherwise Metro will make a plan for Sherwood (is this true?), and b) to make a single request for as much land as possible.

- There will be significant impact to farm and forestland and a good portion of the requested expansion area is in protected areas and/or will cause runoff that impacts wildlife (can be seen on a map) and the additional pollution of so many cars and congestion on the road to get to jobs will further harm the environment.
- The planned housing will not be more affordable nor improve the homeless situation. Look at the actual cost of housing at nearby Cooper Mountain for a benchmark. A more viable solution could be turning existing vacant office real estate (which there is an abundance of) into low-income efficiency apartments.
- Similarly there is already a surplus of commercial, industrial and mixed employment real estate in the greater metro area due to hybrid work trends and due to AI and automation trends as evidenced by the announced local layoffs (Nike, Intel, etc)

We appreciate that Metro has a challenging and important role in that it must balance ensuring enough land for 20 years AND also protecting the metro area from urban sprawl. The proposal by Sherwood is not a demonstrated need, but a want of politicians and developers to increase the city of Sherwood from 3,130 acres to 4,421 acres (increase of >40% for a population of 20,000!) creating unnecessary urban sprawl, excessive and unplanned for traffic, and harm to farm and wildlife and it will not contribute to affordable housing because it will be incredibly expensive to add infrastructure and build. Metro's own 2045 Distributed Forecast shows Sherwood growing by less than 1000 people and with a need for only 800 households and Sherwood still has significant unused land opportunities that could satisfy its current housing needs (e.g. Brookman annexation, and existing available properties and land infill which could be used for multi-family and middle-housing to be centered around the Old Town hub of Sherwood and make more sense for growth).

Based on records we can find, the UGB just in the vicinity of Sherwood has already expanded by 2,270 acres since 2018 (Cooper Mountain, Beef Bend South and King City). This newer UGB land is still far from fully developed/populated and should be focused on first. Additionally, the requested 1291 acres would be the largest expansion in decades (and the second largest since Cooper Mountain was added to Beaverton – which incidentally is a city 5 times larger than Sherwood so it was less than a 10% expansion of land).

We ask ourselves and Metro whether this proposed Plan and UGB expansion is truly needed for either Sherwood or the Metro area as a whole and whether the ramifications to the environment and costs of development have been truly evaluated? Based on the facts it does not appear so, and we ask you to vote against and decide NOT to expand the Portland area UGB.

Respectfully,

Shannon and Todd Christiansen



Image Credit: https://faunalytics.org/how-human-carnivory-harms-global-biodiversity/frog-on-lily-pad/

Leapfrog Development: Corporate Capitulation and the Impact on Washington County, Oregon



Chris Christensen
Housing, Real Estate & Mortgage Specialist - Condominium Conversion Project Manager - Assumption & Loss Mitigation Specialist, Political Pundit and 2020 U S. Congressional Candidate

Published Jul 7, 2024

"*We soon found that the white men were growing rich very fast and were greedy.*"

- Chief Joseph, (or Hin-mah-too-yah-lat-kekt), Tribal leader of the Wallowa Band of Nez Perce

In the heart of Oregon's Silicon Forest, Intel's relentless advancements have epitomized the concept of leapfrogging technology. Intel CEO Pat Gelsinger often references **Moore's Law** in his speeches to investors and analysts, highlighting the company's commitment to doubling the number of transistors on a microchip approximately every two years. Yet, while the company's cutting-edge innovations have driven progress, they have also sparked a chain reaction with potentially significant economic and ecological ramifications for the surrounding communities where Intel's "fabs" are located.

The rapid pace of Intel's technological growth has, predictably, fueled a real estate frenzy in every Washington County, Oregon community. Bigger cities like Beaverton, Hillsboro, and Tigard are cashing in on the "micro-boom," and even small towns such as Banks, North Plains, Forest Grove, and the county's unincorporated agricultural areas are inflating a precarious bubble that could spell an economic and ecological "micro-bust" for the region and the state.

Technological Leapfrogging



Intel's Silicon Chip Manufacturing Footprint in Hillsboro, Oregon is Currently Undergoing a Major Expansion With Financial Assistance from the Federal CHIPS Act and Oregon Taxpayers. (Image Credit: Chris Christensen)

For some, Intel's Hillsboro campus stands as a beacon of technological prowess, consistently announcing advancements in integrated circuitry. The company's commitment to innovation has resulted in a near-constant stream of newer, faster electric circuits, each "generation" essentially rendering prior products as inferior or even functionally obsolete. With the rapid emergence of artificial intelligence and robotics, Intel is now poised to lead the sector for many years to come.

Or are they?

The Pacing Problem and Intel's High NA EUV Technology

A critical concept in technological innovation is the pacing problem, where the rate of technological advancement outstrips the ability of industries, governments, and society to adapt. Remember the 8-track tape player or the laser disk? **Intel's recent acquisition and implementation of High NA EUV (Extreme Ultraviolet) technology** is a prime example. This cutting-edge technology, which promised unprecedented advancements in semiconductor manufacturing, is already being overshadowed by **the anticipated future arrival of Hyper NA EUV technology.**

The relentless drive to stay ahead in the technology race begs the question: where will it all end? Each new leap in technology renders previous innovations obsolete almost as soon as they are introduced, creating a perpetual cycle of development and obsolescence. This breakneck pace strains the technological ecosystem and exacerbates the economic and environmental pressures on the surrounding communities.

The Real Estate Boom: Look Before You Leap

The influx of high-paying tech jobs at Intel has attracted a wave of new residents eager to capitalize on the opportunities presented by the booming tech sector. This sudden surge in population has driven up housing demand, leading to skyrocketing property prices in nearby communities such as Hillsboro, Banks, Gaston, North Plains, and Forest Grove. Once quiet agricultural areas in Washington County are now hotbeds of real estate speculation, with developers scrambling to cater to the burgeoning demand. The City of Hillsboro, for example, recently **approved over 8,000 new homes to be**

developed in South Hillsboro, once an agricultural mecca, with thousands more planned.

While this real estate boom has brought economic growth and prosperity to the region, it has also sown the seeds of potential catastrophe. The rapid pace of development has put immense pressure on local infrastructure and resources, straining the delicate balance between growth and sustainability. As property values soar, long-time residents are priced out of their communities, increasing social and economic disparity.

Drain the Swamp? The Role of Oregon's Politicians

A significant contributing factor to this unchecked development is the role played by Oregon politicians, swayed by **Intel's corporate wealth**. In exchange for the promise of higher tax revenues, these policymakers have sacrificed the **foundational principles of Oregon's land use planning system. Established to protect farmland, forests, and open spaces** while promoting orderly urban development, these principles have been sidelined in favor of ill-gotten economic gains. This abandonment of sustainable land use policies not only accelerates climate change but also **jeopardizes the environmental integrity of the region.**

The Concept of Leapfrog Development

Leapfrog development can be visualized through the metaphor of a frog leaping from lily pad to lily pad across a pond. In this context, the "lily pads" represent the various communities in Washington County—such as Beaverton, Hillsboro, Tigard, North Plains, Banks, Forest Grove, Cornelius, and Gaston. Instead of a gradual, cohesive expansion from one area to the next, development leaps over existing communities, creating new pockets of urbanization in a disjointed and sporadic manner.

This type of development results in patches of urban sprawl, often leaving significant gaps of undeveloped or underutilized land in between. These gaps disrupt infrastructure continuity, making providing consistent public services, managing traffic, and maintaining community cohesion challenging. The leapfrog metaphor vividly illustrates the haphazard nature of this growth, highlighting the inefficiencies and long-term challenges it introduces.

The Detrimental Impact of Leapfrog Development

Leapfrog development, characterized by rapid, sporadic, and disjointed urban sprawl, has far-reaching negative consequences for suburban and agricultural communities. The effects are multifaceted and profoundly detrimental, impacting traffic, congestion, crime rates, infrastructure needs, and the preservation of farms and forests.

- Traffic and Congestion

The influx of new residents and the expansion of residential areas significantly increase traffic and congestion. Roads that were once sufficient for rural communities are now overwhelmed, causing longer commute times, higher transportation costs, and increased pollution. The lack of adequate public transportation exacerbates these issues, significantly increasing daily travel, which is a burden for residents.

- Crime Rates

Rapid and poorly planned unchecked growth can also contribute to rising crime rates. As new neighborhoods emerge without the necessary social and community infrastructure, law enforcement resources are stretched thin. The absence of cohesive community planning can lead to social fragmentation and increased opportunities for criminal activities, undermining the safety and security of these newly developed areas.

- Infrastructure Needs

The sudden surge in population places immense strain on existing infrastructure. Water and sewage systems, schools, hospitals, and emergency services need help to keep up with the rapid growth. The cost of upgrading and expanding these services often falls on local taxpayers, leading to increased financial burdens and potential declines in the quality of public services.

- Preservation of Farms and Forests

One of the most significant impacts of leapfrog development is the loss of farmland and forests. The encroachment of urban sprawl threatens Oregon’s rich agricultural heritage and natural landscapes. Once fertile lands are paved for housing developments and forests are cleared, leading to habitat destruction, loss of biodiversity, and increased greenhouse gas emissions. This disrupts local ecosystems and undermines the state’s commitment to environmental sustainability.

- Water and Power Consumption: An Unsustainable Path

Another critical issue exacerbated by Intel's expansion and the accompanying real estate boom is the inevitable massive increase in water and power consumption. High-tech industries, particularly semiconductor manufacturing and data centers, are notoriously resource-intensive. Intel's operations in Hillsboro require vast amounts of water for cooling and manufacturing processes, straining local water supplies. Similarly, the power demands of these facilities are immense, further burdening the region's energy infrastructure.

As companies like Intel and other data centers continue to grow and expand in Washington County, the demand for these resources will only escalate. This increased consumption is unsustainable both economically and environmentally. Local homeowners already feel the pinch as utility rates skyrocket to meet the burgeoning industrial demand. **The competition for water between industrial uses and residential needs is becoming increasingly fierce, with industrial consumption threatening to outpace homeowners' needs.** This imbalance drives up prices and raises concerns about long-term resource availability and sustainability.

The Core Problem: Irresponsible Planning and Land Use Patterns



Oregon's Urban Growth Boundary Has Long Been the Dividing Line Between Unchecked Urban Sprawl and the Region's Agricultural and Rural Land (Image Credit: Reddit)

Leapfrog development and the resulting urban sprawl represent a terrible, politically ignorant, and egregious example of irresponsible planning and land use patterns. This

unchecked expansion is a land grab orchestrated by greedy corporate interests and the politicians they influence. The crux of the issue lies in the need to limit leapfrog development and urban sprawl by maintaining the integrity of the urban growth boundary and adhering to existing land use limitations and zoning regulations.

Expanding the urban growth boundary and relaxing zoning laws benefit developers and corporations at the expense of the community and the environment. This short-sighted approach undermines the foundational principles of Oregon's land use planning system, which were designed to protect the state's unique landscapes and promote sustainable development.

The Decay of Portland: A Case Study in Failed Political Policies



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Image Credit: Chris Christensen - Image of Homeless Person Sleeping on Sidewalk near West Burnside Street in downtown Portland, Oregon

Compounding the issue is the decay of Portland, the region's urban core. Over the last decade, failed liberal political policies and capitulation to corporate and criminal interests have deteriorated the city's economic and cultural vitality. Rather than addressing the core issues within Portland and restoring it to its previous grandeur, political efforts have instead focused on enabling leapfrog developments farther and farther from the city center.

Portland's decline serves as a cautionary tale. The city's neglect has driven residents and businesses to seek opportunities in the outlying areas, exacerbating urban sprawl and placing additional pressure on suburban and agricultural communities. This shift undermines Portland's potential for economic and cultural revitalization and threatens the preservation of the outlying regions' natural, pristine beauty and agricultural significance.

The Looming Catastrophe: An Economic and Ecological Bust

The focus on providing corporate welfare to businesses such as Intel to attract cutting-edge technology to the region has created an unsustainable growth model that risks imploding with dire consequences. **If left unchecked, the current trajectory could culminate in a historic economic and ecological bust for the entire region.**

Economically, the inflated real estate market bears eerie similarities to past bubbles that have burst with devastating effects. The speculative frenzy surrounding property in Washington County is built on the assumption of perpetual growth and prosperity. However, as history has shown, such growth is rarely sustainable. A sudden downturn in the tech sector or a shift in corporate strategy could leave the region grappling with plummeting property values, foreclosures, and a shattered local economy.

Unchecked development threatens to irreparably harm the region's natural landscape. The agricultural areas that have defined Washington County for generations are being swallowed by urban sprawl, leading to habitat destruction, loss of biodiversity, and increased pollution. The environmental degradation resulting from rampant development could undermine the very foundations of the community, leaving behind a legacy of ecological devastation.

A Call for Caution and Sustainable Growth Policies

As Intel continues to push the boundaries of technological innovation, the surrounding communities and policymakers must adopt a more cautious and sustainable approach

to growth. The allure of quick profits and rapid advancements must be tempered with a deep understanding of the long-term consequences. Just as the relentless pursuit of leapfrogging technologies can lead to obsolescence and instability, leapfrog development can also result in fragmented communities and environmental degradation.

Both technological leapfrogging and leapfrog development share a common flaw: focusing on short-term gains at the expense of sustainable, cohesive progress. The rush to implement the latest technologies without fully considering the pacing problem mirrors the haphazard expansion of urban areas, creating patches of development that strain infrastructure and resources. The lack of strategic planning and foresight can lead to catastrophic outcomes in both cases.

For Washington County, the solution lies in curbing the sprawl by enforcing strict land use policies that prevent urban growth boundary expansion. Emphasis should be placed on revitalizing Portland, addressing its economic and social challenges, and restoring it to the vibrant urban core it once was. This approach not only preserves the natural and agricultural beauty of the surrounding areas but also fosters a more ecologically sustainable, resilient, and responsible community.

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Chris Christensen 1mo
Housing, Real Estate & Mortgage Specialist - Condominium Conversion Project Manager - Assumption & Loss Mitigat…

https://www.usnews.com/news/best-states/oregon/articles/2024-02-25/a-housing-shortage-is-testing-oregons-pioneering-land-use-law-lawmakers-are-poised-to-tweak-it

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Miriam Hanes

From: Chris Christensen [redacted]
Sent: Tuesday, July 9, 2024 12:45 AM
To: Metro 2040
Subject: [External sender]Leapfrog Development: Corporate Capitulation and the Impact on Washington County, Oregon

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Leapfrog Development: Corporate Capitulation and the Impact on Washington County, Oregon
https://www.linkedin.com/pulse/leapfrog-development-corporate-capitulation-impact-chris-christensen-hcutc?utm_source=share&utm_medium=member_android&utm_campaign=share_via

Miriam Hanes

From: Michelle Christian [redacted]
Sent: Thursday, August 22, 2024 6:00 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]Oppose Sherwood West Growth Plan

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To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely, Brent and Michelle Christian

[redacted]

Sent from my iPhone

August 19, 2024

METRO
Urban Growth Management Team
600 NE Grand Ave,
Portland, OR 97232

RE: Urban Growth Report, Draft 2024

Dear Council Members,

I am writing to provide comment on the Draft Urban Growth Report pertaining to the City of Sherwood's proposed Sherwood West Concept.

I would first like to thank the members of the Council and their staff for their efforts in managing and planning for growth in the Metro area. I am sure it is often a thankless task, but one which is greatly needed by the community.

I have carefully reviewed the Draft and have a number of concerns about the proposed expansion by the City of Sherwood.

1. **The Draft does not incorporate nor analyze the figures upon which the Concept is based.** Instead, it seems to simply analyze the "readiness" of the City for expansion. And although the City clearly perceives itself as ready to expand - the question remains to whether it should. The numbers strongly suggest, if not dictate, that the big growth this area experienced in recent years has crested and we are now in a period of declining growth. The proposed expansion is not warranted.
2. **The numbers provided by Sherwood are inaccurate and self-serving.** Sherwood has previously egregiously over-estimated growth populations. For example, the high school was bonded and built on the basis of an expanding population. It has cost the area residents millions of dollars. And it was overbuilt. The high school has a capacity for 2,400 students. It currently has 1,704 enrolled students. According to the documents submitted in 2017 for UGB expansion, the City forecast an initial enrollment in 2020 of 1,870 students with a further forecast of 2,400 students by 2045. In reality, not only did the high school not have 1,870 students in 2020, it STILL doesn't have 1,870 students and won't any time in the foreseeable future. Predicted enrollments are declining and significantly so. It is now anticipated that the 2032 enrollment will only be 1,530. The point is that the City has shown that its numbers for growth to support the expansion are at best inaccurate and at worst purposely overstated. They should not be relied upon in making your decisions.
3. **METRO has its own data to rely upon and it does *not* support an expansion in Sherwood.** As required by Ordinance No. 21-1457, the Council will need to rely upon current data for planning. Exhibit A of the Ordinance was duly accepted and adopted as such current data. It sets forth the population of Sherwood as 19,747 based on the 2020 Census and forecasts a population of 20,118 in 2030, and 20,562 in 2045 respectively. An increase of some 815 persons in the next 20 years simply cannot support an expansion of 3,120 housing units.
   Moreover, as intended, the population data contained in the Ordinance has been used and relied upon by other municipalities and cities, such as Portland (Ordinance 19157), Multnomah County

(Ordinance 1323), and Lake Oswego (Lake Oswego City Council Meeting July 16, 2024), in analyzing their own expansion needs. Likewise, METRO should also rely on its own data in determining which option to choose from among those laid out in the Draft UGB Report - especially given the City of Sherwood's propensity to exaggerate its figures.

4. **Farmland is vital to all and cannot be replaced.** To state the obvious, we all depend upon farms to produce the food we eat. The verdant soil of the farmland around Sherwood is a precious commodity. Once housing or commercial entities are sited on farmland they are never recaptured for agricultural use. The Draft UGB Report, at best, gives lip service to the need to maintain and protect farmlands. Especially in these days of heightened awareness of climate changes and the value of locally produced foodstuffs, it is difficult to support the removal of productive land. Even more to do so based upon the lack of a verifiable need for housing and commercial development. The UGB Roundtable perspectives on agricultural demand, page 57 of the Report, also positively reflects the value of farmland for employment and negatively notes the "increased cost and carbon footprint of pushing food production outside of Oregon." Commercial expansion should first use those areas already so designated and then those areas that cannot be reasonably used for food production.
5. **The proposed light industrial use / employment area is mis-characterized.** Page 56 of the Draft UGB Report states that the Oregon Semiconductor Taskforce found that, statewide, there was a need for four 50–100-acre sites for semiconductor manufacturing. Four. Statewide. Not a regional need as stated in the Report (see page 57). The Report seems to suggest that the proposed area has unique characteristics making it suitable for commercial development. One such characteristic is its proximity to the highway. The Report apparently takes this at face value. However, anyone who has tried to get to Interstate 5 or Interstate 205 from the proposed area can attest to the existing congestion and traffic woes in such an endeavor. Simply put, the Report fails to recognize or analyze the *lack* of highway accessibility.
6. **The residents of Sherwood, the people, do *not* want this expansion.** The City of Sherwood's own poll regarding the public support for this expansion is not adequately represented in the Report. The City's poll showed that 84% of respondents agreed or strongly agreed with the statement:

   > The Sherwood city council should ***not*** expand the city and preserve natural areas and farmlands in the Sherwood West area. (Sherwood West Poll Results (Mayor) Tim Rosener August 16, 2021). Emphasis added.

Thank you for your time and attention in reviewing these concerns. I can only hope that these comments, along with other public input, will have a meaningful impact on the Council's decisions. As John Muir once so aptly stated, "Not blind opposition to progress, but opposition to blind progress."

Respectfully,

Kimberly R. Cobrain

Miriam Hanes

From: [redacted]
Sent: Tuesday, August 20, 2024 10:31 AM
To: Metro 2040; Marissa Madrigal; Lynn Peterson; Gerritt Rosenthal; Mary Nolan; Juan Carlos Gonzalez; [redacted]; Christine Lewis; Duncan Hwang
Subject: [External sender]Comments on Draft 2024 Urban Growth Report
Attachments: Comments of DRAFT Urban Growth Report.docx

Importance: High

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Please find attached my comments regarding the Draft 2024 Urban Growth Report. If you have any questions, please let me know.
Thank you for your consideration.

Kimberly R. Cobrain
Sherwood, Oregon

Miriam Hanes

From: Mallory Cochrane <[redacted]>
Sent: Friday, August 9, 2024 1:36 PM
To: Metro 2040
Cc: Peter Foster; [redacted]; [redacted]
Subject: [External sender]Please Support the Sherwood West Expansion Plan

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Dear Metro Council Members,

My name is Mallory Cochrane, owner and founder of Birch Social - a consulting, marketing and events business dedicated to supporting the needs of small farms and food businesses in Oregon. My company is based in Old Town Sherwood, where I am also a resident and home owner.

I am writing to ask that you please **approve the Sherwood West Concept Plan as proposed by the Sherwood City Council and widely supported by the Sherwood community**. This Concept Plan was a result of two years of planning and public input to decide the future of our unique and special city.

As a native Oregonian, I intentionally chose to raise my family in Sherwood because of the **small town character, sense of community and amazing education system and public services**. Many other people are attracted to Sherwood for these same reasons. However, we need **more housing** for these new residents and increased **employment opportunities** to keep people working in our community rather than commuting elsewhere.

With inevitable population growth on the horizon, it is critical that **smart growth** practices be applied to the Sherwood West area so that we are future-proofing development in a way that **enhances our community, increases economic prosperity and protects farmland, natural spaces and resources**.

As outlined in the Concept Plan, I believe that Metro Council should:

- add 340 net acres of **residential land** to the Urban Growth Boundary (UGB)
    - *Comment: Our region will add approximately 315,000 new residents and 137,000 new jobs over the next 20 years under a baseline growth scenario.*
- add 130 net acres of **flex industrial land** to the UGB
    - *Comment: Sherwood West is well suited to capture new and expanding demand for industrial space due to its favorable parcel size, ownership, and low slopes.*
- add 135 net acres of **commercial and hospitality land** to the UGB
    - *Comment: Economic development requires a land supply that enables specific industries to thrive.*

Again, I request that the Metro Council stand with the residents and businesses of Sherwood and **approve the Sherwood West Concept Plan as proposed.** I would greatly appreciate a response with the Metro Council's position on this issue. I appreciate your time and thoughtful consideration.

Sincerely,
Mallory Cochrane

--
Founder
Birch Social
[redacted]
Celebrating the power of local food from field to table

To: Metro Council President Peterson
Metro Councilor Ashton Simpson, District 1
Metro Councilor Christine Lewis, District 2
Metro Councilor Gerritt Rosenthal, District 3
Metro Councilor Juan Carlos González, District 4
Metro Councilor Mary Nolan, District 5
Metro Councilor Duncan Hwang, District 6

CC: Marissa Madrigal, Chief Operating Officer, Metro
Kristin Dennis, Chief of Staff to Metro Council
Catherine Ciarlo, Director of Planning, Development and Research, Metro
Malu Wilkinson, Deputy Director of Planning, Development and Research Metro
Eryn Kehe, Land Use Manager, Metro
Ted Reid, Land Use Manager, Metro

August 23, 2024

1000 Friends of Oregon appreciates the opportunity to participate in the Urban Growth Stakeholders Roundtable, comment on the urban growth report, and partner with Metro on multiple areas of alignment such as unlocking more funding for critical infrastructure needs, addressing our housing affordability crisis, and bringing more mobility options for Oregonians in a 2025 transportation package.

The Metro Council has an opportunity to set the region up for success for generations to come if it uses one of its strengths: data-driven long-range land use planning. Strong land use planning invites a collective imagination to create the best future possible for all residents, ones that currently call the region home and ones that will call this region home. But the best future possible has always been, and will always be, under threat by a select few seeking to exploit the region's limited resources: whether it be our world-class soils, the water we drink, the air we breathe, or the health and ingenuity of our people.

1000 Friends of Oregon shares our 5 major takeaways for how to set our region up for success as you read the draft urban growth forecast:

1. Metro Council should focus on how to improve the quality of life for all residents now and into the future.

2. The region's natural resources and low weather extremes offer us a position of strength if Metro decides to steward them well.

3. The biggest bang for buck and the quickest way to regional success is to build upon our existing footprint, support our regional network of main streets, and restore the core.

4. Prepare for "Operational Efficiency" and protect people's livelihoods.

5. Raw land is the least of our issues when it comes to setting the region up for success. Land readiness on the other hand…

***

1. Metro Council should focus on how to improve the quality of life for all residents now and into the future. We must remember the entire purpose of good land use planning and community development: to enhance the health, safety, and well-being of all Oregonians. We lose sight of this purpose when conversations are reduced to debating the number of acres. Rather, we should focus on creating measurable and meaningful indicators for success to guide our land use decisions and the limited public and private dollars we have. The region's indicators for success should include:

> **Life Expectancy by Zip Code.** Zip codes still serve as an indicator for how long and how well someone lives in the greater Portland area. Someone's life expectancy in Multnomah County (79.40 years) is less than those living in Clackamas County (80.90 years) and even less than Washington County (82.60 years[1]). Metro Council and staff should be keenly aware of this discrepancy across counties and prioritize resources and staff efforts to help areas that have the lowest life expectancy in the region. Blue Zones research could guide Metro's policy and funding decisions to better understand how to improve life expectancy and quality of life for residents in the region.
>
> **Household Costs/Affordability**. The largest household expense for the average resident is housing. The second largest household expense is transportation. Utilities and food also appear as common expenses. Metro should make land use decisions to help cut down on these household expenses for the average resident. If Metro decides to allow urban growth boundary expansions for residential, industrial, and commercial land where the majority of residents are going to feel the need to drive everywhere,

[1] Robert Wood Johnson Foundation, Accessed August 2024. https://www.rwjf.org/en/insights/our-research/interactives/whereyouliveaffectshowlongyoulive.html

Metro has made a choice to increase the household costs for the average resident. Urban growth boundary expansions not only increase driving at the edge, but they draw away investments that could be made where people already live to increase their transportation options. If Metro decides to fund planning and infrastructure efforts that allow the majority of residents to walk, roll, and bike to where they need and want to be, Metro has made a choice to decrease the household costs for the average resident.

Number and Quality of Age Friendly Communities. As presented to the Urban Growth Stakeholders Roundtable, Oregon enjoys a significant number of residents who are older in age. As our residents age, their needs change. It's no longer easier to drive where they need to get to; incomes become fixed and possibly lower than where they were working full time; and their social and civic participation styles may change.

As the World Health Organization and AARP's Livable Communities note, "age-friendly communities are places where people of all ages [and abilities] feel supported and included, and where older people can age well[2]." Age-friendly communities include three major components: physical (e.g., housing, transportation, outdoor spaces, and amenities); social (e.g., civic representation and participation, community involvement); and service (e.g., health care, emergency response). To create age-friendly communities, the Metro Council and staff should support land use decisions, planning grants, and infrastructure requests that create walkable and rollable neighborhoods where people are able to age in place, get to where they need and want to go safely and on their own, and be connected with their community on their own terms[3]. Orenco Station is a great example of incorporating age-friendly principles into planning and development by combining residential and commercial uses alongside pedestrian, bicycle, and transit investments; in contrast, planning that results in commercial and industrial development with large parking lots requires residents to use automobiles to safely navigate the community and thereby fails to create an age-friendly community.

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[2] AARP, Livable Communities, https://www.aarp.org/livable-communities/network-age-friendly-communities/

[3] Research demonstrates that placement in a nursing home/care facility drastically reduces the life expectancy for the individual. It also adds significant costs to the individual and any family members who may be paying for this change. A monthly rate for a studio in a housing facility that provides supervision or assistance with activities of daily living is approximately $6,161.91 for the Portland area (compared to the national average: $4,999.01 per month). https://www.newyorklife.com/resources/financial-calculators/costs-of-long-term-care

Number of Communities of Concern in EPA's Environmental Justice (EJ) Screen (or regional equivalent). The Metro Council and staff should be keenly aware of the number and location of communities who are burdened with environmental pollution, climate change risks, health disparities, and critical services gaps. Often, communities ranked in EJ screen are communities that are majority low-income, speak languages other than English, qualify for free and reduced lunch, and are people of color. Metro Council and staff should set a goal to have zero communities in the greater Portland area rank highly in the EJ Screen and develop policies and align investments to reach this goal. Metro Council and staff should reject urban growth boundary expansions and other investment strategies that draw resources away from investing in communities that rank highly in EJ screen.

2. The region's natural resources and low weather extremes offer us a position of strength if Metro decides to steward them well.

The greater Portland area is positioned to be an oasis of refuge from some of the most extreme negative impacts of climate change. This is a major advantage when drawing residents and businesses to the region (even noted by the private sector[4]). While we have much work to do to adapt to the changing conditions to protect the health and safety of residents, the Pacific Northwest is rated as one of the most climate resilient areas in the United States.

Metro Council and staff should build upon our unique position by stewarding our natural resources not just through voter-approved parks and nature bond measures, but through its regulatory authority in its land use decisions. For example, development that does not require high-nutrient soils should not be permitted on these soils[5]. Likewise, Metro Council and staff should coordinate with other natural resource agencies (Soil and Water Conservation Districts, Department of Agriculture, Department of Fish & Wildfire, etc.) to develop a clear, streamlined approach toward monitoring the quantity and quality of our water sources and air sheds. Each of these water sources and air sheds have carrying capacity limits (recognized in Land Use

[4] Visit Quicken Loans for an example of how Portland, Oregon's environmental stewardship and temperate climate risks are used to guide private investment. https://www.quickenloans.com/learn/best-places-to-climate-change

[5] Oregon's own Climate Action Commission has recommended "no net-loss" policy for high-quality farmland to reach our climate mitigation and resilience goals. Institute for Natural Resources at Oregon State University for the Oregon Global Warming Commission. September 26, 2023. https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/6578da822755f905770c5901/1702419079574/2023-Natural-Working-Lands-Report.pdf

Planning Goal 6). Urban growth expansions should consider the carrying capacity of water resources and airsheds in order to assess and guide growth in the region. For example, if one company within an airshed applies and is awarded a permit to emit carbon monoxide to the top of the allowable limit for the entire airshed, Metro Council and staff must include that information in guiding growth away from that airshed to protect the health of residents and help businesses avoid violations of, at minimum, Clean Air Act and/or Land Use Planning Goal 6.

3. The biggest bang for buck and the quickest way to regional success is to build upon our existing footprint, support our regional network of main streets, and restore the core.

Metro Council and staff must ensure the region contributes to addressing the housing production shortfall and the affordability crisis through a holistic approach (remembering the indicators for successful quality of life including household cost/affordability). Building at the edges won't set the region up for success. And, Metro Council and staff should reject any attempt to expand the boundary or use limited public dollars without any element of guaranteed affordable housing.

We have a limited number of dollars for infrastructure, limited amount of labor for construction, and limited materials for construction. We urge Metro to prioritize developers and/or local jurisdictions who are building partnerships around transformative, catalytic (re)developments as part of holistic land use planning. Some notable opportunities to invest in our existing footprint, support our regional network of main streets, and restore the core include but are not limited to:

(Re)Development	**# of Homes (Est.)**	**Climate Friendly Area? (Y/N)**	**Guaranteed Affordability Component? (Y/N)**
Lloyd Center	5000	Y	Y
Broadway Corridor	2500	Y	Y
OMSI Revitalization District	900	Y	Y
Albina Vision Trust	1100	Y	Y
Hayden Island/Jantzen Beach (I-5 Bridge Corridor)	2000	Y (with light rail and complete street investments)	Y

Rockwood	TBD	TBD	TBD
Jade District	TBD	Y	Y
Gateway	TBD		
Hillsboro's Block 67	269	Y	Y (if the City of Hillsboro allows for affordable housing)
Willamette Falls Revitalization (West Linn and Oregon City's McLoughlin Blvd Enhancements)	TBD	TBD	TBD
122nd and Stark	TBD	TBD	TBD

4. Prepare for "Operational Efficiency" and protect people's livelihoods.

As we enter an era of mainstream artificial intelligence, more jobs in more sectors of our economy are vulnerable to automation. From manufacturing to advertising, the future is uncertain. To bring more certainty to residents and to be ready for changing technology and economic sectors, Metro and local jurisdictions must prioritize quality of life for its residents over company profits as an indicator for success. In doing so, the Metro Council and staff must be surgical about allowing any expansions for industrial lands and requiring enforceable, specific conditions on any industrial lands to create lasting high-quality jobs for residents and minimize the probability and impacts from mass layoffs due to automation and/or outsourcing.

If the Metro Council allows industrial developers to pave over our working lands for robots, residents lose their ability to provide for themselves, their families, and contribute to the region through their employment. Our region has suffered from broad definitions of industrial lands that do not result in development that brings high-quality jobs for residents. Instead, it adds a patchwork of uses: from gas stations to big-box chain retail stores to strip malls to truck stops. Our region has suffered from our lack of discipline to protect our existing industrial lands for development that can bring high-quality jobs, especially manufacturing jobs. While we still have a reported surplus of industrial lands, now is the time to protect them with specific, enforceable conditions on any industrial lands in our region.

5. Raw land is the least of our issues when it comes to setting the region up for success. Land readiness on the other hand…

The urban growth report's forecast includes a very optimistic outlook on utilizing vacant office buildings and land throughout the region, notably downtown Portland. We also see vacant or nearly vacant office parks and retail areas and their accompanying large swaths of empty parking lots throughout the region. Metro should focus its policy choices and investments on (re)developing and revitalizing these areas; they already have infrastructure in place and are located in existing communities. Recent layoffs by large international corporations illustrate that worldwide business cycles and other factors influence investment decisions, not land supply.

Even with the optimistic and arguably inflated job growth forecast, the urban growth report notes there is a surplus of industrial land even assuming the high growth scenario. We have heard for well over a decade that land readiness - bringing land to Tier 1 - is a main challenge for local jurisdictions. We also know that multiple cities and towns are faced with budget issues, whether it's structural budget deficits like Washington County and City of Portland or whether it's smaller towns that are seeking a larger revenue base like the City of Sherwood.

1000 Friends of Oregon understands and sympathizes with the funding and financing challenges local jurisdictions face when bringing land to Tier 1 readiness and maintaining this infrastructure. It's a motivating force behind our advocacy to work with our statewide membership to secure infrastructure dollars for housing construction (SB 1530 (2024), Senator Kayse Jama; HB 4134 (2024), Representatives Elmer, Gomberg, and Helfrich; and a housing project revolving loan fund (championed for multiple sessions by State Representative Pam Marsh), and to bring main street revitalization funds to towns across Oregon, especially for smaller jurisdictions.

What we know is that adding raw land doesn't pencil for local jurisdictions. What may seem like a revenue boon comes with newer, significant expenses: brand new sewer, water, fiber optic cables, roads, lighting. Suddenly, the city is back in the same predicament it started in: budget shortfalls. We are committed to working with cities and towns on real solutions to funding and financing for land readiness and core public services that are paramount to enhancing our quality of life for all Oregonians. We hope we can count on Metro's leadership to daylight the real problems and real solutions to this challenge.

***

We appreciate Metro Council and staff's time in assembling the draft urban growth report's forecasts, presenting to multiple stakeholder groups, and offering an open line of communication throughout the process. None of us know what the future holds in store; tomorrow is just a rumor after all. But, 1000 Friends of Oregon is committed to working with our statewide membership to choose land conservation and development approaches - policy decisions and funding and financing strategies - to create a future that we are proud and excited to live in.

We are available to meet Metro Council and staff to discuss these key takeaways. We are also happy to host Metro Council or staff in meetings with our partner organizations who are committed to creating a better future for all residents, now and into the future.

Sincerely,



Samuel Diaz
Executive Director

Miriam Hanes

From: Eryn Kehe
Sent: Friday, August 23, 2024 10:43 AM
To: Miriam Hanes
Subject: FW: [External sender]5 Takeaways on Draft Urban Growth Forecast from 1000 Friends of Oregon
Attachments: 2024 August - 1000 Friends of Oregon Comment on Metro's Draft Urban Growth Forecasts.pdf

We can accept this late.

Eryn Deeming Kehe, AICP | Metro | Urban Policy and Development Manager
My gender pronouns: she her, hers | [redacted]

From: Sam Diaz <[redacted]>
Sent: Friday, August 23, 2024 10:39 AM
To: Marissa Madrigal <[redacted]>; Kristin Dennis <[redacted]>; Catherine Ciarlo <[redacted]>; Malu Wilkinson <[redacted]>; Eryn Kehe <[redacted]>; Ted Reid <[redacted]>
Cc: Mary Kyle McCurdy [redacted]
Subject: [External sender]5 Takeaways on Draft Urban Growth Forecast from 1000 Friends of Oregon

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Good morning and happy Friday Marissa, Kristin, Catherine, Malu, Eryn, and Ted,

I wanted to personally send you 1000 Friends of Oregon's 5 takeaways on the draft urban growth forecast. I've been told the urban growth report isn't a policy decision by itself, but may be used to inform future policy and funding decisions. We hope these 5 takeaways can be helpful in shaping actions to create the best future possible for residents of our region.

More than happy to head to Metro or have you here at the 1000 Friends of Oregon office to chat through these takeaways and hear your perspective. Just let me know if you'd like to schedule something.

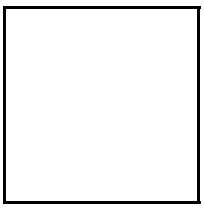
Thanks so much for your service.

Sincerely,
Sam Diaz
Executive Director

1000 Friends of Oregon
Pronouns: he/him

Office: [redacted]

Direct: [redacted]



Support a beautiful, bountiful Oregon for generations to come…*join us today*!

Miriam Hanes

From: Charlie Digregorio <[redacted]
Sent: Tuesday, July 23, 2024 3:20 PM
To: Metro 2040
Subject: [External sender]Zoom Meeting Commentary
Attachments: Metro Letter UGB.docx

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Please accept the attached letter for the record due to my absence from the zoom meeting.

Thank you, Charlie Digregorio

July 23, 2024

Attn: Urban Growth Management Team

METRO

600 NE Grand Avenue

Portland, OR 97232

Sent Via Email – [redacted]

RE: Sherwood West UGB Expansion Plan Support

To Whom It May Concern:

As a former property owner in the Sherwood West area, and in agreement with relatives who still own properties there, this letter is in strong support of the Metro Council's efforts to reasonably expand the UGB. Recommendations from the Urban Growth Report findings are clear. After years of arduous studies and extremely detailed analyses, the Metro Council must finally act on next step growth management decisions.

A great deal of preparation and investment has been made in the Sherwood West area to accommodate necessary housing growth and affordability. The list of improvements in recent years is lengthy. Likewise, economic and job growth go hand-in-hand with future essentials. It is long past time to adopt the completed concept plan for proposed expansion within the presently designated urban reserve area. Anything less, as suggested by self-serving community members like the Sherwood Farm Alliance, would be a further irresponsible obstruction to the realities of future progress.

In place of my attendance at the upcoming Zoom meeting, thank you for including the above comments as a matter of record.

Sincerely,

Charles Digregorio

[redacted]

Portland, OR 97239

To: Metro

My name is Peter Dinsdale.

I was raised in Sherwood and my family's agriculture business is on the edge of the proposed UGB expansion area.

I am a supporter of the West of Sherwood Farm Alliance.

We were shocked and dismayed when Metro Councilor Juan Carlos Gonzalez announced his support for the controversial proposed Sherwood UGB expansion earlier this month.

By doing that, he made it perfectly clear that he doesn't have the slightest interest in the information, analysis, and values of the people who live here, or possibly from anyone, anywhere in the region.

In 2021, people in and around Sherwood responded to an online survey about this proposed UGB expansion.

84% of the respondents agreed, with this statement:
"*The Sherwood city council should NOT expand the city and* [should instead] *preserve natural areas and farmlands in the Sherwood West area*."
About 75% of respondents agreed strongly.

Let me repeat those numbers: 84% opposed the expansion and 75% strongly. That was the same result from a survey taken five years earlier.

Before you dismiss this opposition as the sentiments of a bunch of NIMBYs, you might consider some of the facts that we have been presenting to you at your monthly meetings:

FACT: Housing will be unaffordable to the people taking the jobs in the expansion area, causing more commuting, heavier traffic on our already burdened roads, and more pollution, which will NOT help in reducing greenhouse gas emissions.

FACT: Metro approved a UGB expansion in 2017, at Sherwood's request to build a new High School on 82 acres, based on projections of soaring enrollment. Today, after spending $248 million in tax dollars, the School District's consultants expect enrollment to decline within seven years.

FACT: The expansion will cause the loss of some of the best farm and forestland in the world. The result will be the loss of countless agricultural jobs and damage to Chicken Creek, which helps maintain the water quality in the nearby National Wildlife Refuge.

We are counting on you - unlike Councilor Gonzalez - to actually listen to the citizens, hear the facts, and reach an independent judgment.

Thank you for your service.

Peter Dinsdale

Miriam Hanes

From: Julie Horowitz <[redacted]>
Sent: Wednesday, August 21, 2024 5:22 PM
To: Metro 2040
Subject: [External sender]2024 Sherwood UGB decision
Attachments: Metro Peter Dinsdale.docx

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

To Whom it Concerns,

I am a citizen of Sherwood and have attached my letter opposing the UGB expansion in Sherwood OR

Peter Dinsdale

Miriam Hanes

From: Shannon Dittler <[redacted]>
Sent: Tuesday, June 4, 2024 6:42 AM
To: Metro 2040
Subject: [External sender]Urban Growth Boundary.

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Hell no, I don't want it to get larger. That is exactly what people who have moved here want. They want to make it larger so they can snatch up those investment properties.
People from outside of Oregon came here with their deep pockets to buy up Portland and make it grow.
We the people of Oregon don't need their deep pockets and wealth. Portland laws were put in place long ago by people with the foresight to realize people would want to do this to our GEM.
Hell no, tell them go invest elsewhere. Portland is perfect the way it is.

Miriam Hanes

From: Farmland First [redacted]
Sent: Sunday, August 18, 2024 9:46 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]Testimony in opposition to Sherwood expansion

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To whom it may concern:

Our nonprofit organization, Farmland First, is writing to convey our strong opposition to the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres.

This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes.

In 2022 Metro projected Sherwood would grow by a scant 3% over the coming decades. The Sherwood School District has forecasted enrollment for the new high school will begin to DECLINE in 2027. Sherwood has enough vacant land to accommodate new housing and jobs for years to come, when planned and developed wisely.

The types of industry that are planned are land-extensive, taking up farmland despite the drastic decline in farmland in the county and natural resource land despite the fact that only 15% of original significant natural resources remain in the county. It is a red herring to state that the goal is to increase the number of residents who work in the city - that correlation is not necessary for a functioning city, especially one in Metro where many people work in one city and live in another. If the city lacks jobs, it may be of its own making because it recently approved many expensive homes. It should not be rewarded for poor planning. And the type and extent of industry proposed is expensive to provide with infrastructure and services, yet there is no Taxpayer Impact Statement on the costs.

Farmland First stands with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,
Nellie McAdams
Farmland First

Miriam Hanes

From: Brian Fields [redacted]
Sent: Wednesday, July 24, 2024 3:46 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]Comments from Brian Fields on Sherwood West expansion proposal
Attachments: Brian Fields Sherwood UGB expansion Metro 24Jun2024 comments.pdf

CAUTION: This email originated from an External source. Do not open links or attachments unless you know the content is safe.

I would appreciate it if my attached comments are provided with the July 24 MPAC meeting packet.

Thank you,
Brian Fields
Secretary,
Eastview Road Neighborhood Association

Sherwood UGB expansion comments,
Brian Fields
Secretary, Eastview Road Neighborhood Association

I urge the Metro Council to scale back the Sherwood West Urban Growth expansion. We do not have the transportation infrastructure to support this growth. In addition, the City of Sherwood has not done any planning, not even "conceptual", to expand the capacity of Elwert Road, the only viable north south connector.

The current plans for Elwert Road are inadequate for the future growth planned.

Elwert road is serving as a regional connector. Even without bringing in additional land in the Sherwood West Urban Reserve we can expect the traffic flow to increase. With the addition of large amounts of new housing the burden on the existing road will only increase. How has Sherwood planned for increased capacity? They have not.

The Sherwood West concept plan shows the vision that Elwert road remain one lane in either direction with the addition of turn lanes. The city has repeatedly said that their vision of Elwert is that of a neighborhood street. This flies in the face of the current reality of an already overburdened regional connector, let alone showing any sense of planning for the future to accommodate a greatly increased local population. The only mention in the Sherwood West concept plan of planning for future connectivity is vague mentions of conceptional connectors. You can reference the "Transportation and Infrastructure" Section on page 101 of part 1 of the Sherwood UGB expansion proposal.

"North-South Connectivity – The concept of adding a route to enhance regional north-south connectivity will require future study. Additional feasibility and cost analysis will be

necessary. This should be considered as a long-term strategy, rather than an essential component of early stage transportation planning in Sherwood West."

But the truth is that the Sherwood West topography is not going to allow any new north south connectors. During the public outreach portion of the Sherwood West concept plan much feedback was provided to the city outlining specific complications for a north south connector west of Elwert Road. The City's own traffic modelling demonstrated that regional traffic could not be diverted from Elwert Road to any significant degree. The land is riddled with steep slopes and is bisected by Chicken Creek. In addition, the border of Sherwood West veers sharply east when you go north of Edy Road. If this hypothetical connector were built, as it moved north it would run into Rural Reserve land. Due to this a connection to Scholl's Sherwood Road to the north could not be completed. This means any road that was built would have to feed back onto Edy and Elwert, the existing transportation corridor.

There really is no choice but to improve the existing transportation corridor, but the City of Sherwood's West Concept plan does the opposite. Sherwood is proposing to move portions Elwert Road off it's current north south alignment and meander to the west, pass through two round-abouts, incur a new Chicken Creek crossing and then meander back to the Elwert Road current alignment in the north.

We have examples in the nearby region of what successful road planning would look like. The massive development to the north of Sherwood West, on Roy Rogers Road, has been accompanied by expansion of that road to 4 lanes. If you want to see aesthetically pleasing road expansion, we need only look to the improvements Lake Oswego has done on Boones Ferry Road. The road was both

improved to 4 lanes with a turn lane, but also includes attractive landscaped dividers and sidewalks. This is much like Sherwood has proposed, but with a critical difference, Lake Oswego recognized the need to increase capacity while making attractiveness an important part of their road design. Both can be done.

To be clear my point is not that Sherwood has not already solved the capacity problem prior to asking for an Urban Growth Boundary expansion. The problem is that Sherwood is not even planning for increased capacity. In fact, their public statements during the West Concept Plan outreach process indicated they want to discourage regional traffic and keep Elwert as a neighborhood street. See the description on page 227 of the submittal, in the Section title "SW Elwert Road Design Concept". Make note that the designation for much of Elwert Road is "Residential Boulevard". The is much risk if Sherwood doubles down on this approach that near term development will forestall any future capacity improvements on Elwert Road.

Their proposal to bring in the entire Sherwood West Urban reserve should be scaled way back until the City actual provides realistic transportation planning. Bringing the entire 1200 acres of Sherwood West now into the UGB is only going to compound a local a regional transportation quagmire which already exists. Sherwood needs to confront the reality that topography and the Urban Reserve boundaries themselves prevent any alternate north south connector. I encourage Meto to not approve Sherwood's ask to bring in the entire Sherwood West Urban Growth Reserve into the Urban Growth boundary.

Brian Fields
Resident of Sherwood West

MULTIFAMILY NW
The Association Promoting Quality Rental Housing

Multifamily NW
[redacted]
Tigard, OR 97224

Metro Council
600 NE Grand Ave
Portland, OR 97232

August 20, 2024

Dear Metro Council Members,

As the largest association of housing providers in Oregon, Multifamily NW is dedicated to ensuring that our communities thrive through sustainable growth and adequate housing supply. We are writing to express our strong support for the adoption of a high-growth forecast projection as you evaluate the urban growth strategy for the Portland Metro area. As you know, our region is currently navigating the consequences of a severe housing crisis, and it is imperative that we take bold, forward-thinking action to address the urgent need for housing.

Undersupply is the Root Cause of Housing Crisis

The Portland Metro area is experiencing an unprecedented demand for housing, which far exceeds the available supply. According to an alarming report by ECONorthwest, our region is already facing a housing shortage of more than 59,000 homes, with an additional need for 10,683 homes to accommodate our growing houseless population. Moreover, it projects that the region will require the construction of 294,853 new housing units over the next 20 years. These figures significantly surpass Metro's current estimates of 143,300 to 203,200 new units.

The numbers provided by ECONorthwest paint a stark picture of the housing crisis we are facing. By adopting a high-growth forecast projection, Metro can more accurately prepare for the higher-than-baseline growth that our region will (hopefully) experience. This proactive approach will enable us to meet the housing needs of our rapidly growing population, while also mitigating the affordability challenges that threaten the livability of our communities. And, if population growth does not proceed as expected, the land will not be impacted.

EXECUTIVE DIRECTOR
Gary Fisher
[redacted]

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Furthermore, residents in the Portland Metro area are facing increasing barriers to home ownership due to the affordability consequences that our undersupply has caused. If the council adopts and implements the high-growth forecast projection, home ownership will be more attainable for communities across the region.

Portland Metro Should Welcome Responsible Development

Additionally, Metro Council should shape a new policy that recognizes the low capacity for housing development inside UGB lands and the extreme need for new housing. The current estimates indicate a surplus of +9,050 units, which we believe is unrealistic given the actual deficit of -84,000 units needed inside the UGB.

Attempting to control where and how the market will adapt can have unintended consequences. Metro should avoid imposing restrictive policies that risk pushing housing developers to other U.S. markets with fewer regulatory barriers. Instead, we should focus on creating an environment that encourages development and investment in the Portland Metro area, ensuring that we remain competitive and capable of meeting our region's housing demands.

A crucial component of addressing our housing crisis is expanding the Urban Growth Boundary (UGB). By expanding the UGB, we can increase the availability of land for development, thereby helping to slow the escalating costs of housing. As we have all seen firsthand, the limited supply of land within the current UGB constrains development and drives up prices, making it increasingly difficult for residents to find affordable housing.

Expanding the UGB will not only create more opportunities for housing development but will also encourage competition, which can help slow the increase in housing costs and make living in the Portland Metro area more affordable. It is essential that we take this step to ensure that all residents have access to housing that meets their needs and budgets.

Acknowledgment of Employment Lands Considerations

While our primary focus is not directly within the commercial and industrial development sectors, we acknowledge that the availability and management of employment lands significantly impact the overall growth and sustainability of our communities. In this regard, we recommend that the Metro Council consider discounting the approximately 1,300 acres of land with slopes exceeding the 7% grade threshold, which is generally identified as the industry standard for commercial and industrial development. We have an obligation to ensure the land classified as viable truly meets the practical requirements for development.

By integrating these considerations, we believe that the Metro Council can better strategize the use of employment lands to foster balanced development, support economic vitality, and contribute positively to the community's housing and employment needs.

City of Sherwood Proposal Deserves Approval

Furthermore, Multifamily NW fully supports the City of Sherwood’s proposal for expansion without any conditions. Sherwood has demonstrated a commitment to responsible growth through a rigorous public engagement process, and we trust in their ability to understand and address their community's needs. Metro should respect the decisions made by local communities and support their efforts to grow in a way that aligns with their unique vision and values.

It is crucial to trust Sherwood's expertise and ongoing community engagement process. They are best positioned to determine how to grow reasonably and responsibly, ensuring that their expansion aligns with local needs and aspirations.

Conclusion

In conclusion, Multifamily NW strongly advocates for the adoption of a high-growth forecast projection as part of the urban growth strategy for the Portland Metro area. By acknowledging the true extent of the housing crisis, rejecting restrictive development scenarios, expanding the urban growth boundary, and supporting local initiatives, we can pave the way for a more prosperous, affordable, and sustainable future for our communities.

We appreciate the Metro Council's dedication to addressing these pressing issues, and we are confident that, together, we can create a housing strategy that meets the needs of our growing region. Thank you for considering our perspective and recommendations.

Sincerely,

Gary Fisher
Executive Director
Multifamily NW

Miriam Hanes

From: Zach Lindahl <[redacted]>
Sent: Tuesday, August 20, 2024 9:11 AM
To: Metro 2040
Subject: [External sender]Multifamily NW Public Comment on UGR
Attachments: MFNW Metro UGR Comments.pdf

CAUTION: This email originated from an **External source.** Do not open links or attachments unless you know the content is safe.

Good Morning,

My name is Zach Lindahl, and I am the Director of Government Affairs for Multifamily NW. Our association is the largest coalition of housing providers in the state of Oregon, representing more than 275,000 units. In addition to frequent compliance training and hundreds of networking opportunities, our association advocates for common sense housing policy at all levels of government on behalf of our members. Our top priority is to keep Oregonians housed. In a time of housing crisis across the state, it is important that we consider how all policy affects both housing supply and affordability for renters.

Attached are comments Multifamily NW submitted regarding the recent Urban Growth Report. I thought I would share via this email address as well. Please let me know if you have any questions regarding our comments.

Best,

Zach Lindahl
Director of Government Affairs
Multifamily NW
[redacted]



Peter Foster

[redacted]

Sherwood, Oregon, 97140

[redacted]

8.22.2024

Metro Council

600 NE Grand Ave

Portland, OR 97232

Dear Metro Council Members,

I am writing to advocate for the inclusion of all land currently designated in the Sherwood West Growth Plan as proposed by the City, to ensure the future success of the City and the greater Community. The Sherwood West Plan is a good plan and the City's "control of the narrative" will be lost if the Plan is piecemealed in phases. We have strong interest in growth that will support diverse ranges of people who wish to live and work in our community. Sustainable growth, as championed by conservationists like myself, offers far more advantages to our community than no growth at all. History has shown us that the key to a prosperous society is not in stagnation, but in the careful and responsible use of our resources to meet the needs of the many and not just the few.

Our Project, Prodigal Sons, consists of a 'single farm restaurant' that will feed people locally, provide jobs and unique living opportunities, unlike grass seed and single crop export farmers. We have been diligently working with the City of Sherwood and the High school Ag and Culinary programs with intent to provide career opportunities and real-world skill development to the students. There are two types of landowners in our area. The first type are focused on growth opportunities and plan comprehension. The second type champion land preservation now that they built their homes where forest and farms used to be and dislike the middle and lower income folks in general.

Recently we have heard disturbing news that there is opposition to growth from several organized groups. As fact, the massive commercial farms with the most capital are not friends of Oregon's environment and financial future...

Organizations like Thousand Friends of Oregon, while well-intentioned in their efforts to preserve natural spaces, often fail to recognize the real-world impact of their policies on ordinary Oregonians. Their stance is reminiscent of Henry Thoreau's philosophy of naturalism—a perspective that prioritizes untouched wilderness over the needs of people, especially those of middle and lower incomes. Unfortunately, this approach is detrimental to the economy, creating a situation where "the few with the most" exert influence to protect their estate views at the expense of working and poor families who need affordable housing and job opportunities. If Metro is convinced not to act due to well organized and well-funded opposition groups representing s small percentage of the population, there will be no meaningful growth in Sherwood for many years to come and the fallout will be your (Metro's) failure because of wealthy numby influence.

Sherwood is a growing community with real needs. Leaving developable and well-planned land undeveloped in the name of preservation benefits a select few, but it does nothing to help the people of Sherwood diversify and thrive. Instead, we need to focus on sustainable development that balances environmental responsibility with economic growth. Responsible housing, jobs and infrastructure supports our town by allowing future generations to thrive in the area. At present, our next generation can't afford to live here and don't have enough local jobs here.

I urge Metro to consider the long-term benefits of sustainable growth over the short-term appeal of leaving land wild. Just as Roosevelt and Pinchot understood the value of managing natural resources for the benefit of all, we must adopt policies that ensure the land serves the people of Sherwood—not just those who can afford to prioritize untouched nature over community needs. The Sherwood West concept plan addresses that in a most impressive way.

Additionally, if City Council is given unfavorable conditions that stalemates the entire ask of the Urban Growth Management Decision, they could potentially withdraw and fail to have served

our community. Most will likely not be in service many years from now anyway. The application process is too costly. We would have to start the process all over again. By the time interest returns, if at all, and sites are permitted and built it will have been 8 years. Hopefully this letter gets into the right hands and Sherwood will maintain trajectory towards becoming one of Oregon's most desired places to live, for all, not just the few.

I look forward to your consideration of this critical issue and am confident that with timely and fair stewardship, we can create a future where Sherwood thrives economically, socially, and environmentally.

Thank you for your time and attention.

Sincerely,

Peter C. Foster

Owner
Memoirs LLC
[redacted]
Honolulu, HI. 96813
memoirshawaii.com

Managing Partner
Prodigal Sons LLC
[redacted]
Sherwood, OR. 97140
prodigalsons.farm

[redacted]
[redacted]

Miriam Hanes

From: Peter Foster <[redacted]>
Sent: Friday, August 23, 2024 11:32 AM
To: Metro 2040
Subject: [External sender]Urgent. Please Read
Attachments: Final Letter to Metro.pdf

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Peter Foster

19800 SW Kruger Road

Sherwood, Oregon, 97140

[redacted]

8.22.2024

Metro Council

600 NE Grand Ave

Portland, OR 97232

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Thank you for your time and attention.

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Managing Partner
Prodigal Sons LLC
[redacted]
Sherwood, OR. 97140
prodigalsons.farm

[redacted]
[redacted]

CLACKAMAS COUNTY

PLANNING & ZONING

DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT

DEVELOPMENT SERVICES BUILDING
[redacted]
OREGON CITY, OR 97045

TO: Metro Urban Growth Management Team, via email [redacted]

FROM: Clackamas County Planning Staff

RE: Technical Letter of Comment Regarding the Draft 2024 Urban Growth Report

DATE: August 22, 2024

Thank you for the opportunity to comment on the Draft 2024 Urban Growth Report (UGR). We appreciate your efforts to coordinate with our team and the many conversations you have convened in developing this report.

In addition to the Clackamas County Board's letter of comment, our technical staff would like to submit to the record the below concerns, questions and requests.

First, as raised at MTAC, it is difficult to determine how the calculations were made between the appendices and the draft UGR. We request that you provide a clearer record of computation in calculating the formal figures that are the basis for tables in the UGR.

For example, Table 9, *Summary of residential growth capacity inside the UGB by housing type* (page 32) shows "low", "mid", and "high" capacity numbers for single-unit detached, middle housing, and multifamily housing types. But the note to the table says that these capacity numbers should not be totaled, "for instance, adding up high capacity for each housing type", so it is unclear how we know how much capacity exists in the UGB and how these numbers should be used to compare capacity to the projected need. While Metro staff has provided, via email, some clarity to how the numbers in this table were calculated, it remains unclear how this table relates to Table 15 (page 40) in which the expected need is compared to some amount of capacity in each of the scenarios. To that end, additional data in an appendix that clearly walks a reader through these calculations should be provided; this would not only be helpful for reviewers, but it would also lead to more confidence in the summaries and options presented in the UGR.

Buildable Lands Inventory:

- Our team would like to thank Metro Staff and Johnson Economics for the creation of the Predictive Redevelopment Model to create a supply side response to key market parameters for anticipated development and redevelopment activity (Appendix 2, Attachment A). This is an innovative resource that is working to provide one of the missing pieces of the puzzle in matching land use with the redevelopment aspects of buildable land. That said, we do have some questions about the assumptions for redevelopment. One concern is that the proforma indicates that much of our "naturally occurring" affordable housing, such as manufactured home parks and older existing apartments will be re-developed. We are concerned that some of the assumptions may not support the retention of these critical assets, thereby leading to displacement, and also may incorrectly influence the capacity estimates.

Housing Needs Analysis:

- Data on housing underproduction show inconsistencies. In 2021, ECO Northwest conducted a study, Implementing a Regional Housing Needs Analysis Methodology in Oregon that estimated housing underproduction in the Portland Metro region to be 59,488 units (Exhibit 18, p. 35). In the draft UGR, however, the estimate for housing underproduction is estimated to be 15,000 (Table 10, p. 33). Metro Staff provide a thorough methodology for calculating underproduction (Appendix 8A, p. 4), but the UGR and accompanying appendices do not provide an explanation for this discrepancy. Further, it would be helpful to have a record of specific inputs and calculations that result in the figures listed in Table 10 on p. 33 in the UGR.
- There is detailed information about the total new housing units needed in the Metro UGB by housing type (Table 14, p. 37) but there is no equity analysis in the UGR or Appendices 8 or 8A that provide a clear understanding of who the proposed housing units in Sherwood West are going to serve or how these new housing units will be used to accommodate those working in the hospitality sector of the proposed expansion area.
- Slope requirements may not equate to affordable housing. Site design and assembly adds considerable cost and discourages a site's likelihood for affordability when entering the market after construction. Further scrutiny and discussion on housing mix, particularly aspects of its affordability, should be determined and clarified in the final UGR.

Employment Land:

- Provide a clearer understanding of how slope requirements affect buildable land inventory. If slope requirements are at 7%, that would decrease buildable industrial land from 6,000 acres to 4,700 acres inside the UGB, on aggregate. If we are planning for high growth, this would change a 750-acre aggregate surplus into a 550-acre aggregate deficit (Table 19; p. 54 of draft UGR).
- Discussion on transportation and transit investment is almost completely missing in the report and accompanying Appendices; this must be developed and included in the UGR. Currently, there are no transit options in the proposed expansion area, and the closest bus in service is 2 miles away from Sherwood West. Addressing infrastructure needs and investment is critical for growth in the region.
- There may be a mismatch in what is presented in the Buildable Land Inventory (Figure 23; p. 55; Appendix 6) and what is desired when considering market factors. The current analysis presents Tier 3 land that is a minimum of 30 months from being development ready. Also noted in the UGR is that the average industrial parcel size is 3.8 acres, with a median industrial parcel size of 1.7 acres. Market factors indicate firms seek parcels that are a minimum of 5 acres and Tier 2 readiness (developable in 7 to 30 months or less). It would be useful for the analysis to break down data even further, describing the amount of land that is at least 5 acres and at least Tier 2 in readiness.

Capacity Analysis:

- Capacity allocated to unincorporated Clackamas County includes several areas that will not urbanize and develop at expected densities unless annexed into a city. Based on conversation with Metro staff, we understand that urban levels of capacity that are within the City of Happy Valley's North Carver/Pleasant Valley Plan area and planned areas outside of Oregon City are

included in the unincorporated county totals if the lands have not yet annexed to the respective cities. While staff also understands that this capacity is included as part of regional capacity for the purposes of assessing the regional urban growth boundary, we have several concerns about including this capacity in the unincorporated totals versus the cities where this urban development would happen.

a. County staff raised this issue several times throughout the development of the draft UGR and was assured that it would be addressed or at least acknowledged. Based on out reading of the draft UGR and associated appendices, it is neither addressed nor acknowledged.

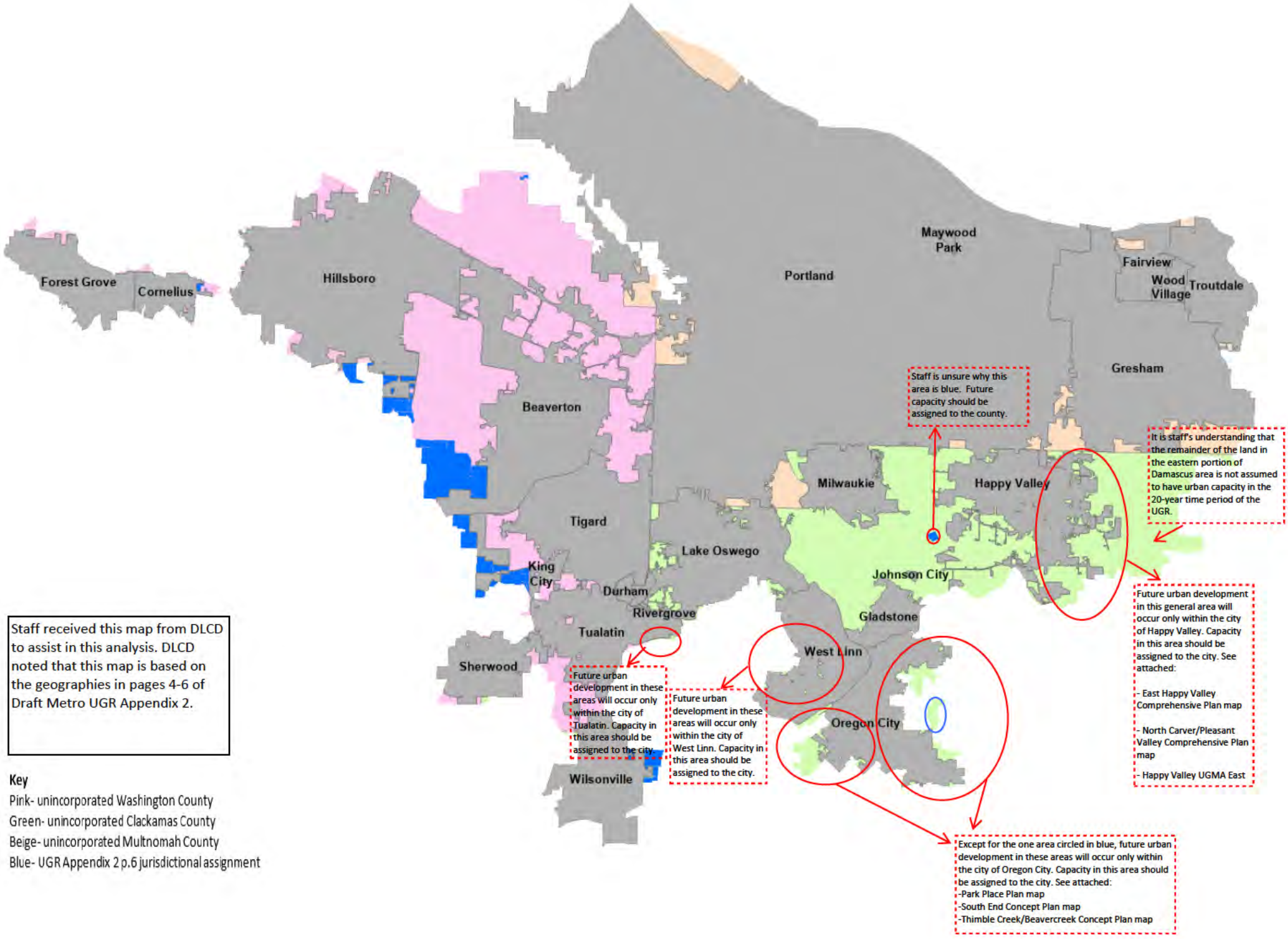
b. The urban unincorporated land (UUL) within the Metro UGB will be allocated housing targets under the new Oregon Housing Needs Analysis (OHNA) rules. Specifically, it appears from initial drafts of the OHNA methodology for allocating housing production targets, that the state will by relying on Metro's capacity analyses and ultimately Metro's distributed forecast for these housing production allocations. It is county staff's understanding that Metro's distributed forecast is at least partially based on these capacity numbers. Therefore, it is imperative that the capacity is "assigned" to the correct jurisdiction.

c. To that end, county staff has attached several maps to this letter to help Metro identify where future capacity numbers should be assigned and is happy to work with Metro staff to resolve this issue.

- The capacity analysis also overestimates capacity allocated to residential development and underestimates capacity for commercial development in some areas identified as having "mixed use", which county staff understands to mean zoning that would allow for both residential and commercial development. Specifically, in areas along McLoughlin Blvd in Clackamas County – in which the general commercial zoning also allows fairly high-density housing - it is assumed development of buildable lands will be 95% residential and 5% commercial. Little to no residential development has occurred in this location in the last several decades despite housing being allowed by zoning.

We acknowledge that completing these analyses for the region are challenging, especially in this time of constant change in housing and employment markets and new rules coming down from the state. We appreciate Metro's efforts to create an analysis that is more nuanced and market-based, rather than the simpler demand versus supply numbers that have been used in past reports, and we recognize that this approach leads to more uncertainty.

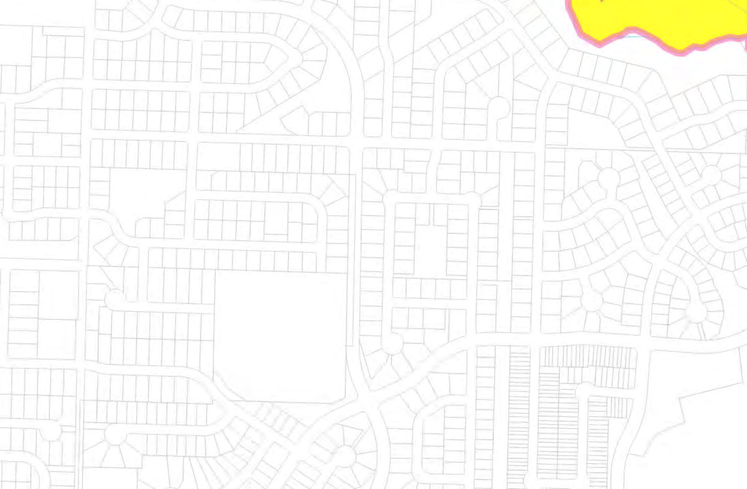
With that in mind, we would like to reiterate our Board's request to consider selecting the high growth rates for both population and employment, which will provide jurisdictions the latitude to attract more investment opportunities, meet coming housing production targets, and better be able to balance housing, employment and transportation needs.


Forest Grove
Cornelius
Hillsboro
Beaverton
Tigard
King City
Durham
Rivergrove
Tualatin
Sherwood
Wilsonville
Lake Oswego
Portland
Maywood Park
Milwaukie
Happy Valley
Johnson City
Gladstone
West Linn
Oregon City
Gresham
Fairview
Wood Village
Troutdale
Staff is unsure why this area is blue. Future capacity should be assigned to the county.
It is staff's understanding that the remainder of the land in the eastern portion of Damascus area is not assumed to have urban capacity in the 20-year time period of the UGR.
Future urban development in this general area will occur only within the city of Happy Valley. Capacity in this area should be assigned to the city. See attached:
- East Happy Valley Comprehensive Plan map
- North Carver/Pleasant Valley Comprehensive Plan map
- Happy Valley UGMA East
Future urban development in these areas will occur only within the city of Tualatin. Capacity in this area should be assigned to the city.
Future urban development in these areas will occur only within the city of West Linn. Capacity in this area should be assigned to the city.
Except for the one area circled in blue, future urban development in these areas will occur only within the city of Oregon City. Capacity in this area should be assigned to the city. See attached:
-Park Place Plan map
-South End Concept Plan map
-Thimble Creek/Beavercreek Concept Plan map
Staff received this map from DLCD to assist in this analysis. DLCD noted that this map is based on the geographies in pages 4-6 of Draft Metro UGR Appendix 2.
Key
Pink- unincorporated Washington County
Green- unincorporated Clackamas County
Beige- unincorporated Multnomah County
Blue- UGR Appendix 2 p.6 jurisdictional assignment

CLATSOP ST
CLATSOP
162ND AVE
172ND
SAGER RD
HEMRICH RD
162ND AVE
172ND AVE
SCOUTERS MOUNTAIN RD
HAGEN RD
MONNER RD
PLEASENT VALLEY PKWY
162ND AVE
MISTY DR
169TH AVE
VOGEL RD
SUNNYSIDE RD
SUNNYSIDE
TROGE RD
CROSSROADS AVE
ROCK CREEK BLVD
162ND AVE
172ND AVE
HWY 212
HWY 212
HWY 212

R-20
R-10
R-15
IPU
R-7
R-5
MUR-M2
SFA
EC
MUR-S
MCC
CCC
MUR-A
MUR-M1
IC
MUE
R5
R7

LOCATION



HAPPY VALLEY, OR
EST. 1965

East Happy Valley Comprehensive Plan

Existing Roads

- Arterial
- Collector

Planned Roads

- Arterial
- Collector

Zoning

- Community Commercial Center (CCC)
- RRFF5
- Employment Center (EC)
- Industrial Campus (IC)
- Institutional and Public Use (IPU)
- Mixed Commercial Center (MCC)
- Mixed Use Employment (MUE)
- Mixed Use Residential - Attached (MUR-A)
- MUR-M1 (Mixed Use Residential MultiFamily)
- MUR-M2 (Mixed Use Residential Multifamily)
- MUR-S (Mixed Use Residential Single Family)
- R-5 (Residential 1 Unit/5,000 SF. Ft.)
- R-7 (Residential 1 Unit/7,000 Sq.Ft.)
- R-10 (Residential 1 Unit/10,000 Sq.Ft.)
- R-15 (Residential 1 Unit/15,000 Sq.Ft)
- R-20 (Residential 1 Unit/20,000 Sq.Ft.)
- R-20 (Residential 1 Unit/20,000 Sq.Ft.)
- Single-Family Attached Residential (SFA)
- Comprehensive Plan Boundary

0 0.07 0.15 0.3 Miles

Date Saved: 9/28/2022

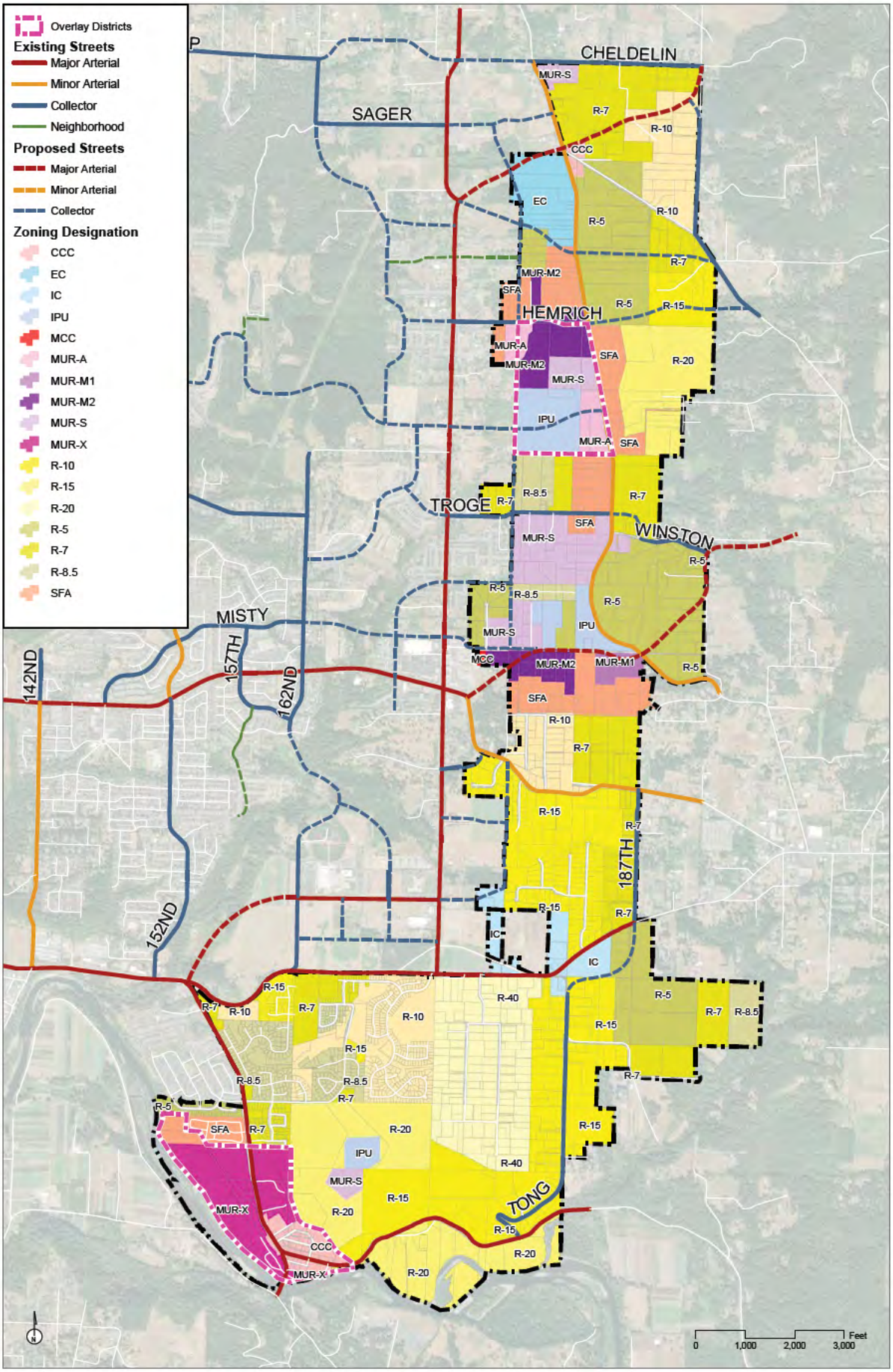
Source: Data from Clackamas County GIS & Metro Data (2021)

The information on this map was derived from digital databases from the City of Happy Valley. Care was taken in the creation of this map but it is provided "as is". The City of Happy Valley cannot accept any responsibility for any errors, omissions, or positional accuracy, and therefore, there are no warranties which accompany this product. Although information from Land Surveys may have been used in the creation of this product, in no way does this product represent or constitute a Land Survey. Users are cautioned to field verify information on this product before making any decisions.

This document has been reproduced from the East Happy Valley Comprehensive Plan Map updated February 7, 2009.

City of Happy Valley G:\Maps\Maps For Planning\2022 Planning maps\Long Range maps\EHVCP September 2022\EHVCP September 2022.aprx

Figure 23. Zoning Map



DocuSign Envelope ID. 0D422339-34FF-4403-B293-E391A7AFA253

CITY OF HAPPY VALLEY/CLACKAMAS COUNTY

URBAN GROWTH MANAGEMENT AGREEMENT

This Urban Growth Management Agreement ("UGMA" or "Agreement"), by and between the City of Happy Valley, an Oregon municipal corporation ("City") and Clackamas County, a political subdivision of the State of Oregon ("County") (collectively, the "Parties," and each individually a "Party").

RECITALS

WHEREAS, authority is conferred upon local government under ORS 190.010 to enter into an agreement for the performance of functions and activities that the local government, its officers or agencies has authority to perform; and

WHEREAS, the City and the County have a common interest in coordinated comprehensive plans, compatible land uses and coordinated planning of urban facilities within the Happy Valley Urban Planning Area East ("HVUPAE"), as described in Exhibit A to this Agreement; and

WHEREAS, the exchange of information should concentrate on issues that may have a significant impact on either Party and should not entail cumbersome procedural requirements that may increase the time necessary to expedite decision making; and

WHEREAS, OAR 660-003-0010 requires management plans for unincorporated areas within an urban growth boundary to be set forth in a statement submitted to the Land Conservation and Development Commission ("LCDC") at the time of acknowledgement request; and

WHEREAS, OAR 660-011-0015 requires an urban growth management agreement to specify the entity responsible for the preparation, adoption and amendment of the public facility plan(s); and

WHEREAS, the City and County previously entered into an urban growth management agreement on January 30, 1992, and amended on June 19, 2001, and subsequently amended on November 18, 2013 for areas to the west and southwest of the existing City of Happy Valley (extending to the Veterans Memorial Highway), which is hereby referred to as the "UGMA WEST" and is a separate urban growth management agreement from this Agreement, which is hereby referred to as the "UGMA EAST".

Clackamas County Official Records
Sherry Hall, County Clerk
Commissioners' Journals
Agreements & Contracts

2021-0580

12/02/2021 2:06:29 PM

DocuSign Envelope ID. 0D422339-34FF-4403-B293-E391A7AFA253

NOW THEREFORE, the Parties agree as follows:

AGREEMENT

1. Definitions.

As used in this Agreement, the following words shall mean or include:

1.1 Comprehensive Plan. Any plan document as described in ORS 197.015(5) that is adopted by a Party and that applies within the HVUPAE.

1.1.1 City Comprehensive Plan. The City of Happy Valley Comprehensive Plan.

1.1.2 County Comprehensive Plan. The Clackamas County Comprehensive Plan.

1.2 Land Use Policies. The whole or any part of any comprehensive plan, subarea comprehensive plan, Title 16 of the City's Municipal Code ("Development Code"), the Clackamas County Zoning and Development Ordinance ("ZDO"), refinement plan, public facility plan developed under OAR Chapter 660, Division I, land use regulation as defined by ORS 197.015(11), or any other generally applicable policy regulating the use or development of land. As applied to Metro, "Land Use Policies" include Planning Goals and Objectives, Regional Urban Growth Goals and Objectives, Functional Plans, and Regional Framework Plans.

1.3 Happy Valley Urban Planning Area East ("HVUPAE"). The HVUPAE includes unincorporated land within the Portland Metropolitan Urban Growth Boundary ("UGB") located generally east of 172nd Avenue and west of 222nd Avenue, as illustrated on the map attached as Exhibit A to this Agreement.

2. Terms of this Agreement.

2.1 This UGMA EAST becomes effective as specified under Section 8.3, below, and shall continue thereafter for an initial term of 10 years, unless terminated as provided in this Section or modified consistent with Section 8.4. This Agreement automatically renews for one additional 10-year term unless, not later than 90 days prior to the expiration of the initial term of this UGMA, one of the Parties provides the other Party with written notice that it does not wish to renew the UGMA EAST, in which case this UGMA will automatically terminate upon completion of the initial 10-year term. Either Party may terminate this agreement at any time after providing at least 90 days written notice to the other Party.

3. General Provisions.

3.1 General Planning and Permitting Responsibilities

3.1.1 Comprehensive Plan/Zoning Designations and Amendments. The County Comprehensive Plan and zoning shall apply to all unincorporated land within the HVUPAE until such time as those lands are annexed into the City. Unless

otherwise provided by law, the development of a comprehensive plan map amendment or zone change for the unincorporated areas within the HVUPAE shall be a coordinated joint effort of the Parties. The County shall be responsible for preparing and making a decision on all legislative and quasi-judicial comprehensive plan amendments/zone changes for areas within the HVUPAE not annexed to the City in coordination with the City and consistent with state law and the Metro Functional Plan. The City shall have the unrestricted right to review, comment on and appeal all legislative and quasi-judicial comprehensive plan amendments/zone changes processed by the County within the HVUPAE.

3.1.2

Land Use Permitting Authority. The County Comprehensive Plan and land use regulations shall apply to an application for a permit or other land use review within the HVUPAE not annexed to the City. County shall retain responsibility and authority for all implementing regulations and land use actions for all unincorporated lands within the HVUPAE, until lands are annexed to the City.

For properties that annex into the City of Happy Valley in the HVUPAE, the City shall apply the underlying County Plan and zone provisions in accordance with the procedural framework of the City's Municipal Code until the City has adopted urban City Comprehensive Plan designations and zoning districts for the HVUPAE.

3.1.3

Urban Plan Development. The Parties agree that the City shall be responsible for developing and adopting an urban Comprehensive Plan and zoning districts for areas that do not currently have urban designations within the HVUPAE, per Section 4 of this Agreement.

3.1.4 Land Divisions. Land divisions that would create parcels smaller than 20 acres in size shall not occur within lands with a Rural Comprehensive Plan designation within the HVUPAE.

3.2 Annexation.

3.2.1 Conditions Requiring Annexation. The owner(s) of property adjacent to the City (including by extension of a public right-of-way or body of water, per the City's annexation policies), who are seeking access to City-provided services (for example, Planning, Engineering, or Building Division permits) may be required to submit an annexation petition to the City.

3.2.2 Annexation Consent. At the discretion of the Board of County Commissioners ("Board"), the County may provide consent for annexations, when such consent is required per ORS 222.170 or ORS 222.125 for properties utilizing county right-of-way for an annexation, if city agrees to accept the transfer of the section of the roadway being used to access the annexed property.

3.2.3 Annexation Plan. Any City-initiated Annexation Plan shall be developed consistent with applicable state and regional laws. Opportunity shall be provided

to citizens, the County, active Citizen Planning Organizations ("CPOs") and affected service providers to review and comment on the Annexation Plan prior to any annexation election. Annexation Plan(s) will include development of public facilities plan(s) for the Annexation Plan area(s).

3.3 Public Facilities.

3.3.1 Public Facilities Plans. Except as identified in Section 4, the City shall coordinate the preparation or amendment of public facilities plans within the HVUPAE as may be required by OAR Chapter 660, Division 11 (Public Facilities Planning) and applicable sections of ORS Chapter 195 with the appropriate service providers. Upon annexation, an area within the HVUPAE shall be provided with public facilities services through a combination of City-provided services and by way of Intergovernmental Agreements ("IGAs") with applicable service providers, which may include the following: sanitary storm services – Water Environment Services "WES"); water service providers – Sunrise Water Authority, Clackamas River Water; county road services – Clackamas County Department of Transportation and Development; fire prevention services – Clackamas Fire District No. 1; services related to the provision and maintenance of open space – Metro; mass transit services – Tri-Met; and, school facility planning – North Clackamas School District No. 12, Gresham-Barlow School District, and Centennial School District.

3.3.2 New Service Districts. County shall not form any new county service districts to serve any areas within the HVUPAE, nor shall it support the annexation of any land within the HVUPAE to any such districts or to any other service districts without the prior written consent of the City.

4. Planning for Urbanization of Rural Lands in the HVUPAE.

4.1 Planning authority. The City shall be responsible for planning for any future urbanization of rural lands within the HVUPAE. The urbanization of rural lands within the HVUPAE will only occur upon annexation to the City. The City shall coordinate with the County Planning Division and other relevant County Department of Transportation and Development ("DTD") staff regarding future urban planning and development activities and the transportation network in the HVUPAE. County staff shall be invited to participate in the proceedings of all relevant Technical Advisory Committees in the review of urban plans within the HVUPAE. The City shall notify and coordinate with the County on amendments to the City's Transportation System Plan ("City TSP").

4.2 Land use and transportation planning in the HVUPAE. Building off existing studies and previously completed planning work, the City of Happy Valley and the County will develop the following planning documents for the HVUPAE:

4.2.1 Integrated Land Use and Transportation Plans (Urban Plans):
The City may create detailed, integrated land use and transportation plans for "phases," or portions of the HVUPAE that the City determines are of sufficient size to phase development and urban service provision in a cost-effective and efficient manner. These plans shall include all elements required for a full urban

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comprehensive plan for the selected area.

4.2.1.1 Coordination: All integrated land use and transportation plans shall be coordinated with the County to ensure consistency with County transportation plans and other planning in adjacent unincorporated rural areas. The City shall lead this planning undertaking with County coordination and participation in all relevant committees.

4.2.1.2 Notification: The City shall notify the County Planning Director prior to the initiation of each phase of urban land use and transportation planning. Notification shall, at a minimum, include a map of the area to be planned and an estimated timeframe for adoption of an urban plan.

4.2.1.3 Providing Employment Land: The City and County recognize the importance or providing employment land to support stronger economic growth in the County and will work together to identify opportunities to provide such lands in the HVUPAE, to potentially include employment areas different than those identified as Metro Title 4 lands.

4.2.1.4 Providing Affordable Housing Opportunities: The City and County recognize the importance or providing land for the development of affordable housing in the County and will work together to identify opportunities to provide such lands in the HVUPAE.

4.2.2 Clackamas County Transportation System Plan ("County TSP"): An update of the County TSP will be developed for the Metro UGB area illustrated within Exhibit A beyond (east of) any areas inside the HVUPAE that are not part of an integrated land use and transportation plan that is adopted or actively being completed by the City. The County TSP update will plan for transportation improvements necessary to serve travel patterns that are expected in the future in and adjacent to the HVUPAE including, without limitation, those areas within the Metro UGB but outside the HVUPAE.

4.3 State Highway System Improvements. The City and County recognize the importance of working with the Oregon Department of Transportation ("ODOT") to ensure that state transportation facilities be built/improved to accommodate expected population and employment growth in the HVUPAE and will utilize any subsequent land use and transportation plans to advocate for the timely development of the Sunrise Highway.

5. Other City Responsibilities.

5.1 Functions. All functions relating to the subject matter of this Agreement not specifically listed in this Section or any Exhibit as being the responsibility of the City will remain the responsibility of County. City shall be responsible for the timely and effective distribution to County of studies, information, requests, data and personal communications in City's possession on any matter concerning coordination between the City and County and/or regarding any infrastructure or policy issues coordinated by County.

5.2 Road Jurisdiction, Transfer and Condition. The City shall assume jurisdiction of the full width of any applicable segment of County road classified by the County as minor arterial, collector, connector, or local street that is within or immediately abutting an area annexed to the City within one year of the date of that annexation, assuming all provisions detailed below have been met. The transfer and assumption of jurisdiction shall be consistent with the provisions of ORS 373.270.

Concurrent with the date that a road is transferred, the County will upgrade the roadway or provide funds equivalent to the cost of a two-inch overlay over the existing pavement area, unless the road has a Pavement Condition Index (PCI) rating of 70 or higher, or the Parties mutually agree that overlay funds are not necessary for transfer. Alternatively, if a roadway or roadway section has a PCI of 50 or less, the City will only accept said roadway once a PCI of 70 or higher is achieved by the County or the Parties mutually agree upon a funding level equivalent to upgrading of the roadway to a PCI of 70 or higher.

5.2.1 For any County minor arterial, collector, connector or local street within the City boundary that is being transferred, but subsequent to annexation, the County shall allow improvements to be constructed to City standards and defer permitting authority to the City. The City shall issue all appropriate permits directly to the developer.

5.2.2 For any improvements to a County major arterial road within the City boundary, the County shall determine if City standards along the major arterial are acceptable to the County and do the following:

A. If the City standards are acceptable to the County, the County shall allow all improvements to be constructed to City standards. The County shall issue all appropriate permits with City concurrence.
B. If the proposed cross section standards are not acceptable to the County, the County shall require those improvements to be constructed to County standards. The County shall issue all appropriate permits.

5.3. City Notice to and Coordination with the County and CPOs.

5.3.1. The City shall provide notice to the County and the appropriate active CPOs at least 20 days prior to the first public hearing on all proposed annexations or extraterritorial service extensions into unincorporated areas.

5.3.2. The City shall provide notice to the County at least 20 days prior to the first scheduled public hearing on all proposed legislative changes to the City Comprehensive Plan or any quasi-judicial hearings regarding properties adjacent to unincorporated areas within the HVUPAE.

5.3.3. The City shall notify and coordinate with the County on amendments to the City TSP.

5.3.4. City shall provide notice and a service-provider comment letter to the applicable County Department in conjunction with the City's review of any land use application or building permit in which the proposed development activity might affect County facilities.

6. Other County Responsibilities.

6.1. County Notice to and Coordination with the City for Lands in HVUPAE.

6.1.1. The County shall provide notice to the City at least 20 days prior to the first scheduled public hearing on all proposed legislative changes to the County Comprehensive Plan text, implementing ordinances or other land use policies affecting land within the HVUPAE, and shall provide notice to the City at least 20 days prior to the first scheduled quasi-judicial public hearing regarding any properties adjacent to the City's incorporated area.

6.1.2. The County shall provide notice to the City at least 20 days prior to a staff decision on any Type II application for administrative action as provided in the ZDO for property within the HVUPAE.

6.1.3. The County shall notify and invite City staff to participate in or comment on all pre-application meetings for design review, conditional use permits, partitions, subdivisions or other significant development proposals within unincorporated areas of the HVUPAE at least 15 days prior to any such meeting.

6.1.4. Any amendments proposed by the County to the UGB within one mile of the HVUPAE will be reviewed jointly by the City and the County prior to submission to Metro.

6.1.5. In any County land use proceeding affecting property within the HVUPAE, the County shall enter all written comments received from the City into the public record and shall consider such written comments in the exercise of its planning and plan implementation responsibilities.

7. Mutual Indemnification

7.1 Subject to Article XI of the Oregon Constitution and ORS 30.260 to 30.300, the City will hold harmless, defend and indemnify the County, its elected officials, officers, and employees, for and against any claims or damages to property or injury to persons, resulting in whole or part from City's acts or omissions in performing any obligations under this Agreement.

7.2 Subject to Article XI of the Oregon Constitution and ORS 30.260 to 30.300, the County will hold harmless, defend and indemnify the City, its elected officials officers and employees for and against any claims or damages to property or injury to persons, resulting in whole or part from the County's acts or omissions in performing any obligation under this Agreement.

8. General Provisions.

8.1 Applicable Law. This Agreement shall be governed by Oregon law, without giving effect to the conflict of law provisions thereof, and the Parties agree to submit to the jurisdiction of the courts of the State of Oregon.

8.2 Insurance Coverage.

8.2.1. Commercial General Liability Insurance. Each of the Parties shall obtain and maintain at all times during the course of this Agreement commercial general liability insurance coverage pursuant to Oregon Tort Claims Act and subject to the limits of the Act covering Bodily Injury and Property Damage on an "occurrence" form in the amount of not less than $1 Million per occurrence/$2 Million general aggregate for the protection of the other Party, its officers, elected officials and employees. This coverage shall include Contractual Liability insurance for the indemnity provided under this Agreement.

8.2.2. Notice of Cancellation. There shall be no cancellation, material change, exhaustion of aggregate limits or intent not to renew any Party's insurance coverage contemplated by this Agreement without 60 days written notice to the other Party. Any failure to comply with the provision will not affect the insurance coverage provided to the Party. The 60-day notice of cancellation provision shall be physically endorsed on to the policy.

8.2.3. The County may self-insure to meet the minimum insurance requirements of this Section 8.2, to the extent that it maintains a self-insurance program that complies with the insurance requirements applicable under this Section 8.2.

8.3 Effective Date and Term. This Agreement shall become effective on the last date signed below and shall continue in effect according to its Terms.

8.4 Amendment. This Agreement may be amended at any time consistent with Section 8.9 below.

8.5 Assignment. Except as otherwise provided herein, the Parties may not assign any of their rights or responsibilities under this Agreement without prior written consent from the other Party, except that a Party may delegate or subcontract for performance of any of their responsibilities under this Agreement.

8.6 Dispute Resolution.

8.6.1. Subject to mutually agreed upon extensions of time in writing, failure or unreasonable delay by any party to substantially perform any material provision of this agreement shall constitute default. In the event of an alleged default or breach of any term or condition of this agreement, the Party alleging such default or breach shall give the other Party not less than 30 days written notice specifying the nature of the alleged default and the manner in which the default may be cured satisfactorily. During this 30-day period, the Party shall not be considered in default for purposes of termination or instituting legal proceedings.

8.6.2. The Parties shall first attempt to resolve the dispute by negotiation, followed by mediation, if negotiation fails to resolve the dispute.

8.6.3. Step One: (Negotiation). Each Party will select one or more person(s) to negotiate on behalf of the entity they represent. Those person(s) shall then meet and attempt to resolve the issue. If the dispute is resolved, there shall be a written determination of such resolution, signed by a representative of each Party and ratified by the governing bodies that shall then be binding.

8.6.4. Step Two: (Mediation). If the dispute cannot be resolved within thirty (30) days at Step One, the Parties may submit the matter to mediation. The Parties shall attempt to agree on a mediator. If they cannot agree, the Parties shall request a list of five (5) mediators from an entity or firm providing mediation services. The Parties will attempt to mutually agree on a mediator from the list provided, but if they cannot agree, each Party shall select one (1) name. The two selected shall select a third person who shall serve as the mediator. The common costs of mediation borne equally by the Parties with each bearing its own costs and fees. If the issue is resolved at this step, a written determination shall be signed by each Party and approved by the governing bodies.

8.6.5. Step Three (Legal Action). If the dispute remains unresolved following mediation, the Parties may seek remedy by appropriate proceedings filed in Clackamas County Circuit Court. In any such judicial proceeding, each Party shall be responsible for its own costs and fees.

8.7 Execution in Counterparts. This Agreement may be executed in any number of counterparts, each of which may be executed by any one or more of the parties hereto, and all of such counterparts shall constitute one Agreement. Counterparts of executed signature pages may be attached to any one or more counterparts of this Agreement. To facilitate execution of this Agreement, the Parties may execute by facsimile or e-mail transmission counterparts of the signature pages.

8.8 Severability. In the event a court of competent jurisdiction deems any portion or part of this Agreement to be unlawful or invalid, only that portion of part of the Agreement shall be considered unenforceable. The remainder of this Agreement shall continue to be valid.

8.9 Entire Agreement. This Agreement constitutes the entire agreement between the Parties and supersedes any prior oral or written agreements or representations relating to the HVUPAE. No waiver, consent, modification or change of terms of this Agreement shall bind the Parties unless in writing and signed by each party.

8.10 Non-Exclusive Rights and Remedies. Except as otherwise expressly provided herein, the rights and remedies expressly afforded under the provisions of this Agreement shall not be deemed exclusive and shall be in addition to and cumulative with all rights and remedies otherwise available at law or in equity. The exercise by either Party of any one or more of such remedies shall not preclude the exercise by it, at the same or different times, of any other remedies for the same default or breach, or for any other default or breach, by the other Party.

8.11 Debt Limitation. This Agreement is expressly subject to the debt limitation of Oregon counties set forth in Article XI, Section 10, of the Oregon Constitution, and is contingent upon funds being appropriated therefore. Any provisions herein which would conflict with law are deemed inoperative to that extent.

8.12 Waiver. The failure of either Party to enforce any provision of this Agreement shall not constitute a waiver by such Party of that or any other provision.

8.13 Interpretation. The titles of the sections of this Agreement are inserted for convenience of reference only and shall be disregarded in construing or interpreting any of its provisions.

8.14 No Third-Party Beneficiary. Neither Party intends that this Agreement benefit, or create any right or cause of action in, or on behalf of, any person or entity other than the County or the City.

8.15 Notices. All notices or other communications required or permitted under this Agreement shall be in writing, and shall be mailed or sent by scanned document (e-mailed) or faxed with hard copy to follow by post, addressed as follows:

To City: City of Happy Valley
Economic & Community Development Department
16000 SE Misty Drive
Happy Valley, OR 97086

DocuSign Envelope ID 0D422339-34FF-4403-B293-E391A7AFA253

To County: Clackamas County Planning & Zoning Division
150 Beavercreek Rd.
Oregon City, OR 97045

IN WITNESS WHEREOF, the respective Parties have caused to be signed on their behalf and enter into this Agreement on the last date indicated below.

CITY OF HAPPY VALLEY

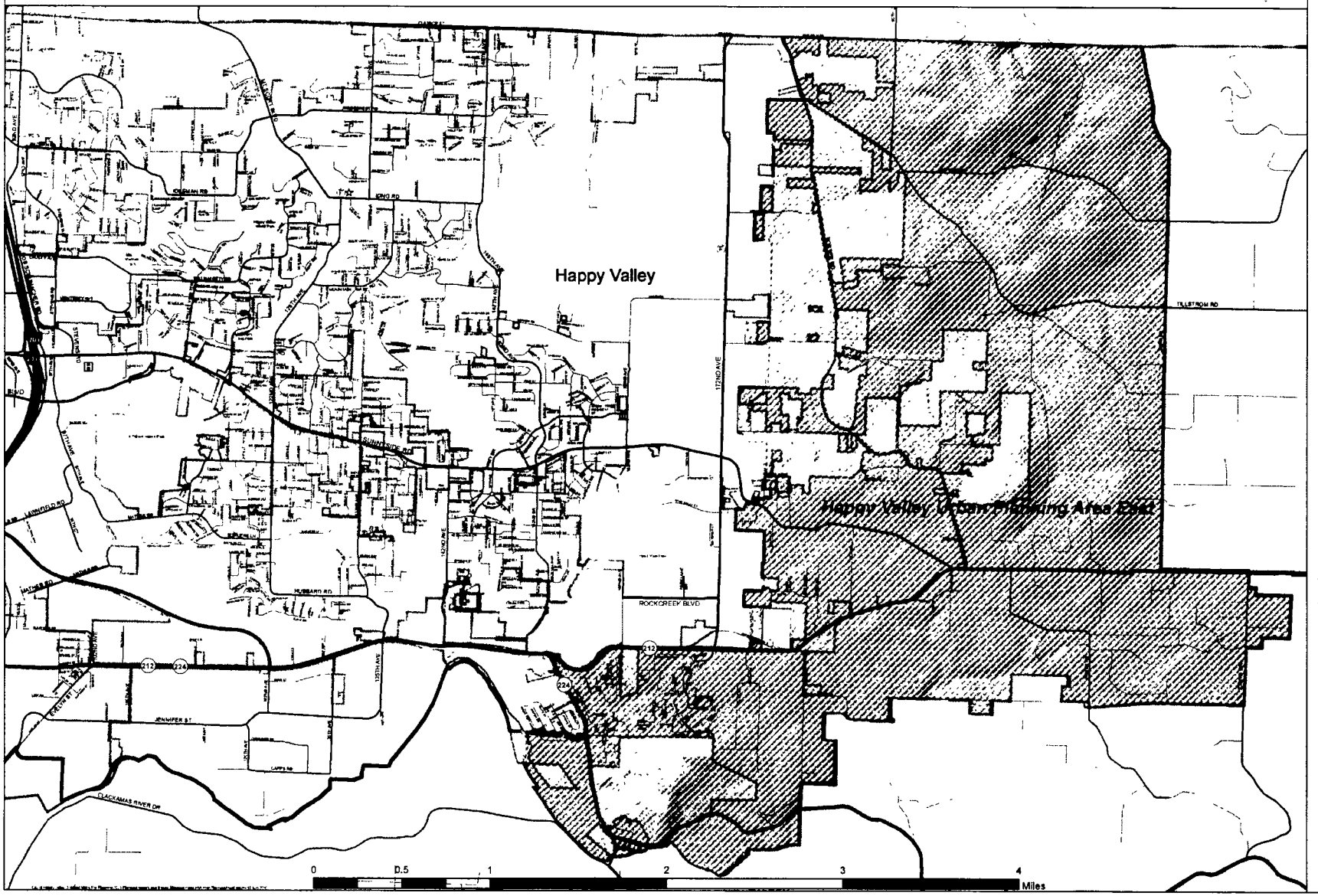
By DocuSigned by: Tom Ellis 10F80C7CEFCD433 Date 10/26/2021
Mayor

CLACKAMAS COUNTY

By _____ Date 11/24/2021
Chair, Board of County Commissioners

DocuSign Envelope ID 0D422339-34FF-4403-B293-E391A7AFA253

EXHIBIT A - Happy Valley Urban Planning Area East Map



HAPPY VALLEY, OR
EST. 1965

- Happy Valley City Hall
- SM_Roundabout
- Happy Valley Boundary
- Happy Valley Urban Planning Area East
- County Boundary
- Urban Growth Boundary
- Current Happy Valley UGMA
- Tax lots

Streets

- Interstate Highway
- State Highway
- Major Arterial
- SM_Roundabout
- Minor Arterial
- Collector
- Neighborhood Residential/Local Private

Source: Data from Clackamas County GIS (2010)

FINAL

City of Oregon City

GEOGRAPHIC INFORMATION SYSTEM

Beavercreek Concept Plan - Proposed Comprehensive Plan

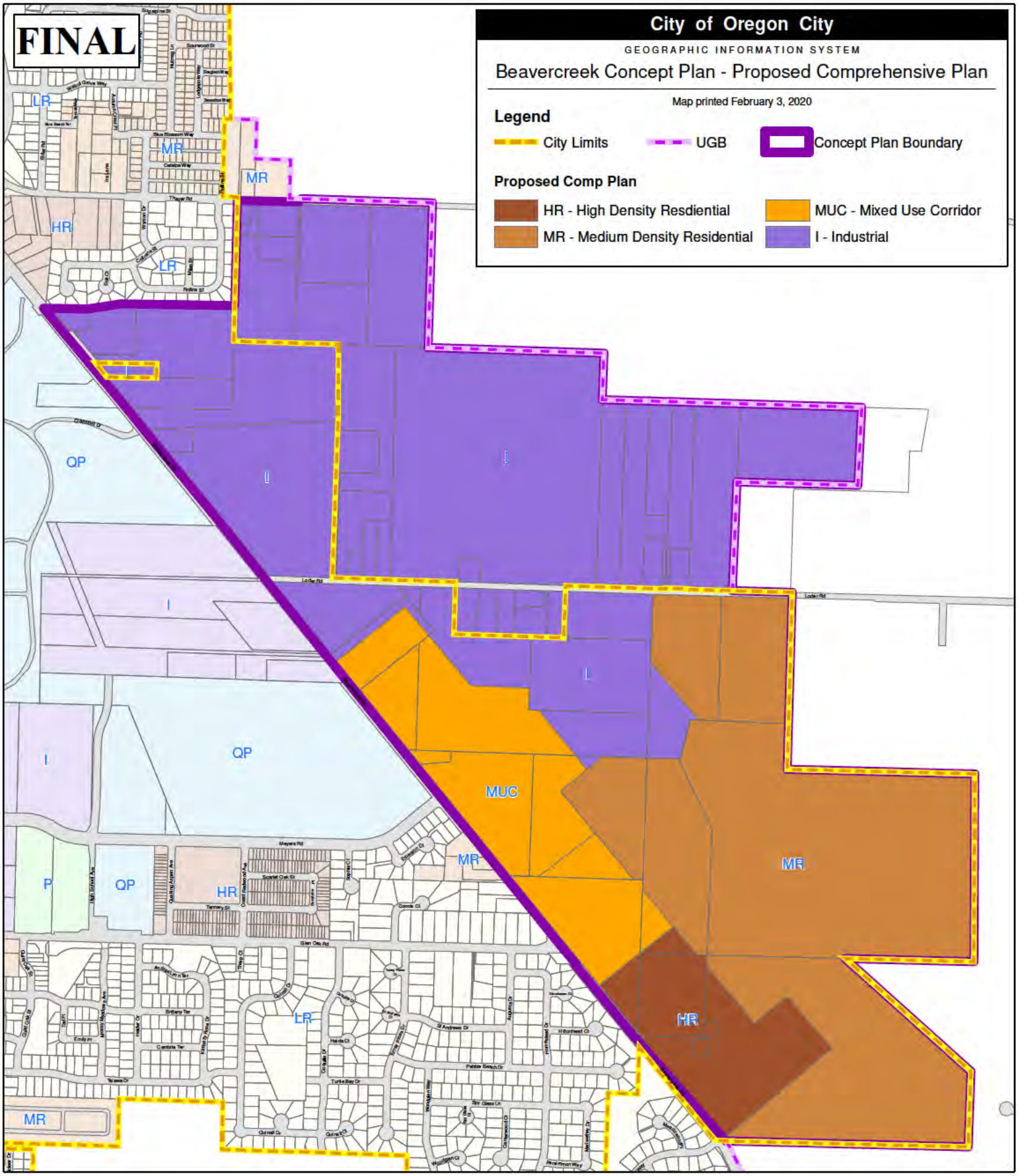
Map printed February 3, 2020

Legend

City Limits | UGB | Concept Plan Boundary

Proposed Comp Plan

- HR - High Density Resdiential
- MR - Medium Density Residential
- MUC - Mixed Use Corridor
- I - Industrial



LEG 19-0003

Beavercreek Road Concept Plan - Zoning and Code Amendments

0 450 900 Feet

1 inch = 900 feet

The City of Oregon City makes no representations, express or implied, as to the accuracy, completeness and timeliness of the information displayed. This map is not suitable for legal, engineering, or surveying purposes. Notification of any errors is appreciated.

N W E S

City of Oregon City
P.O. Box 3040
625 Center St
Oregon City, OR 97045
503-657-0891 phone
503-657-6629 fax
www.orcity.org

OREGON CITY

Plot date: February 3, 2020
Plot name: Beavercreek Concept Plan - Proposed Comp Plan - 8x10P - 20200203.pdf
Map name: Beavercreek Concept Plan - Proposed Comp Plan - 8x10P.mxd

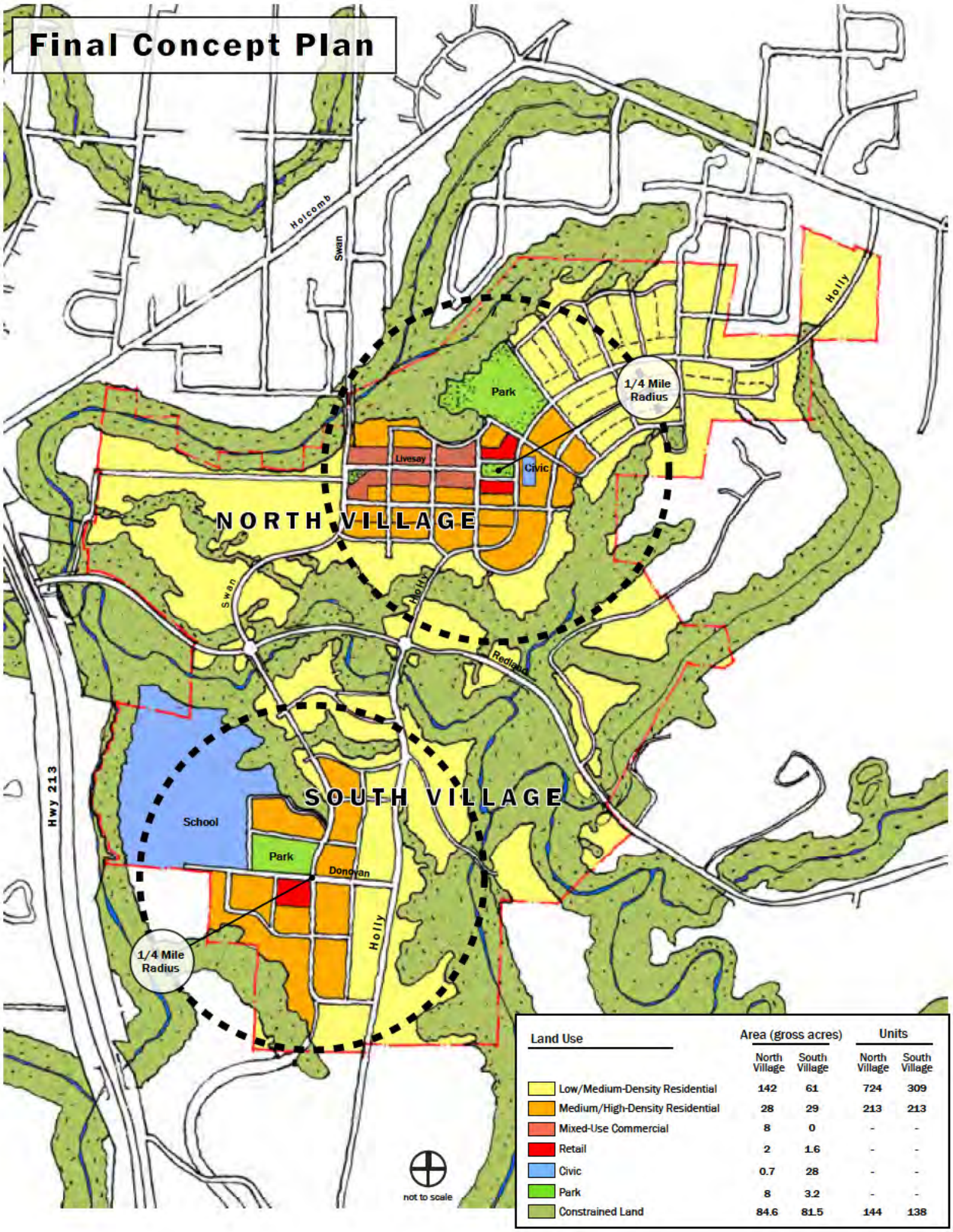


Figure 1-1. Park Place Concept Plan Urban Growth Diagram

This map is for concept planning purposes only. The specific locations of natural resource boundaries, open space, parks, land uses, roads, trails, infrastructure and related improvements may change and is subject to on-site verification and design at the time of development.

City of Oregon City

GEOGRAPHIC INFORMATION SYSTEM

Proposed Comprehensive Plan Designations

- LR - Low Density Residential
- MR - Medium Density Residential
- HR - High Density Residential
- Mixed Use-Corridor
- QP - Public/Quasi Public
- City Limits
- UGB
- Study Area

South End Concept Plan

OREGON CITY

The City of Oregon City makes no representations, express or implied, as to the accuracy, completeness and timeliness of the information displayed. This map is not suitable for legal, engineering, or surveying purposes. Notification of any errors is appreciated.

N W E S

0 0.25 0.5 Miles

0 1,000 2,000 3,000 Feet

City of Oregon City
P.O. Box 3040
625 Center St
Oregon City, OR 97045
503-657-0891 phone
503-657-6629 fax
www.orcity.org

OREGON CITY

Plot date: March 21, 2014
Plot name: SECP - Proposed Comp Plan - 11x17P - 20140321.pdf
Map name: SECP - Proposed Comp Plan - 11x17P.mxd

Please recycle with colored office grade paper.

Miriam Hanes

From: Fritzie, Martha <[redacted]>
Sent: Thursday, August 22, 2024 3:16 PM
To: Metro 2040
Subject: [External sender]Clackamas County Staff Comments - Draft UGR 2024
Attachments: Metro Draft UGR Technical Staff Letter_ClackCo_082224.pdf

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Thank you for considering the attached comments from Clackamas County staff regarding the draft UGR Report.

Please feel free to reach out to me with any questions,
Martha

Martha Fritzie, Principal Planner
Clackamas County DTD|Planning & Zoning
150 Beavercreek Road|Oregon City, OR 97045
[redacted]

Working hours 7:30am to 6:00pm|Monday – Thursday

Please visit our **webpage** for updates on Planning services available online, service hours and other related issues.



Follow Clackamas County: Facebook | Twitter | YouTube | Nextdoor

PMAR
PORTLAND METROPOLITAN ASSOCIATION OF REALTORS®

August 22, 2024

Urban Growth Management Team
Metro
600 NE Grand Avenue
Portland, OR 97232

Dear Metro Urban Growth Management Team,

I am writing on behalf of the Portland Metropolitan Association of Realtors® (PMAR) regarding Metro's Draft Urban Growth Report. We appreciate the extensive work Metro's staff put into the Urban Growth Report. We would also like to thank Metro for inviting PMAR to the Urban Growth Report Stakeholder table; it was a welcome opportunity to better understand the report's underlying work, data, and assumptions, and to discuss some of our region's challenges and opportunities with other stakeholders.

PMAR recognizes the Portland region is lacking tens of thousands of homes necessary to meet our growing population and that people in our community suffer due to this lack of housing. Our region's current level of housing construction is 10.1% below the long-term average, and no where near on pace to catch up with past underproduction, let alone accommodate future growth. Portland in particular is struggling to keep up with needed housing production; the city is on track to produce only 500 new units this year, when the forecasted need by 2045 is more than 120,000 new homes.

As a region, we must embrace land use, development, and zoning principles that provide and encourage an abundant mix of housing types that meets community needs and provides sufficient housing for current and future residents. Restrictive land use regulations play a major role in stymying the proliferation of new housing. Accordingly, PMAR supports much needed growth in the Metro area's capacity for housing development, which removes a barrier to housing construction; getting the 2024 growth management decision right will support the continued growth and prosperity of our entire region.

In that spirit, PMAR strongly urges Metro to adopt a higher growth population forecast, and urges the Metro Council to support the City of Sherwood's request for expansion.

<u>Population Forecast</u>

The draft report forecasts regional population growth "only from net in-migration," due to lower

forecasted birth rates, and assumes that growth rates will be slower as a result over the next 20 years.

While this is a reasonable assumption, it fails to recognize that the policy choices we make today will impact whether or not our region is a place that attracts new residents over the next 20 years. Put another way, if we plan for low growth, we are unlikely to see anything other than low growth. But if we plan for robust growth, and make policy choices that support a vision of higher growth, our region becomes a more attractive place to future residents.

We strongly recommend adoption of the higher growth population forecasts, to set the stage for nearer term policy decisions and actions that will in turn foster stronger population growth, and help our region realize economic growth and prosperity.

City of Sherwood Expansion

PMAR supports the City of Sherwood's expansion proposal, particularly the 340 net acres of residential land proposed in the Sherwood West Concept Plan. PMAR believes that there is no one-size-fits-all to housing and that a vast array of homes of various types and at various price-points are needed to serve members of the community, accommodate new residents, and ensure that members of our community can buy a home that fits their unique needs. Accordingly, while Metro may want to make recommendations or provide incentives to encourage certain kinds of housing development, PMAR would discourage prescriptive requirements or new regulations that would limit Sherwood's housing development options.

PMAR is committed to working collaboratively with Metro and other stakeholders to ensure that our region's growth management decision is implemented in a way that benefits all residents and facilitates growth of the housing market.

Michele Gila
Director of Realtor® Advocacy

Miriam Hanes

From: Amy Ruiz <[redacted]>
Sent: Thursday, August 22, 2024 3:17 PM
To: Metro 2040
Cc: Michele Gila; Kari Chisholm
Subject: [External sender]Fwd: UGR comments
Attachments: PMAR UGR Report Comments 08222024.pdf

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Attached, please find comment on the Urban Growth Report from Portland Metropolitan Association of Realtors®. Thank you for the opportunity to weigh in.

Best,
Amy Ruiz

—
Amy Ruiz
[redacted]
Partner, Swift Public Affairs
[redacted]

Miriam Hanes

From: Patty Hales [redacted]
Sent: Thursday, August 22, 2024 6:07 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]Sherwood Urban growth boundary

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Patricia Hales

Miriam Hanes

From: Jessica Pelz [redacted]
Sent: Friday, July 26, 2024 4:16 PM
To: Metro 2040
Cc: Stephen Roberts; Erin Wardell; Theresa Cherniak
Subject: [External sender]2024 UGR Testimony - Washington County Board of Commissioners
Attachments: BCC - Urban Growth Report Comment Letter 07-16-24.pdf

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Dear Urban Growth Management Team,

Please accept the attached letter from the Washington County Board of Commissioners into the public record for the 2024 Urban Growth Report.

Thank you,
Jessica

Jessica Pelz, AICP | Policy Analyst
Washington County Department of Land Use & Transportation
Office of the Director
[redacted] | Hillsboro, OR 97124
[redacted]

INFO: Washington County email address has changed from @co.washington.or.us to @washingtoncountyor.gov. Please update my contact information.

July 16, 2024

Metro Council
600 NE Grand Ave.
Portland, OR 97232

RE: Draft 2024 Urban Growth Report

Dear Chair Peterson and Metro Councilors,

Thank you for the opportunity to comment on the draft Urban Growth Report (UGR) and Sherwood West urban growth boundary (UGB) expansion proposal. The 2024 growth management decision is the blueprint for how Metro Council will lead the region in planning for future housing development and employment opportunities. We appreciate that these decisions are challenging and acknowledge there are trade-offs that must be carefully considered in this decision process.

Our Board strongly supports the City of Sherwood's application for expansion of the urban growth boundary to include the 1,291 acres within the Sherwood West urban reserve area. The city has demonstrated their readiness to serve the area with governance and infrastructure as required by Metro's Urban Growth Management Functional Plan. The City's plan envisions that up to 5,582 housing units and 4,524 jobs could be accommodated in the expansion area. As we are all grappling with ways to produce more housing in the region and across the state, adding this land to our regional urban growth boundary makes sense. In addition, Sherwood has shown that the proposed Sherwood West employment area has the site suitability characteristics to attract more of the types of industry that Sherwood has successfully recruited to the city in recent years. Even though this is a regional urban growth boundary expansion decision using regional analysis, place matters in this consideration. Sherwood has demonstrated that they are a place where people want to both work and live.

We also encourage Metro Council to strongly consider selecting the high growth rate for both population and employment. The selected growth rates guide regional policy and funding decisions around housing, employment land and supporting infrastructure. Choosing low growth rates could artificially constrain our ability to plan for or make decisions to support the development of badly needed housing of all types, or further constrain opportunities to grow our region's traded-sector employment, which provides living wage jobs for thousands of our community members.

Board of County Commissioners
[redacted] Hillsboro, OR 97124-3072
[redacted]

Thank you for your consideration. We look forward to continued partnership with Metro in planning to accommodate future growth to keep our region a thriving and great place to live.

Sincerely,



Chair Kathryn Harrington
On behalf of Washington County Board of Commissioners

Cc: Board of County Commissioners
Sherwood City Council
Stephen Roberts, Director of Land Use & Transportation, Washington County
Catherine Ciarlo, Director of Planning, Development and Research, Metro

Board of County Commissioners
[redacted], Hillsboro, OR 97124-3072
[redacted]

Miriam Hanes

From: Brandi Hendryx <[redacted]>
Sent: Thursday, August 22, 2024 6:32 PM
To: Metro 2040; Marissa Madrigal; Lynn Peterson; Gerritt Rosenthal; Ashton Simpson; Mary Nolan; Christine Lewis; Juan Carlos Gonzalez; Duncan Hwang; [redacted]
Cc: [redacted]
Subject: [External sender]2024 Sherwood West Urban Growth Boundary Expansion Proposal - Opposition

CAUTION: This email originated from an **External source.** Do not open links or attachments unless you know the content is safe.

To whom it may concern,
As long time residents (since 1997) and taxpayers of Sherwood, we strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. We stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Brandi & Tony Hendryx
[redacted]

My name is Julie Horowitz.

My family and our family farm is on the edge of the UGB expansion area. We've lived here 25 years.

I am a supporter of the West of Sherwood Farm Alliance.

The Mayor of Sherwood and Planning Director have testified publicly that what will be built in the Sherwood UGB expansion area will be market-rate housing, not affordable housing.

According to Redfin the average rent in Sherwood is $2,704 per month.

That is $700 more per month than in Beaverton, $900 more per month compared to Portland and $1,000 more per month than in Gresham.

If you assume a household is willing - or forced - to pay 30% of its pre-tax income on rent in Sherwood, they will need to earn $108,000 per year to afford that rent.

No teacher in Sherwood schools, even one with a master's degree and many years of experience, can afford that rent. No one working in the proposed "hospitality commercial" area in the Concept Plan would even dream of renting in Sherwood.

The average home price in Sherwood, according to Zillow, is about $650,000.

A family would need a household income of about $172,000 to buy that housing, assuming they had saved $130,000 for the downpayment and could get a 6.5% interest rate. And they would still be paying 30% of their pre-tax income for their home.

The idea that adding land for housing in Sherwood will contribute to the supply of affordable housing in the region is ridiculous. Ridiculous.

If MPAC is really interested in UGB expansions that might, *might*, contribute to the supply of truly affordable housing, you should recommend that the Metro Council reject this proposal and instead wait to consider UGB expansion applications are made under Governor Kotek's Senate Bill 1537.

That bill will go into effect in January, a few weeks after Metro is scheduled to make its decision on the Sherwood luxury housing proposal.
****

Julie Horowitz

Miriam Hanes

From: Julie Horowitz [redacted]
Sent: Wednesday, August 21, 2024 5:15 PM
To: Metro 2040; Sherwood Farm Alliance
Subject: [External sender]2024 Sherwood West Urban Growth Boundary Expansion Proposal

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To Whom it May Concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Julie Horowitz

Miriam Hanes

From: Jim Huston [redacted]
Sent: Thursday, August 15, 2024 5:06 PM
To: Metro 2040
Cc: Jan Huston; [redacted]
Subject: [External sender]We Say NO to the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary

CAUTION: This email originated from an **External source.** Do not open links or attachments unless you know the content is safe.

We Say NO to the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary
[redacted]

To whom it may concern:

As residents and taxpayers of Sherwood, we strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes.

The proposed expansion is unnecessary because:

- Metro's own projections from 2022 forecast only 3% growth for Sherwood in coming decades.
- Sherwood has sufficient land already to support additional housing and economic development - if developed wisely. The desires of Sherwood City to expand its tax base and of developers to gain additional lands for development are not adequate justification for the proposed expansion.
- Minimal support from the local community. In a 2021 poll, 84% of Sherwood residents opposed the UGB expansion in and around Sherwood.
- There are currently large areas of undeveloped land that have been brought inside the UGB in the last 20 years. According to projections, there is sufficient industrial land within the current boundary for the next 20 years. This proposed expansion (or a modified version) can be revisited in 10-12 years, but at this time it is completely unnecessary.

We stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community. Senate Bill 100 as enacted in 1973 was done specifically to prevent the kind of development that this proposed expansion clearly is - driven by private interests and profits rather than the public interest.

Sincerely,

Jim and Jan Huston
[redacted] Sherwood OR

Miriam Hanes

From: Eric Rutledge <[redacted]>
Sent: Friday, August 2, 2024 12:16 PM
To: Miriam Hanes
Cc: Molly Cooney-Mesker; Eryn Kehe
Subject: [External sender]Fwd: Sherwood West UGB Expansion Support

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Wanted to make sure this made it to you.

Thanks!

Eric Rutledge
City of Sherwood
Community Development Director
[redacted]
Desk [redacted]
Work Cell [redacted]

From: Troy Kazebee [redacted]
Sent: Sunday, July 14, 2024 5:17:14 PM
To: [redacted]>
Cc: [redacted] <[redacted]>; [redacted] >; [redacted] Tim Rosener [redacted]
Subject: Sherwood West UGB Expansion Support

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Dear Mr. Rosenthal,

I am Troy Kazebee, and together with my wife Kendra, we are the owners of the property at 19300 SW Edy Rd in Sherwood. We strongly endorse the Urban Growth Boundary expansion proposed for Sherwood West.

For the past 22 years, we have proudly called Sherwood our home, raising our four children and residing in various neighborhoods within the city. As our family grew, Sherwood provided the housing options we needed, with connected neighborhoods and walking paths that have fostered a unique community atmosphere.

Throughout this time, we have actively participated in and contributed to the Sherwood West Planning process over the last decade. The proposed plan, encompassing 1,291 acres, addresses both Sherwood's and Metro's housing and employment land shortages. It builds upon

Sherwood's established character with connected neighborhoods, walking paths, and parks, elements that have kept us committed to this community.

Recently, we have been approached by the West of Sherwood Farm Alliance urging us to oppose the UGB expansion. Their involvement at this late stage is concerning given their absence from earlier planning discussions. However, having closely followed and studied the proposal over the years, and recognizing the housing and employment land shortages faced by Metro, we firmly believe it aligns with the future needs of Sherwood and Metro.

Therefore, we wholeheartedly support the City of Sherwood's request for a 1,291-acre UGB expansion.

Thank you for your time and consideration. If you have any questions, please reach out.

Sincerely,

Troy and Kendra Kazebee

[redacted]

[redacted]

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HOME BUILDING ASSOCIATION
OF GREATER PORTLAND

August 22nd, 2024

Marissa Madrigal, COO
Metro
600 NE Grand Ave.
Portland, OR 97232

Cc:
President Lynn Peterson
Councilor Ashton Simpson
Councilor Christine Lewis
Councilor Duncan Hwang
Councilor Gerritt Rosenthal
Councilor Juan Carlos Gonzalez
Councilor Mary Nolan

RE: Metro's 2024 Urban Growth Report and Sherwood's Urban Growth Boundary Expansion Request

Dear Ms. Madrigal,

My name is Preston Korst and I'm the Director of Government Affairs at the Home Building Association of Greater Portland. HBA is dedicated to maximizing housing choice for all who reside in our region by shaping an environment in which industry professionals can meet the diverse needs of all communities.

I'd like to start off by personally thanking you and the rest of Metro's planning staff, including Katherine Ciarlo, Eryn Kehe, Ted Reid, Malu Wilkinson (and many more) for hosting and facilitating the Urban Growth Report Stakeholder Roundtable. This broad and diverse group of interested parties met for two hours monthly for nearly a year to discuss and debate the central tenants of the Urban Growth Report (UGR) and the impacts it will have on our region. As HBA's representative in that group, I can say that it provided much needed dialogue and reflection space for us to discuss how we as a region wish to grow. Your willingness to provide that opportunity is greatly appreciated.

In this letter, we hope to outline our industry's perspective on the 2024 Draft UGR and to provide our unequivocal support for the City of Sherwood's Urban Growth Boundary (UGB) expansion request.

For housing affordability and the overall health of our economy, HBA and many others in the housing industry urge your COO Recommendation and Metro Council to take a high-growth position when evaluating our region's land supply and housing needs in this UGR and move to approve Sherwood's UGB request without conditions.

Consider for a moment the exorbitant costs to purchase a home in our region. According to Zillow, the median home sale price in June was $521,133 (Multnomah County), $579,979 (Washington County), and

$631,000 (Clackamas County). Staggering as these figures are, they come as no surprise given that Oregon is staring down a housing deficit of 140,000 units. And if our goal is to advance economic justice and racial equity, then we must reverse these trends in a way that builds wealth and increases homeownership opportunities for more families who've traditionally been locked out of the homebuying market. In other words, WE ARE IN A HOUSING CRISIS.

- -

UGR Question #1: Which population and growth projections should Council make?

With the UGR, we believe that the focal and starting point rests primarily on the population and growth scenarios presented in the report. While the draft contains a lot to applaud—including acknowledgements of an existing regional housing shortage, changing housing choices due to the pandemic, and the creation of newly allowed middle housing options—it still includes elements that are concerning for our industry.

For one, the report concludes that regional population growth is slowing because birthrates are dropping (which of course is an established national trend). This means that in-migrating residents will be the primary driver of our population growth, as it has been in recent years. This analysis makes sense. However, the report erroneously assumes that, "Slowing population growth also means slower job growth." We respectfully disagree.

Though we concur that we can't necessarily change what the data tells us, we *can* choose policies that will bend the precision of that data towards a stronger economic future. In other words, if we use this growth report to prepare for strong economic and housing growth, we believe that in-migration will adapt towards a higher-opportunity future—if you build it, they will come. On the flipside, if we plan for anemic growth and limit our ability to adapt to the market, we'll just be realizing our own economic stagnation. In either case, it's a self-fulfilling prophesy.

UGR Recommendation #1: assume and position the report with the high-growth population scenario.

We feel that Metro would not only be wise, but would be making the most responsible public-policy decision to plan for growth, despite what projections may or may not suggest. Preparing with an attitude of a high-growth scenario provides Metro and local jurisdictions with more flexibility to plan for the future that will avoid future housing crises and economic stagnation. As we hear often from planners: *failing to plan is planning to fail*.

- -

UGR Question #2: How should Council approach housing need and development scenarios?

To start, we want to acknowledge the fact that Metro staff included in this report an existing housing shortage of 23,700 units. While many in the housing industry would argue (with additional sources) that number is considerably low, it is still an important indication of how serious our housing crisis is to Metro. Moving on from there, we appreciate the difficult work that went into calculating our housing needs over the next 20 years. And we believe it would be misleading, if not negligent, to suggest that our region's housing needs are anything except *high*. Therefore, **we urge Metro to adopt the high-forecast housing need of at least 203,200 units over the next 20 years**. This reflects a greater sense of reality than the baseline or low-point figures hold.

Additionally, in the report, Metro also makes assumptions about not only the rate of our growth, but also *how we will and should grow*. Found on pages 38-39, the report contains several assumptions for development potentials using "illustrative demand and capacity scenarios." While we aren't exactly sure which data these trends were founded upon, we do feel that they all but marginalizes and unduly prevents the construction of new, single-family homes for residents. It assumes, either through economic reality or lifestyle choices, that our region's historically strong demand for homeownership isn't a viable scenario going forward. Again, we disagree.

And importantly, just after the limited scenarios are presented, the report goes on to say that "…it will be the market, not Metro's UGR calculations, that determine what mix of middle housing and single-unit detached housing gets built…" Yet, in the way that the housing needs scenarios are presented, Metro is essentially asking its Council to do just that by attaching to their decision a condition and outcome which will essentially select which types of housing should get built. Housing construction is a market-driven industry, with the overwhelming majority being built by private developers. We believe that it is not within Metro's power or provision to attempt to guide the mix of housing the market will bear, least of all with just four narrow scenarios.

UGR Recommendation #2: Metro should adopt a high-forecast housing need. Also, it should reject the growth scenarios presented in the UGR or establish an additional scenario that creates flexibility for the housing market to adapt to the demand of consumers.

A high need scenario reflects the reality on the ground and will allow policymakers across the region take actions that will address the high cost of housing in their communities. Also, we believe that the forecasted development scenarios have been created despite the fact that nearly 4 out of 5 Oregonian's still prefer to live in a single-family home versus other housing types. And it fails to recognize the power that public-policymaking has on the creation of new housing, which could make single-family entry-level homes more affordable. Lastly, it ignores the fact that the vast majority of homeownership opportunities lie in the single-family market. We believe that Metro should consider that our region's collective desire to foster equity and economic justice will rely on the unique wealth and community-building opportunities that arise with homeownership.

City of Sherwood UGB Expansion Request

This year, the City of Sherwood is the only city requesting a UGB expansion—and we believe that it would have a tremendous impact on our region, in the form of 4,500 good-paying jobs, roughly 5,000 new homes, and the creation of hundreds of acres of parks and natural areas.

For almost two years, I had the pleasure of sitting on the Sherwood West Technical Advisory Committee which helped shape the concept planning for the area. I can say without reservation that the plan brought forward by staff, regional stakeholders, and community members has been careful, conscientious, and equitable. **We applaud the delivered outcome and encourage Metro to move forward with an approval that encompasses the entirety of the 1,291 acres as requested, *without conditions.***

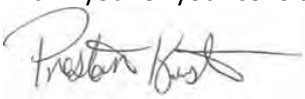
As Metro knows well, bringing new lands into the UGB requires focused planning, financing for infrastructure, and a building environment that can support growth. Fortunately, Sherwood is primed for just that. Over the last several years, the city has undergone extensive public engagement to develop a plan that is innovative, forward-thinking, and contains a variety of tools that will create complete and livable communities. However, adding conditions as suggested in a recent Council Session, could be

detrimental to that extensive outreach. There are serious political costs to adding conditions, not to mention the hundreds of thousands of dollars in grants and general fund dollars would be jeopardized if onerous restrictions are placed on this community-led design.

Given the continued severity of our region's housing crisis, mixed with the budding opportunities to capitalize on historic investments for local economic development—HBA and our partners in the housing sector view this request as a great example of a planning process that will bear fruit for generations. It will help empower our region to reach its housing production goals while creating an indispensable lifeline to a struggling local economy. For affordability and the overall supply of housing, the Sherwood West proposal is an undeniably smart plan that deserves the community's support and Council's unanimous vote.

In closing, we would like to thank Metro staff and Council for the dedicated service they offer to our communities. From long-range planning to affordable housing development, the work you do is not easy and the stakeholder groups you engage are broad and not always agreeable. We appreciate the efforts taken to develop the 2024 Draft UGR and to review Sherwood's 2024 UGB Expansion. And we implore you to consider the serious housing crisis we are facing when making your ultimate recommendations and decisions.

Thank you for your consideration of our testimony,



Preston Korst
Director of Public Policy and Government Affairs
Home Building Association of Greater Portland

Miriam Hanes

From: Preston Korst <[redacted]>
Sent: Thursday, August 22, 2024 3:45 PM
To: Metro 2040; Marissa Madrigal
Cc: Lynn Peterson; Ashton Simpson; Christine Lewis; Duncan Hwang; Gerritt Rosenthal; Juan Carlos Gonzalez; Mary Nolan
Subject: [External sender]HBA Testimony: Draft UGR and Sherwood West UGB Request
Attachments: HBA Testimony, 2024 UGR and Sherwood West Expansion Request (8-22-2024).pdf

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Good afternoon Metro leaders!

Please find attached to this email the Home Building Association of Greater Portland's testimony for the 2024 Urban Growth Report and the Sherwood West Expansion Request. If you have any questions, please feel free to reach out directly by phone at [redacted]

Thank you so much.
Preston

Preston Korst
Director of Policy and Government Affairs
Home Building Association of Greater Portland
email: [redacted]
[redacted]

Miriam Hanes

From: Amelia Larkin <[redacted]>
Sent: Monday, August 5, 2024 4:54 PM
To: Metro 2040
Subject: [External sender]In Support of Sherwood West Expansion Plan

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Dear Metro Council,

I am writing in my support of the City of Sherwoods West Expansion Plan. Like many towns and cities Sherwood is experiencing a housing shortage, unlike many others Sherwood is uniquely situated to provide planned growth that will benefit the current and future residents of Sherwood. The community engagement and dedication of the local councils and committees ensures that the rich history and appeal of Sherwood is not lost to growth but rather enhanced and capitalized upon in a way that creates everlasting ties among residents new and old alike.

The passing of the West expansion is important because it satisfies all needs in protecting the land while providing opportunities and growth in a way that brings and keeps the best of Sherwood. True progress comes from building on the past with an eye to the future; holding tight to what once was will kill any economic and social prosperity that Sherwood is poised to take. It is up to us as stewards of the town we love to pass the expansion plan and do our best for future generations.

Sherwood is growing, whether people want it to or not but we have a chance to guide that growth in a way that benefits all. Please think of all residents when choosing to support and pass this plan and not only the few with the most.

Thank you,
Amelia Larkin

Miriam Hanes

From: Greg Manning <[redacted]>
Sent: Tuesday, July 30, 2024 3:04 PM
To: Metro 2040
Subject: [External sender]2024 Urban Growth Report Comment

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Dear Metro Council and Staff:

I urge you to support Sherwood's current request for a growth boundary expansion, having spoken with Sherwood officials and reviewed their conceptual planning for Sherwood West.

The lack of large employment sites is hampering our region's economic growth. The Portland MSA in recent months has posted the largest year-over-year job losses out of all 50 of the country's largest MSAs (nearly all metro areas gained jobs over this period). Sherwood will help provide those needed employment sites.

A wavering employment market also will worsen the housing affordability crisis we face in this region. The limited supply of land for residential development is another crucial affordability factor, by limiting new housing creation. Residential land availability and housing production were a focus of the last state legislative session due to widespead voter frustration over housing affordability in our region.

My experience as a development finance consultant, after many years of financing construction with area banks, has made clear to me the many problems that our limited land supply has caused.

Please consider the legislature's lead and support Sherwood's expansion effort.

Thank you for your consideration.

Greg Manning
[redacted]
Portland, OR 97219
[redacted]

Miriam Hanes

From: Connor Ayers
Sent: Tuesday, July 23, 2024 1:24 PM
To: Metro 2040; Georgia Langer
Cc: Ted Reid; Molly Cooney-Mesker; Laura Combs
Subject: RE: for council - FW: Draft 2024 Urban Growth Report - Public Comments - My Client David Marks

Thanks Miriam, I've shared this with the council.

Connor Ayers (he/they)
Legislative and Engagement Coordinator

Metro Council Office
600 NE Grand Avenue
Portland, OR 97232-2736
[redacted]
www.oregonmetro.gov

From: Metro 2040 <[redacted]>
Sent: Tuesday, July 23, 2024 1:12 PM
To: Connor Ayers <[redacted]>; Georgia Langer <[redacted]>
Cc: Ted Reid <[redacted]>; Molly Cooney-Mesker <[redacted]>; Laura Combs [redacted]
Subject: for council - FW: Draft 2024 Urban Growth Report - Public Comments - My Client David Marks

Hey team,

Some public comments re: UGR for council. I will send them confirmation of receipt.

Miriam Hanes | Metro | Program Assistant - Urban Policy & Development
My gender pronouns: she, they | Schedule: 8:30 a.m. to 5:00 p.m. Monday to Friday

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From: Mike Connors <[redacted]>
Sent: Tuesday, July 23, 2024 11:54 AM
To: Metro 2040 <[redacted]>
Subject: [External sender]Draft 2024 Urban Growth Report - Public Comments - My Client David Marks

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Urban Growth Management Team,

This firm represents David Marks, who owns property in the Stafford area that is part of Metro's urban reserves area. Mr. Marks is submitting the attached comments on Metro's draft 2024 Urban Growth Report for the Metro Council's consideration.

Please confirm receipt of our letter and let us know if you have any questions. Thanks, Mike

E. Michael Connors
Partner

Hathaway Larson LLP
[redacted]
Portland, OR 97209
[redacted]

Named as one of "America's Leading Lawyers for Business" (Oregon) by *Chambers USA* in Real Estate: Zoning/Land Use (2009-2024)
Selected to "Oregon Super Lawyers" in Land Use/Zoning (2015-2024)
Selected to "Best Lawyers in America" in Land Use/Zoning Law



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Miriam Hanes

From: Mike Connors <[redacted]>
Sent: Tuesday, July 23, 2024 11:54 AM
To: Metro 2040
Subject: [External sender]Draft 2024 Urban Growth Report - Public Comments - My Client David Marks
Attachments: Metro Urban Growth Report 2024 Ltr (David Marks).pdf

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Urban Growth Management Team,

This firm represents David Marks, who owns property in the Stafford area that is part of Metro's urban reserves area. Mr. Marks is submitting the attached comments on Metro's draft 2024 Urban Growth Report for the Metro Council's consideration.

Please confirm receipt of our letter and let us know if you have any questions. Thanks, Mike

E. Michael Connors
Partner

Hathaway Larson LLP
[redacted]

Named as one of "America's Leading Lawyers for Business" (Oregon)
by *Chambers USA* in Real Estate: Zoning/Land Use (2009-2024)
Selected to "Oregon Super Lawyers" in Land Use/Zoning (2015-2024)
Selected to "Best Lawyers in America" in Land Use/Zoning Law

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HATHAWAY LARSON
Koback · Connors · Heth

July 23, 2024

VIA EMAIL ([redacted]

Metro Council
Attn. Urban Growth Management Team
Metro Regional Center
600 NE Grand Ave.
Portland OR 97232

Re: Draft 2024 Urban Growth Report
Public Comments
My Client: David Marks

Dear President Peterson & Councilors:

This firm represents David Marks, who owns property in the Stafford area that is part of Metro's urban reserves area (the "Stafford Area"). Mr. Marks is submitting these comments on Metro's draft 2024 Urban Growth Report (the "Draft 2024 Report") for the Metro Council's consideration. As explained below, the Metro Council should reject the Draft 2024 Report because it is inconsistent with Goal 14, the implementing statutes and administrative rules, and the Court of Appeals' recent decision in *Marks v. LCDC*, 327 Or App 708, 536 P3d 995 (2023) ("*Marks*").

A. Introduction

In 2020, Mr. Marks filed a petition for enforcement with the Land Conservation and Development Commission ("LCDC") seeking to nullify and/or modify the five and three-party intergovernmental agreements ("IGAs") between Metro, Clackamas County, and the Cities of Lake Oswego, West Linn and Tualatin (the "Cities") that controls the future development of Stafford Area. Mr. Marks filed the petition for enforcement because Metro abdicated its regional planning authority over the Stafford Area by granting the Cities complete control over the timing of the expansion of the Urban Growth Boundary (the "UGB") into this area. Given the Cities' decades-long opposition to the urbanization of the Stafford Area, the IGAs will obstruct the State and regional efforts to increase the housing supply and address the regional housing crises.

In 2022, the Oregon Court of Appeals reversed LCDC and remanded the petition for enforcement matter to require LCDC to determine if the IGAs violate the regional framework plan and implementing goals, statutes and administrative rules. *Marks*, 327 Or App at 738. Although the

E. Michael Connors
[redacted]
Portland, OR 97209
[redacted]

Court did not resolve the merits of the petition for enforcement, the Court reiterated prior caselaw recognizing Metro's responsibility to implement a regional strategy for the metropolitan UGB as opposed to an ad hoc approach led by the metropolitan cities. The Court stated that Goal 14 and the implementing statutes and administrative rules require Metro to determine the 20-year regional housing needs and identify the best location to expand the UGB to satisfy those housing needs, not the metropolitan cities.

The Draft 2024 Report is yet another instance of Metro abdicated its regional planning authority and granting the metropolitan cities control over the timing and location of the UGB expansion. Instead of Metro determining the 20-year housing needs for the region and evaluating the urban reserve locations suited to accommodate those needs, the Draft 2024 Report confers that authority to the metropolitan cities. Metro is restricting its growth analysis to the City of Sherwood's limited proposal solely because Sherwood is the only city that requested a UGB expansion. The Draft 2024 Report takes this limited approach even though the 20-year housing needs analysis identified a need for significantly more housing units than Sherwood is proposing. This ad hoc, bottom-up type of approach to the Metro regional UGB is the opposite of what the Oregon legislature intended and is inconsistent with Goal 14 and the recent *Marks* decision.

B. Metro is required to determine the need and location for UGB expansions consistent with Goal 14 and the implementing statutes and administrative rules.

Metro is responsible for coordinating land use planning in the tri-county region consisting of Clackamas, Multnomah and Washington County. ORS 195.025; ORS 268.380(1)(c); ORS 268.385. One of Metro's primary responsibilities is the adoption and management of the regional UGB to ensure that the metropolitan regional housing and employment needs can be met. ORS 268.380-268.390; *Marks*, 327 Or App at 712-13; *Sensible Transportation v. Metro. Service Dist.*, 100 Or App 564, 567, 787 P2d 498, *rev. den.*, 310 Or. 70, 792 P2d 104 (1990). The Court of Appeals has repeatedly stated that in assigning Metro the responsibility for justifying, adopting, and securing acknowledgment of the metropolitan area UGB, the Oregon Legislative Assembly "presumably determined adoption and administration of the metropolitan area UGB required Metro's unique regional perspective, rather than leaving adoption and administration of the UGB to the large number of cities and counties making up the metropolitan area." *Marks*, 327 Or App at 712-713; *Sensible Transportation*, 100 Or App at 567. (Emphasis added).

As part of its UGB-related responsibilities, Metro is required to conduct a review of the metropolitan area UGB every six years to ensure that it continues to maintain a 20-year supply of urbanizable land within the UGB. ORS 197.299. With respect to housing, Metro must demonstrate that its regional plan has "sufficient buildable lands within the urban growth boundary . . . to accommodate estimated housing needs for 20 years." ORS 197.296(2). Metro's needs analysis must be supported by substantial evidence. *City of West Linn v. LCDC*, 201 Or App 419, 440, 119 P3d 285 (2005). If Metro determines that the land supply is inadequate, it must expand the UGB or take other measures to ensure that the identified need can be accommodated. ORS 197.296(6); ORS 197.299(2); *Marks*, 327 Or App at 713.

In considering where to expand the UGB, Metro's analysis must comply with Goal 14, which includes four "boundary location" factors that Metro must consider when determining which urban

reserve land to add to the UGB. Goal 14; *Marks*, 327 Or App at 713. The four boundary location factors are "(1) [e]fficient accommodation of identified land needs; (2) [o]rderly and economic provision of public facilities and services; (3) [c]omparative environmental, energy, economic and social consequences; and (4) [c]ompatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB." *Id.* A decision to add land to the UGB must compare alternative areas based on a balancing of all these factors, rather than reliance on any one factor. *Citizens Against Irresponsible Growth v. Metro*, 179 Or App 12, 17, 38 P3d 956 (2002); *1000 Friends of Or. v. Metro*, 174 Or App 406, 409–410, 26 P3d 151 (2001); *D.S. Parklane Dev., Inc. v. Metro*, 165 Or App 1, 25, 994 P2d 1205 (2000).

C. The Draft 2024 Report is inconsistent with Goal 14, the implementing statutes and administrative rules, and *Marks*.

The Draft 2024 Report has multiple problems that should concern the Metro Council. The Draft 2024 Report does not explain how Metro is going to satisfy the housing needs over the 20-year period and does not even acknowledge the Goal 14 boundary location requirements or attempt to comply with these requirements. The Draft 2024 Report appears to be designed primarily to justify Metro's policy of limiting its consideration of UGB expansion areas to Sherwood's request since it was the only city to request an expansion. As explained below, the Draft 2024 Report is inconsistent with Goal 14, the implementing statutes and administrative rules, and *Marks* in several respects.

The Draft 2024 Report does not contain any meaningful recommendations or indication of what Metro's chief operating officer and staff may ultimately recommend the Metro Council adopt for its final decision. While we understand this public comment period is designed in part to provide Metro's chief operating officer and staff additional public input to help inform their recommendations, the Draft 2024 Report is so general and ambiguous that it makes it extremely difficult to provide meaningful input and comments. The Draft 2024 Report contains a wide variety of scenarios that lead to very different results, but it lacks any indication of which scenarios are more likely or how the Metro Council should factor in these varying scenarios to its decision. If Metro is truly seeking meaningful public input, requesting that the public comment on such an amorphous and non-committal report is not very helpful or productive.

The Draft 2024 Report failed to acknowledge there is a need for significant new housing in the Metro UGB to satisfy the 20-year housing needs of the region. Currently, there is an existing need for 23,700 additional housing units in the Metro region based on Econorthwest's Existing Housing Needs Report. Draft 2024 Report, Appendix 8A. The Draft 2024 Report notes there is also a need for a significant number of new housing units to address the future growth needs, ranging from 179,500 units under the high growth model, 149,500 under the baseline growth model and 119,600 under the low growth model. In total, this data demonstrates that there is a need for 143,300 to 203,200 new housing units in the Metro UGB to satisfy the 20-year needs of the region.

Instead of acknowledging this need for a significant amount of new housing units to satisfy the 20-year needs of the region, the Draft 2024 Report suggests that the Metro Council has wide "latitude to determine <u>whether</u> additional housing capacity is needed to accommodate potential household growth." Draft 2024 Report, p.37. (Emphasis added). The sole basis for this alleged latitude is the

"uncertainty" in predicting future trends. Draft 2024 Report, p.37-38. The uncertainty in predicting future trends cannot be used as a basis for ignoring the actual data and analysis because Metro's entire process of evaluating the needs of the region for the next 20 years is inherently uncertain. If the mere uncertainty in predicting future trends was sufficient to override the actual data and analysis, there would be no reason to do a detailed analysis of the housing needs in the first place. The Draft 2024 Report appears to be an outcome driven analysis designed to grant the Metro Council maximum latitude and discretion to decide whatever it wants, rather than an evidentiary based decision. Metro's needs analysis must be supported by substantial evidence, not an outcome driven approach designed to provide maximum decision-making discretion. *City of West Linn v. LCDC,* 201 Or App at 440.

The Draft 2024 Report failed to acknowledge that the Sherwood West urban reserve area proposal, the only UGB expansion option identified in the report, is woefully insufficient to satisfy the 20-year housing needs of the region. The Sherwood West proposal will only provide 3,120 to 5,580 new housing units, which will barely put a dent in the 143,300 to 203,200 new housing units needed to satisfy the 20-year needs of the region. By limiting its consideration of UGB expansion options to the Sherwood West proposal, Metro has made it impossible to satisfy the 20-year housing needs of the region.

The Draft 2024 Report does not comply with the Goal 14 boundary location factors. The report doesn't even mention the Goal 14 boundary location factors, let alone address them. Nor could the Draft 2024 Report comply with the Goal 14 boundary location factors because Metro refused to consider any urban reserve areas unless a city proposes an UGB expansion and provides a concept plan. Given that Sherwood was the only city to submit a UGB expansion proposal, Metro's policy of requiring a concept plan as a prerequisite to UGB expansion precludes consideration of any other areas in the Metro region. As a result, the Draft 2024 Report clearly does not identify where the additional housing is most needed as required by Goal 14.

Metro's "policy" of requiring a concept plan from the city before it will consider adding urban reserve land to the UGB is itself inconsistent with Goal 14 and the implementing statutes and administrative rules. Metro's decision to add land to the UGB must compare alternative areas based on a balancing of all the Goal 14 boundary line factors and cannot rely solely on any one factor. *Citizens Against Irresponsible Growth v. Metro*, 179 Or App at 17; *1000 Friends of Or. v. Metro*, 174 Or App at 409–410; *D.S. Parklane Dev., Inc. v. Metro*, 165 Or App at 25. Moreover, Goal 14, the statutes and the administrative rules do not even reference a "concept plan," and they certainly do not require a concept plan as a prerequisite to inclusion in the UGB. Metro's policy for requiring a concept plan as a prerequisite for inclusion in the UGB is based solely on the Metro Code ("MC"), but the Metro Code cannot override the requirements under Goal 14, the statutes and the administrative rules.

As the Court acknowledged in *Marks*, LCDC and the Department of Land Conservation and Development ("DLCD") have both determined that Metro cannot avoid the Goal 14 requirement to study all urban reserve lands for inclusion in the UGB based solely on the lack of a concept plan. *Marks*, 327 Or App at 715-716. If Metro identifies a need for additional land in the UGB to accommodate the regional need for housing and employment, Metro must determine which land to add by evaluating alternative urban growth boundary locations consistent with the boundary

location factors of Goal 14. OAR 660-024-0060(1); *Marks*, 327 Or App at 725. Metro must consider and balance the boundary location factors of Goal 14 for all of the urban reserves areas and determine the UGB boundary location based on all the relevant factors. OAR 660-024-0060(3). Metro cannot use the concept plan requirement in MC 3.07.1110 to avoid the Goal 14 requirement that it study all urban reserve lands for possible inclusion in the Metro UGB. *Marks*, 327 Or App at 737.

Moreover, even the Metro Code does not support such a carte blanche policy. MC 3.07.1425 sets forth "factors and criteria for amendment of the UGB," only one of which includes "whether the area has been concept planned." MC 3.07.1425(c) & (d). MC 3.07.1110(a) provides that concept plans are generally required before land is added to the UGB, but it does not limit Metro's six-year review of the UGB to areas that have a concept plan. Additionally, MC 3.07.1110(e) provides an exception to the general requirement that concept planning occur before land is added to the UGB.

Metro's policy is not only inconsistent with State law, but it based on a unique situation that should not be driving Metro's approach to UGB expansions. Metro added the concept planning requirement due to the UGB expansion in 2002, which included 12,000 acres in the Damascus area that largely failed to urbanize after the decades long legal battle that ultimately led to the City of Damascus disincorporating. But that situation was highly unusual and the reasons why that area has not been urbanized are unique to that situation. The local residents' unusual decision to incorporate Damascus in 2004 to control the development of this urban area, and the subsequent disincorporation after years of political infighting and litigation, that was the reason this area did not get developed. It was certainly not the mere lack of a concept plan.

Had Metro considered other urban reserve areas for possible inclusion in the UGB as required by Goal 14, it would conclude that there are other areas that clearly have a need for additional urban lands. As an example, the City of Tualatin's 2019 Housing Needs Analysis concluded there is an existing lack of affordable housing and lack of capacity to accommodate certain other housing types. Tualatin is unable to accommodate these housing needs without a UGB expansion. Had Metro considered Tualatin's Housing Needs Analysis, it clearly would have concluded there is a specific need for additional urban lands in this location. By refusing to even consider other cities housing needs analysis or similar information, Metro is disregarding its responsibility to determine where the best locations for expanding the UGB in compliance with Goal 14.

D. Conclusion.

The Draft 2024 Report and Metro's whole approach to this six-year UGB expansion review has turned the process on its head. The Oregon legislature granted Metro the authority to administer the regional UGB because it "required Metro's unique regional perspective, rather than leaving adoption and administration of the UGB to the large number of cities and counties making up the metropolitan area." *Marks*, 327 Or App at 712-713. Goal 14 and the implementing statutes and administrative rules were designed to require Metro to determine the housing and employment needs in the region and the locations where those needs can be best served.

Metro's current approach is the opposite of that legislative directive and process. Now the cities dictate when and where the regional UGB expansions will occur. Even when the city proposals are

insufficient to satisfy the regional housing and employment needs, the Draft 2024 Report makes it clear that Metro will either ignore those needs or rely on the inherent uncertainty in predicting future trends as a basis for justifying a smaller UGB expansion. Metro is effectively abdicating its authority over UGB expansions to the cities in contravention of the legislature's intent.

Not only is Metro's approach to this UGB expansion process inconsistent with Goal 14 and the implementing statutes and administrative rules, but it will exacerbate the current housing crisis in the Metro region. As recognized in the Draft 2024 Report, the Metro region currently does not have a sufficient housing supply and many residents are priced out of the market. That trend will only worsen over time. Metro needs to provide leadership on this issue, comply with the required Goal 14 process and be willing to make the hard decisions necessary to address this difficult housing issue plaguing our region. The first step in doing so is to ensure the 2024 UGB expansion process follows the requirements of Goal 14 and the implementing statutes and administrative rules.

We appreciate your consideration of our comments and look forward to addressing this issue further with the Metro Council.

Very truly yours,

HATHAWAY LARSON LLP

/s/ E. Michael Connors

E. Michael Connors

EMC/ep

cc: David Marks

Miriam Hanes

From: Ted Reid
Sent: Friday, July 19, 2024 9:09 AM
To: Eric Rutledge; Eryn Kehe
Cc: Tim Rosener; Keith Mays; Miriam Hanes
Subject: RE: Sherwood West UGB Support

Hi Eric,
I'm forwarding this to Miriam who is maintaining the decision record.

Thanks,
Ted

From: Eric Rutledge <[redacted]
Sent: Friday, July 19, 2024 9:06 AM
To: Ted Reid <[redacted]; Eryn Kehe <[redacted]
Cc: Tim Rosener <[redacted]; Keith Mays <[redacted]
Subject: [External sender]Re: Sherwood West UGB Support

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Hi Ted and Eryn,

I talked with Diann this week and we weren't sure if this testimony needs to be resubmitted to be part of the UGB decision record?

There are a few other emails in support that came in before the UGR comment period formally opened.

Thank you!

Eric Rutledge
City of Sherwood
Community Development Director
[redacted]
Desk [redacted]
Work Cell [redacted]

From: Diann Matthews [redacted]
Sent: Tuesday, June 25, 2024 6:41 AM
To: [redacted] Tim Rosener [redacted]; Eric Rutledge <[redacted]; Keith Mays

[redacted]
Subject: Sherwood West UGB Support

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Dear Gerritt,

This is Diann Matthews. My sister, Marleen Mandel, and I own the property at 18550 SW Edy Road in Sherwood (approximately 60 acres at the southwest corner of Edy and Elwert Roads). We are writing to you **in support of the Urban Growth Boundary (UGB) expansion** request for Sherwood West.

Our family's roots run deep in Sherwood. Our father was raised on a farm directly across Elwert from ours, and the Mandel family has been in Sherwood for more than 100 years. The farm he grew up on is already in the UGB. It is the subdivision known as Mandel Farms and has nearly 90 homes. Our parents purchased our property in 1956 and we have continued to use it as a home and farm for nearly 70 years.

During our time here, we have seen many changes in the city during our time here, some good, some not so good. With the addition of the high school in Sherwood West, traffic and congestion have made it increasingly hard to maintain our property as a farm. I can attest that the City has attempted to meet the needs of the citizens and have a vision for the city that fits into the small community feel Sherwood has always had, but feel that now is the time for expansion.

In the past dozen years or so, I have been extensively involved in the Citizen's Advisory Committee. I sat on the citizens advisory committee in the first iteration back in 2012 and I have played an active supportive role in the current concept plan that just wrapped up prior to the City making an application this year to Metro. The city has spent a lot of thoughtful time making an appropriate plan to meet the City's current and future needs for housing, roads, infrastructure, schools, and parks.

Here are a few examples of the needs of the community and thus the reason for the ask from METRO for approximately 1300 acres: 1) lack for affordable housing in the area for all demographics, 2) job growth, which is a focus of the City Council and there is not any affordable housing for employees to live in the community, 3) more families increase school enrollment in the area and in the Sherwood High School which is located in the Sherwood West boundary, 4) the result of increased population will benefit the entire community in the tax base, 5) parks have been included into the plan to fit into the existing vision of the Sherwood community, 6) focus on sustainable employment beyond the existing service jobs, which will provide the community with a stronger revenue and services base, and lastly 7) Sherwood withdrew its request in 2018 for UGB expansion and the community has felt negative impact ever since.

There is a group called West of Sherwood Farm Alliance, existing of 2 wineries, Hawks View and Alloro, that are outside the growth boundary of Sherwood West and are encouraging folks to complain and cite reasons against Sherwood West UGB expansion request. Many of these folks have not been involved in the arduous process the city has gone through in the past 12 years which has resulted in the City's current request to Metro.

Thank you for your time and consideration in this important matter. Please know there are many of our neighbors in the Sherwood West Area who support the UGB expansion request and are hoping Metro will vote in support of the UGB expansion request of 1291 acres.

If you have any questions please feel free to reach out to me at either [redacted] or at [redacted].

Sincerely,

Diann Matthews and Marleen Mandel
--

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Miriam Hanes

From: [redacted]
Sent: Thursday, August 15, 2024 5:14 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]Objection to Urban Growth Boundary Expansion

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To whom it may concern,

As a resident and taxpayer of Sherwood for the past 23 years, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Kelly Melillo

Kelly Melillo
Sent from my iPhone

Miriam Hanes

From: Meerta Meyer <[redacted]>
Sent: Friday, August 16, 2024 1:19 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]In Opposition to Sherwood West Concept Plan

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The Sherwood West Concept plan will increase traffic and congestion (causing significant delays for day to day travel *and* first responders), create more and more of a burden on our school system (larger classroom sizes, teacher impacts, and more), increase the need for infrastructure improvements (causing a greater tax burden on Sherwood), and generally, is **NOT** what Sherwood residents want.

As anticipated, we see negative impacts of the Brookman development (*which was voted down by the citizens of Sherwood THREE times yet pushed through anyway*). We were promised better walkability and a thoughtful new traffic pattern - most definitely, not the case. The surrounding area has become a 'freeway' and/or cut through for more and more traffic without sidewalks and is unsafe for anyone to walk, run, or play (which was one of its' very selling points).

While we appreciate the need for development and perhaps even the intention to grow thoughtfully - this plan doesn't meet the needs of the existing community. Please pause and get it right.

Meerta Meyer
[redacted]

Urban Growth Management Team
Metro
600 NE Grand Ave.
Portland, OR 97232

8/13/2024

Metro Urban Growth Management Team,

The City of Gresham appreciates the work of Metro staff and consultants over the past year to compile the draft Urban Growth Report. At this time Gresham would like to provide some comments regarding the draft report:

- A topic throughout the region this cycle has been the feasibility of industrially zoned lands. Gresham staff were informed that the Metro process considered slope as part of Sherwood's expansion proposal, which is commendable. Unfortunately, slope isn't reflected in the inventory of industrial land supply in a way that accurately reflects developable acreage. Large-lot development is widely seen as infeasible if slopes exceed 5%. Several of the region's large-lot tier 3 sites are within Gresham. One is an active gravel pit, and the others are within the Springwater area with slopes in excess of 7%.

- The UGR will be viewed statewide and can have far-reaching implications. We know funding is critical for tier 3 sites, especially large-lot sites to become shovel-ready. We need to ensure we get the industrial land supply right to effectively advocate for funding for these sites.

- The draft UGR discusses potential conditions that could be placed on a Sherwood expansion related to housing that could require a certain housing mix. Gresham would caution against overly prescriptive conditions of approval with the impending Oregon Housing Needs Analysis. It could be more appropriate to allow the OHNA housing needs allocation and Sherwood's translation of it into housing types, characteristics, and locations to help Sherwood formulate zoning and incentives for housing types within the expansion area.

We appreciate your consideration of Gresham's comments.

Sincerely,

Ashley Miller

E. Fitz

Ashley Miller
Community Development Director

Erika Fitzgerald
Interim Economic Development Director

Miriam Hanes

From: Jamie Monahan [redacted]
Sent: Thursday, August 15, 2024 10:35 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]2024 Sherwood West Concept Plan

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Jamie Monahan

Sent from my iPhone

Miriam Hanes

From: Julie Nader [redacted]
Sent: Wednesday, August 21, 2024 2:44 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]Urban Growth Boundary

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Good Afternoon!

I am concerned about expanding the Urban Growth Boundary when there is space for more housing right now. I own a home in Sherwood (and thus pay taxes) and want you to reject the Expansion of the West Urban Growth Boundary by 1,291 acres!

Thanks for hearing my concern,
Julie

Julie Nader

Miriam Hanes

From: Eric Rutledge [redacted]
Sent: Friday, July 19, 2024 3:10 PM
To: Miriam Hanes
Cc: Ted Reid; Eryn Kehe
Subject: [External sender]FW: UGB-Expansion
Attachments: Sherwood UGB-#2.pdf

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Hi Miriam – some testimony for the urban growth decision. It looks like the Metro Council was copied but not staff. Wanted to make sure you received this.

Thanks,

Eric Rutledge
City of Sherwood
Community Development Director
[redacted]

From: LouAnn Nance <[redacted]>
Sent: Sunday, June 30, 2024 2:20 PM
To: [redacted]
Cc: [redacted] Eric Rutledge <[redacted]>; [redacted]; Keith Mays [redacted]
Subject: UGB-Expansion

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Sent from my iPad

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June 30, 2024

Gerritt Rosenthal
District 3 Councilor Metro
[redacted]

CC:
Marisa Madrigal
Chief Operating Officer
[redacted]
Eric Rutledge
Community Development Director
[redacted]
Lynn Peterson
President, Metro
[redacted]
Mary Nolan
District 5 Councilor Metro
[redacted]
Tim Rosener
Mayor, City of Sherwood
[redacted]
Keith Mays
Councilor, City of Sherwood
[redacted]

RE: UGB Expansion
Dear Gerritt:

My name is Lou Ann Nance, and my interest in the Sherwood UGB is based upon my family's property within the Sherwood West Neighborhood, which they have owned for nearly 40 years.

Our family has huge sentimental interest in the Sherwood Area, and desire for thoughtful development of the area that support s efficient use of the land that creates new jobs and affordable housing. It will also be necessary to create a tax base that sustains the infrastructure, and the new $247 million-dollar high school.

Your foresight into a healthy UGB Plan will ensure the prosperity of the City of Sherwood for many years to come. Thank You for your time and considerations in this important matter.

Sincerely

Lou Ann Ottoman Nance

August 15, 2024

Metro Council Chair Peterson and Members of the Metro Council,

Thank you for the opportunity to provide testimony on the draft Urban Growth Report (UGR) released in July. We appreciate the work and effort staff have dedicated to the implementation of the Urban Growth Report process. We are grateful for the opportunity to have representation on the Stakeholder Roundtable.

The Washington County Chamber of Commerce represents a broad spectrum of businesses and community stakeholders who are deeply invested in the future growth and prosperity of our region. After thorough discussion with our members, we have identified several areas of concern in the UGR as currently drafted. We respectfully submit the following feedback for your consideration.

1. Definition and Classification of "Buildable Land"

One of our primary concerns revolves around the definition and classification of "buildable land," particularly in the context of industrial land supply versus housing capacity. The current draft report appears to contain significant discrepancies between what is considered "developable" land and what Metro is counting as a surplus of buildable lands.

Analysis suggests there is an oversampling of small parcels, particularly those under 10 acres, which are generally not attractive to industrial or commercial investors. Additionally, we have identified issues with several large parcels, including eight 50-acre sites that appear to be either defunct rock quarries or sites with serious constraints, making them effectively undevelopable.

We urge Metro to revisit the criteria used to classify industrial land and to apply more stringent layers of analysis to ensure that the data reflects the true potential for industrial development. It is crucial that Metro's data accurately represents the realities on the ground to avoid misguiding policy decisions based on an overestimated supply of viable industrial land. If the criteria are embedded in State Land Use laws or constraints, we believe it is incumbent upon Metro to actively seek changes to State Laws or Statute.

2. Employment Lands and Viability

Regarding employment lands, we recommend that Metro Council discount approximately 1,300 acres of land with a slope grade above 7%, as this exceeds the industry standard for commercial and industrial development. We also ask that the Council consider the fact that the average lot size for employment lands is currently 3.8 acres, with a median site size of just 1.7 acres. These dimensions are often insufficient for the needs of modern commercial and industrial developments.

3. Senate Bill 4 Super-Siting and Employment Land Expansion

During the 2023 Legislative Session, Senate Bill 4 gave the Governor super-siting authority under the Oregon CHIPS legislation (SB4) passed last session. Should the Governor choose to exercise this authority, we strongly urge the Metro Council to view this as an additive measure rather than a replacement for any employment land expansion decisions as it was contemplated by Legislators. The super-siting authority is a valuable tool for specific projects but should not substitute the broader need for increasing our employment land base.

4. Housing Capacity and the Need for Realistic Projections

The draft UGR significantly underestimates the region's housing needs. According to a report by ECOnorthwest, the Portland Metro Region is already facing a shortage of 59,488 homes, in addition to 10,683 homes needed for houseless populations. Furthermore, the report projects that the region will need to produce 294,853 new housing units over the next 20 years—far exceeding Metro's calculated range of 143,300 to 203,200 units.

We strongly recommend that Metro Council incorporate this supplementary data into the UGR and consider its implications, particularly in the context of Sherwood's expansion plans. The current projections in the UGR do not align with the on-the-ground realities of our housing market. We also urge the Council to reject the limiting housing development scenarios presented on page 38 of the report. Instead, Metro should adopt a policy framework that acknowledges both the low capacity for housing development within the Urban Growth Boundary (UGB) and the urgent, high need for new housing production.

The current scenario, which suggests a surplus of 9,050 units, is misleading and risks leaving our region severely underprepared for future housing demands. The reality points to a potential deficit of 84,000 housing units inside the UGB, a gap that Metro must address to avoid exacerbating the existing housing crisis. We believe that planning for adequate housing will help to mitigate the escalating costs of housing.

5. Planning for Growth, Not Decline

Finally, we believe that it is far wiser to plan for growth and be overprepared than to anticipate decline and risk underproducing housing and jobs. The current UGR seems to prophesy a conservative growth outlook, which could lead to economic stagnation and increased pressure on housing markets. We urge Metro Council to adopt the "High" Population growth forecast in the UGR to provide greater flexibility to local jurisdictions in meeting their communities' needs.

This recommendation is not just a matter of optimism but of prudent public policy. By planning for high growth, Metro can ensure that our region is prepared to meet the demands of a growing population, thereby avoiding future crises related to housing shortages and economic underdevelopment.

6. Washington County Chamber Support for Sherwood's Expansion Application

In addition to the concerns outlined above, the Washington County Chamber of Commerce fully supports the City of Sherwood's expansion application as presented. We believe that the Sherwood West North District Mixed Employment Area (MEA) is critical for addressing the region's growing need for industrial land and housing. The inclusion of this area within the UGB will help meet the demands of a

robust and expanding industrial market, provide opportunities for job creation, and contribute to the overall economic growth of the region.

It is essential that the final decisions reflect the true needs and potential of our community, and we remain committed to ensuring that the voices of our members and stakeholders are heard throughout this process.

We appreciate the significant amount of work that Metro has put into the Urban Growth Report, but we believe that adjustments are necessary to reflect the true needs of our region. We urge the Metro Council to take these concerns into account and to revise the UGR accordingly. The Washington County Chamber of Commerce stands ready to collaborate with Metro and other stakeholders to ensure that our region's growth is sustainable, equitable, and prosperous.

Thank you for your consideration.

Sincerely,



Deanna Palm
President/CEO

Miriam Hanes

From: Deanna Palm <[redacted]>
Sent: Friday, August 16, 2024 5:34 PM
To: Metro 2040
Subject: [External sender]Washington County Chamber Testimony on Draft 2024 Urban Growth Report
Attachments: Testimony for Metro Council Re Draft Urban Growth Report.pdf

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Please find attached testimony from the Washington County Chamber of Commerce in reference to Metro's 2024 Draft Urban Growth Report. Please feel free to reach out to me if you have any questions or need any additional clarification on our comments. Thank you!

Deanna Palm
She, her, hers
President/CEO

WASHINGTON COUNTY CHAMBER of COMMERCE

Washington County Chamber of Commerce
Phone: [redacted]
Email: [redacted]
www.washingtoncountychamberor.com
[redacted] | Hillsboro, OR 97124

Miriam Hanes

From: [redacted]
Sent: Friday, July 19, 2024 8:46 AM
To: Metro 2040
Subject: [External sender]Please Vote NO on the Sherwood Urban Growth request

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Dear METRO Council,

Say NO to the Sherwood request to expand the UGB. Although METRO has previously said YES to all city proposed UGB expansion requests, you should say NO to the Sherwood request. Please stick with your charter! From your website "...Portland area leaders saw an unfulfilled need to provide regionwide planning and coordination to manage growth, infrastructure and development issues that cross jurisdictional boundaries. They also saw a need to protect farms and forests from urbanization and to provide services that are regional in nature."

The Sherwood proposal uses inaccurate population growth data. Read and listen to your own Expert Analysis reports. The minimal population growth will come only from net migration. The state is also looking at alternative scenarios. Read the "Zero Migration" report from the Oregon Office of Economic Analysis at Report: Zero Migration, a Demographic Alternative Scenario | Oregon Office of Economic Analysis (oregoneconomicanalysis.com)

Job estimates - simply a Field of Dreams estimate, if you build it they will come. But, they will not come from out of state, they will come from other parts of Metro. Everyone hopes they will get a microprocessor factory, but another Amazon warehouse employing robots is more likely.

New Housing – politically correct position, but simply wrong. This will not drive housing prices down. Does anyone really believe that this growth will help solve the homeless problem?

Infrastructure – We are taxed enough already, please STOP! The proposed roadway improvements are not nearly enough to move the increased amount of traffic.

This UGB expansion is NOT needed, it is wanted. It is backed primarily by the city government and developers. Why they support this UGB expansion is unclear, but there are clues when you look at the list of Supporters provided by Sherwood in the proposal, and by this statement made by Mayor Rosener at the last MPAC meeting. He said something to the effect... "We have speculators who have bought up the land or have options on those lands, to do land assembly. There is some grease on the wheels there."

Please stop the sprawl and protect farms! Support infill. Support real estate re-development to address the housing. Support re-purposing of unused office space resulting from folks working from home.

Thank you for your consideration,

Jo and Alan Pearson
[redacted]
Sherwood, OR 97140

Miriam Hanes

From: [redacted]
Sent: Sunday, August 18, 2024 6:29 PM
To: Metro 2040; Marissa Madrigal; Lynn Peterson; Gerritt Rosenthal
Cc: Sherwood Farm Alliance; [redacted] Al Pearson
Subject: [External sender]Please REJECT Sherwood's UGB Growth Request

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

To whom it may concern,

We strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. METRO needs to execute on one of their primary purposes, and stop unnecessary urban sprawl.

NOT NEEDED
In 2022 Metro projected Sherwood would grow by a scant 3% over the coming decades. The Sherwood School District has forecasted enrollment for the new high school will begin to DECLINE in 2027. Sherwood has enough vacant land to accommodate new housing and jobs for years to come, when planned and developed wisely.

Metro's research concluded there is enough industrial land inside the existing Regional UGB for another 20 years. Metro's research on Residential land shows most land brought into the UGB in the last 20 years remains undeveloped.

FALSE PREMISES
Taxes will increase. I testified and asked for a Taxpayer Impact Statement, yet none is available to my knowledge. Residents should understand how Sherwood and its residents will pay for the new roads, sidewalks, water and sewer, and not just an "agreement" to figure it out later. Yes, the developers will pay for a portion of the initial infrastructure, but WE will be left with more financial obligations to pay for the operating and maintenance costs, even though we do NOT need the new land to keep pace with growth in Sherwood.

Trust in Leadership is rapidly eroding. Statements like "Developers and speculators have already bought land or rights...", "Wheels have been greased...", and then the Washington County testimony supporting Sherwood and stating something like "WE encourage METRO to adopt the high population estimate so they could get more funding..." This is astounding, but sadly not surprising, behind the scenes behavior.

NOT WANTED
84% of the people in Sherwood who participated in an online poll in 2021 OPPOSED the UGB expansion. If you actually read the verbatims in the Sherwood proposal, there is little support for this expansion by the residents.

We stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Alan and Jo Pearson

Miriam Hanes

From: Bridget Perkins [redacted]
Sent: Tuesday, August 20, 2024 8:29 PM
To: Metro 2040
Subject: [External sender]No to the boundary expansion

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres.

This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes.

I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Bridget Perkins

Miriam Hanes

From: Stu Peterson <[redacted]>
Sent: Sunday, July 21, 2024 8:19 PM
To: Metro 2040
Subject: [External sender]RE: Sherwood West Concept plan

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In reference to the above mentioned urban expansion I want to express my support for this planned expansion. There is an acute shortage of all types of developable land in the tri county area, but in particular Industrial property is lacking. AS a commercial real estate broker of 42 years focused in the Metro region but SW in particular, I have represented many of this submarkets largest employers. Lately I have seen a trend by some to relocate to other areas of the state, or out of state due to the lack of available land and/or facilities to house expansion. The housing shortage in the region is mentioned often in the press and is a focus of the state leadership, but the shortage of industrial land is more acute in our region is more acute, and in my opinion, more important. Our region cannot prosper without our industrial employers being retained and the shortage of industrial property in the metro region is causing out migration of these stalwarts of our business community.

Stu Peterson SIOR
Macadam Forbes
[redacted]
Lake Oswego OR 97035
[redacted]
Initial Agency Disclosure Packet

JOHN A. RANKIN, LLC.
Attorney/Consultant
[redacted]
Lake Oswego, Oregon 97035

Mailing Address:
[redacted]
Murrieta, California 92562
[redacted]
email: [redacted]

July 30, 2024

VIA EMAIL ONLY

Metro Council
c/o Ms. Marissa Madrigal
Chief Operating Officer
Metro Services District
600 NE Grand Ave
Portland, OR 97232
[redacted]

Re: Letter of Support For Metro Council's 2024 UGB Decision For Inclusion of the Sherwood West Concept Plan Area.

Dear Councilors Peterson, Simpson, Lewis, Rosenthal, Gonzalez, Nolan, and Hwang:

Please accept this letter as our second and supplemental official Letter of Support on behalf of those Sherwood West property owners, whom we currently represent and have represented in the past from the beginning of the Sherwood West planning process nearly ten years ago, requesting that your December 5, 2024 final decision approve the City of Sherwood's "Ask" to expand the Metro UGB to include the entire Sherwood West 1,291-acre Planning Area into the current Metro UGB boundary.

We respectfully submit this testimony on behalf of our current and former mostly very long term generational Sherwood farm and community family clients, Elanna Schlichting, manager of the Schlichting Family Century Farm LLC (owners of approximately 38 acres), Nancy Perkins and Kevin Sabbe, Trustees of the Sabbe Family Trust (owners of approximately 32 acres), and the Glen T. Wetzel Family (owners of approximately 0.46 acres), all located in the North District, as well as the Mandel Farms, LLC (owner of approximately 57 acres) and Prodigal Son LLC. (owner of approximately 20 acres) both located in the West District, all of

which represents approximately 147 acres or nearly 12% of total land located within Sherwood West.

From years of experience representing a number of Oregon cities in various capacities and being intimately involved in comprehensive and concept plan since the 1970's and 1980's, and based on recent review of Metro's Draft July 2024 Urban Growth Report ("UGR"), please see the following executive summary of our written and oral testimony to both the City of Sherwood over the years, our initial April 2024 letter to you, and our review of the UGR in light of recent promising trends on the horizon of our lives and our communities, locally and nationally, which ultimately argue in favor of and support for your affirmative decision to expand the Metro UGB to include the entire Sherwood West Concept Plan:

1. The City of Sherwood and the Sherwood Community has worked very hard for many years with the help of Metro Council Staff and thousands of hours of City and County officials and staffs, with the valuable input of countless community volunteers and consultants from the entire collection of interested parties and local and state agencies and the many vital NGOs, all of which have provided important and essential input to shape and create the unique Sherwood West Vision for the future of all of its existing and future residents and businesses.

2. Sherwood West is the first time the City and Community and all players has systematically and comprehensively supported and created a visionary UGB expansion of this scope, which will provide the road map forward beyond our current lifetimes.

3. Sherwood West is the first expansion request to incorporate many of the middle housing (and thus more affordable housing) options of the continuing local and statewide Smart Growth legacy.

4. Sherwood West:
    a. Protects and enhances the viable farm and forest lands surrounding Sherwood.
    b. Protects and enhances the existing special natural resources of the Area that are so important and beloved throughout our community and county and state.
    c. Encourages distinct and diverse middle housing types, in livable and walkable neighborhoods close to commercial areas as built environments centered around those existing natural resources.
    d. Helps address Sherwood's local housing crisis and particularly its need for affordable housing to meet its changing demographics.
    e. Provides a much-improved Jobs/Housing Balance centered in the North District Employment Area that will help ensure that Sherwood West's vision is economically sustainable into the future.
    f. Which Balance is specifically planned to attract advanced manufacturing and high-tech support services that by purposefully reducing the need for direct "major highway access" and reducing the number of trips and miles between home and work will further enhance Sherwood's collective goal to be as "carbon neutral" as possible.
    g. Provides affordable opportunities to more small women owned and BIPOC businesses in the North District and the planned commercial areas.

5. In recent "Ask" cycles, as Sherwood continued to refine its Sherwood West Plan, other communities within the Metro UGB and especially in the South and West Metro Areas

have been given significant UGB expansions into urban reserve areas which were comprehensively planned and are being and will be comprehensively developed for many years into the future. Sherwood needs and respectfully requests that same opportunity.

6. Nationally, despite what we thankfully are seeing "in the rear-view window":
    a. Inflation appears to be under control and been reduced significantly year over year confirming the "soft landing" we all hoped for, and
    b. The Federal Reserve is this week signally that its next interest rate reduction will occur in September 2024, as the recovery continues to trend upward.
    c. All of which will encourage a return to sustainable growth in all sectors and with Sherwood's current housing crisis and need for more employment land provides the support for your December decision to expand the UGB to include all of Sherwood West.

7. We continue to sincerely believe the best way to make certain a great Concept and Community Plan like Sherwood West truly succeeds is to make certain the entire Plan is fully implemented for the reasons given in our April 4, 2024 Letter of Support, including but not limited to:
    a. We need only look at the decades old and recent successful UGB expansions from Villebois in Wilsonville to River Terrace in Tigard and others in Hillsboro in West and Southwest Metro;
    b. Piecemeal or phased expansions always result in anomalies and subtle and not-so-subtle resulting amendments that blur a city's vision and frustrate the intended balancing of the complex inter-relationships of planning efforts and the natural and built environments; and
    c. The City and Community can then work on an "economies of scale" basis with all potential developers and affected agencies to ensure the City's Strategic Funding Program works most efficiently and effectively to realize the vision.

8. Sherwood has created a viable Sherwood West Final Infrastructure Strategy which will work to phase development and enhancement of the built and natural resources environments.

9. Significant interest in Sherwood West from quality members of the development community, both locally and nationally, has been generated, particularly in the industrial employment lands designated in the North Area in the last year, resulting our receipt of a purchase offer from a serious and respected national development company who has been active in the Portland Metro Area and Pacific Northwest for many years.

Again, thank you for the opportunity to present this final letter of support on behalf of all of us who live and/or work in the Sherwood and in the Sherwood West Planning Area.

We continue to look forward to your decision to expand Sherwood's UGB to include the entire Sherwood West Planning Area and give the City the ability to create and implement Sherwood West as a great addition to the City and the Sherwood Community as well as to the greater Portland Metro Area.

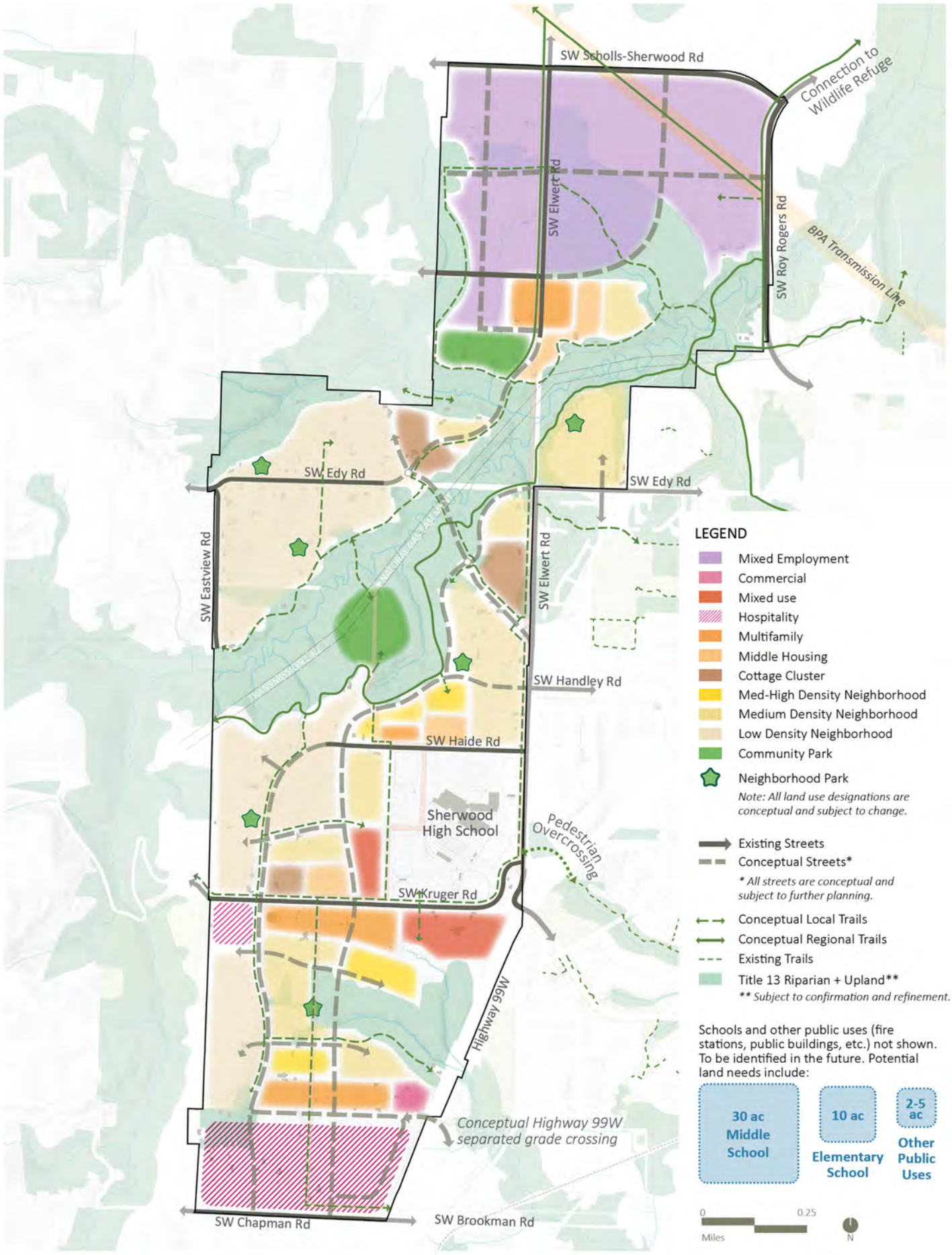
Finally, a profound thanks to you all and your staff's help and support of the City's long-term efforts to create the Sherwood West Plan.

Very truly yours,

John A. Rankin

JAR/bhs
Enc: Sherwood West Map
Pc: Gerritt Rosenthal, District 3 Councilor
Via email: [redacted]
Eric Rutledge
Community Development Director
Via email: [redacted]
Bruce Coleman
Economic Development Director
Via email: [redacted]
Clients and Former Clients via email

Figure 8. Composite Concept Plan Map



Miriam Hanes

From: John Rankin [redacted]
Sent: Tuesday, July 30, 2024 9:32 AM
To: Marissa Madrigal
Cc: Metro 2040; Gerritt Rosenthal; Eric Rutledge; Bruce Coleman
Subject: [External sender]Public Written Testimony to Metro Council and Staff - Sherwood West Planning Area 2024 "Ask"!
Attachments: Public Written Testimony to Metro Council - Sherwood West Concept Plan 07302024.docx; Sherwood West Composite Concept Map 4-3-24.pdf

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Dear Ms. Madrigal and Councilors Peterson, Simpson, Lewis, Rosenthal, Gonzalez, Nolan, and Hwang:

Please kindly accept our attached Public Written Testimony Letter regarding the City of Sherwood's 2024 "Ask" for the expansion of the Metro UGB to include the Sherwood West Planning Area.

If you have any other questions or comments or need additional help, please let me know. Thanks.

Best to you all and your families!

John
John A. Rankin LLC
Attorney at Law/Consultant
[redacted]
Lake Oswego, Oregon 97035

Mailing address:
John A. Rankin, LLC.
Attorney (Oregon)/Consultant
[redacted]
Murrieta, CA 92562-8712
[redacted]
Email: [redacted]

****

IMPORTANT NOTICE: This communication, including attachments, may contain confidential communications and/or privileged information. If you have received it in error, please delete it and notify me. Thank you.

Miriam Hanes

From: Terry R <[redacted]>
Sent: Saturday, August 17, 2024 7:57 AM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]Sherwood UGB Expansion

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely, Terry Repp

Miriam Hanes

From: Al Jeck [redacted]
Sent: Tuesday, July 23, 2024 3:36 PM
To: Metro 2040
Subject: [External sender]Letter to Metro Council; Urban Growth Report
Attachments: 2024-07-23 Letter of support to Metro KR.pdf

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Please see the attached letter of support for the Urban Growth Report and the Sherwood West UGB Expansion request. Thank you.

Al Jeck
Venture Properties, Inc.
[redacted]

VentureProperties
INCORPORATED

Creating Tomorrow's Communities Today

July 23, 2024

Council President Peterson and Metro Councilors
c/o [redacted]

Re: Draft Urban Growth Report

President Peterson and Councilors:

My name is Kelly Ritz, President of Venture Properties, Inc. and our associated home building company, Stone Bridge Homes NW, LLC. In 2015, we began development of the Mandel Farms subdivision, an 86-lot detached home community at Edy and Elwert Roads in Sherwood. We closed on our last home in October 2019. It was a successful project for us, and we are very appreciative of the support we received from the Sherwood community and city staff.

Shortly after starting Mandel Farms, we began working with City Planning staff and several property owners in the Sherwood West area to advocate for a potential urban growth boundary expansion for all or a portion of Sherwood West. Much study and discussion has taken place in the years since, culminating in an extensive two-year planning process and adoption of the Sherwood West Concept Plan in 2023. This led to a request to Metro later that year to expand the Urban Growth Boundary to include 1,300 acres within Sherwood West.

A key part of Metro's review of this request includes the recently completed draft Urban Growth Report. This report concludes that under baseline population forecasts, "approximately 150,000 additional homes are needed to meet expected population growth over the next 20 years," and to meet this demand, "we must continue to focus on public investment and removing barriers to housing production." Land to accommodate this growth will need to come from a variety of current, redevelopment, and urban expansion sources. Sherwood's UGB expansion request, created from strong community support, offers a thoughtful blueprint for a diversified residential-industrial-employment planned community. We believe that their plan has the best chance of supplying a mix of single-family, middle housing, and multi-family options for all age ranges now and into the future.

My companies and I wholeheartedly endorse your acceptance of the Urban Growth Report and recommend your continued review and approval of the Sherwood West Urban Growth Boundary expansion.

Thank you for your consideration of our testimony.

Sincerely,

Kelly Ritz, President
Venture Properties, Inc.

[redacted] Lake Oswego, Oregon 97035 • [redacted]

Miriam Hanes

From: Bruce Coleman <[redacted]>
Sent: Wednesday, July 24, 2024 6:52 AM
To: Al Jeck; Metro 2040
Cc: Eric Rutledge
Subject: [External sender]RE: Letter to Metro Council; Urban Growth Report

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Thank you Kelly and Al,

Brucce

Bruce Coleman
Economic Development Manager
City of Sherwood
[redacted]
Sherwood, OR 97140
[redacted]
www.sherwoodoregon.gov/economicdevelopment
[redacted]

ABOUT SHERWOOD ECONOMIC DEVELOPMENT: Sherwood offers many strategic advantages for business investment and economic development. Conveniently located in the southwest/I-5 Corridor of Greater Portland's Silicon Forest. Rated the 2nd safest city in Oregon, Sherwood also boasts a highly skilled workforce, outstanding schools, and strong community spirit. Sherwood enjoys easy access to I-5, I-205, Highway 99W and the Portland International Airport. Sherwood has a pro-business city government and encourages a wide range of businesses to locate and grow here, from startup entrepreneurs to Main Street businesses, to high technology advanced manufacturing. Sherwood boasts an engaged and collaborative city staff. We are actively creating new locations to serve our growing business community. We invite you to explore business growth opportunities in Sherwood.

From: Al Jeck <[redacted]>
Sent: Tuesday, July 23, 2024 3:36 PM
To: [redacted]
Subject: Letter to Metro Council; Urban Growth Report

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you are expecting this email and/or know the content is safe.

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Please see the attached letter of support for the Urban Growth Report and the Sherwood West UGB Expansion request. Thank you.

Al Jeck
Venture Properties, Inc.
[redacted]

This email may contain confidential information or privileged material and is intended for use solely by the above referenced recipient. Any review, copying, printing, disclosure, distribution, or other use by any other person or entity is strictly prohibited and may be illegal. If you are not the named recipient, or believe you have received this email in error, please immediately notify the City of Sherwood at [redacted] and delete the copy you received.

Miriam Hanes

From: Lindsay Roberts <[redacted]>
Sent: Thursday, August 15, 2024 9:41 PM
To: Metro 2040
Subject: [External sender]I oppose the Sherwood West Urban Growth Boundary expansion

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

As a resident and taxpayer of Sherwood, I strongly oppose the 2024
Sherwood West Urban Growth Boundary expansion proposal and the proposed expansion of the Urban Growth Boundary by 1291 acres. This excessive and unnecessary plan would destroy vital farmland, displace wildlife, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Lindsay Roberts
[redacted]
Sherwood, OR 97140
[redacted]

Miriam Hanes

From: STEVE ROSS [redacted]
Sent: Thursday, August 22, 2024 6:23 PM
To: Metro 2040
Cc: [redacted] Marissa Madrigal; Lynn Peterson; Gerritt Rosenthal; [redacted]
Subject: [External sender]Sherwood Urban Growth Boundary

CAUTION: This email originated from an **External source.** Do not open links or attachments unless you know the content is safe.

To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Steven Ross

Miriam Hanes

From: LOYAL ROTH [redacted]
Sent: Tuesday, August 20, 2024 3:19 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]UGB expansion proposal

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely, Loyal Roth

Rothchild Construction Co. Inc
[redacted]
Sherwood, OR 97140
CCB # [redacted]

Miriam Hanes

From: Dan Rutzick <[redacted]>
Sent: Thursday, August 22, 2024 6:09 PM
To: Metro 2040
Subject: [External sender]2024 Draft UGR Comment

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Hello,

The 2024 UGR has implications for local government planning processes as Metro's subsequent distributed forecasts inform local Housing Capacity Analyses, Economic Opportunities Analyses, and Regional Transportation Plan modeling.

The City of Hillsboro recommends Metro rely on a high population growth forecast to allow our region to be nimbler in addressing current and future housing and employment needs.

The 2024 Draft UGR demand scenario 4 involves faster household growth in 2044 coming from increased in-migration of younger households, consistent with historic migration dynamics, who typically seeking multifamily and middle housing. Though younger households who migrate to the region by 2030, 2035, and 2040 may initially prefer multifamily or middle housing, many will continue to demand single-unit detached for their growing household size and other reasons. The City of Hillsboro recommends Metro add a new UGR demand scenario 5 that involves faster household growth coming from increased in-migration of younger households, consistent with historic migration dynamics, but with a larger percentage of single-unit detached to meet the demand during the next 20 years.

Though the Draft UGR shows the region as having sufficient total industrial capacity, much of the industrial land supply consists of smaller parcels with an average lot size of 3.8 acres and a median lot size of 1.7 acres. The Draft UGR mentions there are only eight sites over 50 buildable acres inside the UGB that are available to the general industrial market. The final 2024 UGR should highlight the lack of sufficient large-lot industrial sites 25 plus acres in size available to the general industrial market. The final 2024 UGR should also highlight that less than 6% of the taxlots available to the general industrial market are medium-sized sites between 10 and 25 acres.

Thank you,

Dan Rutzick | he/him | *Long Range Planning Manager*
City of Hillsboro | Community Development: Planning Division
[redacted]
Hillsboro-Oregon.gov | Engage with Us

Miriam Hanes

From: Terrel Smith [redacted]
Sent: Monday, August 5, 2024 6:21 PM
To: Metro 2040
Subject: [External sender]Sherwood West Expansion Plan

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To whom it may concern,

I am writing in support of the Sherwood West Expansion Plan. Here is a link to the rationale for my support. It is my opinion that this is a very good plan for the appropriate expansion of west Sherwood and fits with the logical development surrounding the Sherwood High School and other areas.

Sincerely,

Terrel Smith
Retired teacher-Sherwood High School
[redacted]

Request that the Metro Council:

- **Approve the Sherwood West Concept Plan as proposed by the Sherwood community. Changes to the plan threaten community support.**
- Add 340 net acres of residential land to the UGB as proposed in the Sherwood West Concept Plan.
- Add 130 net acres of flex industrial land to the UGB as proposed in the Sherwood West Concept Plan.
- Add 135 net acres of commercial and hospitality land to the UGB as proposed in the Sherwood West Concept Plan.

Background Information:

Urban Reserve designation

- Sherwood West is proposed within an Urban Reserve. Urban Reserves are lands suitable for accommodating urban development over the next 50 years.
- Land that is considered most important for commercial agriculture and forestry use is in rural reserves and not eligible for urban expansion.
- City has clearly answered question of readiness and has prepared for adding Sherwood West to the UGB.

Regional Growth Projections

- Our region is growing and is expected to add an average of 15,000 new residents per year through 2044.
- Sherwood is preparing for its share of growth through the Sherwood West Concept Plan.
- The Sherwood School District supports the Sherwood West proposal. The School District Board of Directors and the Superintendent have expressed strong support for the plan.
- Our region will add approximately 315,000 new residents and 137,000 new jobs over the next 20 years under a baseline growth scenario.

Community Engagement

- Since 2021, the City has held over 30 public meetings on Sherwood West. The public engagement process was highly publicized, thorough and inclusive. The Sherwood West vision was developed by the Sherwood community.
- The diverse range of residents and stakeholders were represented on the Community Advisory Committee and Technical Advisory Committee.

- The Sherwood West Concept Plan has strong local support including unanimous approval from the Sherwood Planning Commission, Sherwood City Council, and Washington County Board of Commissioners.

Housing

- Sherwood and the Portland region are experiencing a housing crisis. The severe shortage of housing has increased prices and reduced affordability for all. Between 2017 and 2022, the Portland region experienced a 50.4% increase in homelessness.
- The Sherwood West Concept Plan will provide a minimum of 3,100 new units including mid-rise apartments, missing middle housing, and single-family detached residences. A minimum of 43% of new housing will be middle and multi-family housing.
- The plan proposes innovative zoning types including cottage cluster only and middle housing only zones will provide opportunities for first time home buyers and empty nesters to stay within or relocate to our region.
- Sherwood West proposes between 43% - 68% middle and multi-family housing. The range depends on how much middle housing is constructed in certain zones.

North District Employment Land

- The Sherwood West employment land provides opportunities for equitable economic growth.
- Employment land is not just about a simple supply and demand analysis. Economic development requires a land supply that enables specific industries to thrive.
- The average industrial parcel size in the metro region is 1.7-acres. Our region is facing an industrial land supply crisis similar to the housing crisis. Small BIPOC and women owned businesses are most vulnerable to rising business costs.
- The industrial vacancy rate in Washington County is 2.5% making business more expensive for key target industries. Small businesses are impacted the greatest by high industrial land costs and lease rates.
- Sherwood grew it's industrial and manufacturing base twice as fast than the region between 2017 and 2022.
- The Sherwood West site is competitive and will lead to new jobs for a growing part of the region.

Annexation and Development Phasing

- Sherwood is committed to thoughtful planning and careful growth over time.
- Approval of the UGB expansion does not immediately bring the land into the City of Sherwood. The land remains part of unincorporated Washington County until formally annexed into the City of Sherwood.
- Growth is expected to occur first at key nodes with access to infrastructure like near the new Sherwood High School.

- The Concept Plan includes a Preliminary Infrastructure Funding Strategy that describes how new infrastructure will be funded. Where current SDC rates do not cover the cost of infrastructure, a broad range of funding tools will be considered.

CLACKAMAS COUNTY

BOARD OF COUNTY COMMISSIONERS
PUBLIC SERVICES BUILDING
[redacted] OREGON CITY, OR 97045

Metro Council
600 NE Grand Ave.
Portland, OR 97232

August 14, 2024

RE: Draft 2024 Urban Growth Report

Dear President Peterson and Metro Councilors:

Thank you for the opportunity to comment on the Draft 2024 Urban Growth Report (2024 UGR) and Sherwood West urban growth boundary (UGB) expansion proposal. We recognize that completing this report during these times of uncertainty is extremely challenging. The report acknowledges that while there may be slower projected population and employment growth, the on-going housing availability crisis and continual need for large-lot employment land are factors that should not be minimized.

First, we urge the Metro Council to select the **high growth rate for both population and employment**. Planning for high growth will give jurisdictions the latitude not only to attract more investment opportunities in the region, but also to appropriately balance housing needs, land use, economic development, and transportation planning. Assuming low or baseline growth rates may result in unintended, adverse effects, by constraining local jurisdictions' ability to respond in real time to address population, employment, and housing requirements. It is also critical that findings within the 2024 UGR support necessary UGB expansion without forcing the removal of land from other locations.

As part of the Oregon Housing Needs Analysis (OHNA), the State will assign specific housing targets to individual jurisdictions beginning in 2025. This new paradigm for housing accountability necessitates consideration of the specific land need within individual jurisdictions rather than a singular focus on regional land supply. Selecting the high growth rate for both population and employment will create the best opportunity to meet the coming state-mandated housing targets and will allow the region to be more responsive and proactive in attracting potential new employers.

Second, we have concerns with **Metro's methodology that asserts that we have a surplus of industrial lands (nearly 6,000 acres) available inside the UGB to serve our region's need over the next 20 years**. We appreciate the supplemental industrial lands analysis, based on site criteria, that was developed as a part of the City of Sherwood's expansion request. However, **we believe**

that Metro's methodology for determining industrial "buildable lands" is flawed because it does not consider key site criteria factors in developing the Buildable Lands Inventory.

The 2024 UGR cites that of those 6,000 surplus acres, the average industrial parcel size is 3.8 acres, with a median industrial parcel size of 1.7 acres. Market factors indicate that firms seek parcels that are a minimum of 5 acres and are developable in 7 to 30 months or less. It is also clear that there is demand for large-lot industrial sites of 20, 50 and 100 acres in Clackamas County, and Metro's current method of evaluating industrial land supply fails to address this demand. In short, the lands that Metro is considering developable are not sufficient to meet the market need.

Clackamas County continually faces the challenges of not having an inventory of available and suitable employment land to support industry and employment for our workforce. While we know that the 2024 UGR decision is only one of many factors that influences the development of land, it is essential that this decision is made in a way to best support growth in all of our communities.

Finally, the comment period for the 2024 UGR was not sufficiently long to allow a robust discussion of these important issues. In the future, we urge Metro to provide a 90-day comment period between release of the draft UGR and issuance of the Metro Chief Operating Officer's recommendation to the Metro Council. It is imperative that local jurisdictions be given an adequate opportunity to weigh in on the UGR at an early point in the process. That said, we are looking forward to future opportunities to communicate with the Council before the Urban Growth Management Decision is made later this year.

In closing, the Urban Growth Management Decision process is driven by legal obligations that do not always translate into market reality. Discussions about the future can begin with questions on whether the region has the right amount of land to support housing and job growth, but they must not end with a simple yes or no answer. We are supportive of Metro Staff's recent proposal to update the 2040 plan and look forward to the opportunity to develop a better approach to planning for a bright future for our region.

Sincerely,

Clackamas County Board of Commissioners

Tootie Smith, Chair

Commissioner Paul Savas

Commissioner Martha Schrader

Commissioner Mark Shull

Commissioner Ben West

Miriam Hanes

From: Leonhr [redacted]
Sent: Wednesday, August 21, 2024 12:57 PM
To: Metro 2040
Cc: Home Standridge
Subject: [External sender]Concerns About the Proposed Sherwood West Concept

CAUTION: This email originated from an External source. Do not open links or attachments unless you know the content is safe.

>> I am writing to express my concerns regarding the Draft Urban Growth
>> Report and the City of Sherwood's proposed Sherwood West Concept.

>> First, the Draft fails to incorporate or thoroughly analyze the
>> figures upon which the Concept is based. Instead, it seems to merely
>> assess the City's "readiness" for expansion. While the City may
>> perceive itself as prepared to expand, the more important question is whether it should expand.
>> In my opinion, the answer is no. The proposed expansion is
>> unwarranted, as Sherwood has likely already reached its peak in terms
>> of the population that should or will move into the area.

>> For instance, the new high school was justified on the basis of
>> expected population growth, yet it has not come close to meeting the
>> attendance figures used to pass the Bond measure. We must be cautious
>> and not rely on the self-serving numbers the City provides when
>> making decisions about the Sherwood West Concept.

>> Furthermore, farmland is vital and irreplaceable. It is a key part of
>> the character of our city. Sherwood has already converted enough
>> farmland into developed areas. The thought of adding light industrial
>> buildings or more housing on the west side of our beautiful city is
>> unnecessary now and in the future. The residents of Sherwood have
>> been clear in their opposition to further expansion. Even METRO's
>> data shows that Sherwood's population is expected to increase by less
>> than 1,000 people over the next 20 years. Let's preserve the beauty that surrounds our city.

>> Thank you for your time and attention to these concerns.

>> Leon Standridge
>> [redacted]
>> [redacted]

Miriam Hanes

From: michelle Standridge [redacted]
Sent: Wednesday, August 21, 2024 1:21 PM
To: Metro 2040
Subject: [External sender]Draft Urban Growth Report/Sherwood Expansion

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August 21, 2024

METRO
Urban Growth Management Team
600 NE Grand Ave,
Portland, OR 97232

RE: Urban Growth Report, Draft 2024

Dear Council Members,

I am writing to provide comment on the Draft Urban Growth Report pertaining to the City of Sherwood's proposed Sherwood West Concept.

In reviewing the proposed draft report, I find the city of Sherwood's proposal to increase the city by 41% to be lacking in reliable data and concrete reasoning for such an expansion.

The west side of the city is already an area of congestion and outdated infrastructure. To add additional homes, light industrial buildings and traffic would severely impact the area, while requiring the loss of valuable, irreplaceable agricultural land and open space.

The impact on taxpayers for additional bond measures to then pay for roads, utilities, increased police and fire department services would also be a significant burden for a project that has shown no overall benefit to improving the quality of life for the residents of the community.

The layoffs currently occurring with Intel and other businesses in Washington County should be a cause for a cautious and well reasoned approach to solving a problem that does not exist for this area.

Thank you for your time in reviewing my correspondence.

Sincerely,
Michelle Standridge
[redacted]

Miriam Hanes

From: Jess Sunset <[redacted]>
Sent: Saturday, August 17, 2024 8:48 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]Opposition to Sherwood West Concept Plan

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To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Jessica and Randy Sunset

[redacted]

Sherwood, OR 97140

Miriam Hanes

From: Conrad Thomason <[redacted]
Sent: Monday, August 19, 2024 12:13 PM
To: Metro 2040
Subject: [External sender]Message To whom it nay concern

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As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

Sincerely,

Conrad Thomason
[redacted]
Sherwood, OR 97140

Miriam Hanes

From: kerrville <[redacted]>
Sent: Wednesday, August 21, 2024 10:39 AM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]West urban growth boundary expansion

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

As a resident and taxpayer of Sherwood
I strongly oppose the
Expansion of the West Urban Growth Boundary by 1,291 acres.
I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal!!
Please!
Sincerely,
Carolyn Thomason

Sent from my Verizon, Samsung Galaxy smartphone

Miriam Hanes

From: Jodi Tsutomi <[redacted]>
Sent: Tuesday, August 6, 2024 12:37 AM
To: Metro 2040
Subject: [External sender]Sherwood West Concept Plan

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Dear Metro Council,

Good evening and thank you for your time. I am writing this letter in support of the Sherwood West Concept Plan as proposed and supported by the Sherwood community and Sherwood City Council.

"New" and "fresh" are two words that come to mind in regards to this comprehensive plan. New strides and fresh faces. New ideas and fresh goals. New directions and fresh opportunities. This plan offers practical, thoughtful and forward movement; with a sustainable core based on values for healthy growth, preserving open spaces and upholding the strengths and benefits inherent in Sherwood.

Three key factors of the Sherwood West Concept Plan that in my opinion highlight its vital role:
1. Positive employment growth trends at 18% from 2017-2022.
2. Promoting a steady and robust economic growth and resdiential housing.
3. "2024 ECOnorthwest analysis North District Mixed Employment Area (MEA) of Sherwood West Concept Plan has site characteristics that make the land better suited to accomodate the industries that are growing and expanding in the Portland Metro area."

Sherwood must grow and evolve in a balanced way and I feel that the Sherwood West Concept Plan as proposed is that backbone.

Best Regards,
Jodi Tsutomi
Sherwoodian

Miriam Hanes

From: Jodi Tsutomi [redacted]
Sent: Tuesday, August 6, 2024 1:06 AM
To: Metro 2040
Subject: [External sender]Sherwood West Concept Plan

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Dear Metro Council,

Good evening and thank you for your time. I am writing this letter in support of the Sherwood West Concept Plan as proposed and supported by the Sherwood community and Sherwood City Council. I am asking the Metro Council to approve the Sherwood West Concept Plan as proposed.

"New" and "fresh" are two words that come to mind in regards to this comprehensive plan. New strides and fresh faces. New ideas and fresh goals. New directions and fresh opportunities. This plan offers practical, thoughtful and forward movement; with a sustainable core based on values for healthy growth, preserving open spaces and upholding the strengths and benefits inherent in Sherwood.

Three key factors of the Sherwood West Concept Plan that in my opinion highlight its vital role:
1. Positive employment growth trends at 18% from 2017-2022.
2. Promoting a steady and robust economic growth and resdiential housing.
3. Per the 2024 ECOnorthwest analysis: "North District Mixed Employment Area (MEA) of Sherwood West Concept Plan has site characteristics that make the land better suited to accomodate the industries that are growing and expanding in the Portland Metro area."

Sherwood must grow and evolve in a balanced way and I feel that the Sherwood West Concept Plan as proposed is that backbone.

Best Regards,
Jodi Tsutomi
Sherwoodian

Miriam Hanes

From: Wayne Vandekraak <[redacted]>
Sent: Thursday, August 15, 2024 3:42 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]West Urban Growth Boundary Expansion

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To whom it may concern,

As a resident and taxpayer of Sherwood, I strongly oppose the 2024 Sherwood West Urban Growth Boundary Expansion Proposal and the proposed expansion of the Urban Growth Boundary by 1,291 acres. This excessive and unnecessary plan would destroy vital farmland, increase traffic congestion, and burden residents with higher property taxes. I stand with the West of Sherwood Farm Alliance in urging you to reject this proposal and preserve the unique character and agricultural heritage of our community.

--
Wayne Vandekraak
[redacted]

August 22, 2024

Metro Urban Growth Management Team
600 NE Grand Ave.
Portland, OR 97232

RE: Draft 2024 Urban Growth Report

Dear Metro Urban Growth Management Team,

Thank you for the opportunity to review and provide comments on the Draft 2024 Urban Growth Report (UGR). This memo summarizes technical comments from Washington County Land Use & Transportation staff.

We appreciate the work Metro has done for the region's livability in managing the Urban Growth Boundary (UGB) in a way that balances the need to protect rural land uses and provide an adequate supply of land that has a high likelihood of successfully developing into places to live, work, visit, and play. Staff appreciate the opportunity to participate in the process through the Land Use Technical Advisory Group (LUTAG), Metro Technical Advisory Committee (MTAC), the Transportation Policy Advisory Committee (TPAC) and the economic development forum. We also appreciate the time that Metro staff have spent sharing their work with us and other partners through various committees and organizations throughout the process.

Since the origin of the Metro Urban Boundary, jurisdictions in Washington County have shown their ability to plan for expansions of the UGB areas in a way that creates desirable communities. We respectfully request that Metro correct the number of housing units built in North Bethany since the UGB expansion in 2002. The Draft UGR reports that only 573 units have been built, but the actual number is closer to 4,000. This is an important detail because it shows the success of building communities within UGB expansion areas over the last twenty years.

The primary concerns of Washington County staff are how the technical tools have been applied to evaluate the most likely development potential and demand scenarios. These concerns have been raised by the County and other partners throughout the review process. Two examples follow:

- The scenarios that Metro prepared along with the three growth forecasts assigned a demand share for single- and multi-family units. The high growth projection was paired along with the high demand for multi-family product scenario, and we did not see results of the high growth forecast modeled with high demand for single-family product or an even split. We believe that it is important to ensure adequate land for a

Department of Land Use & Transportation
[redacted] Hillsboro, OR 97124-3072
Phone [redacted]
www.washingtoncountyor.gov

variety of housing types. Past trends have shown that much growth (both single and multi-family) is happening outside of town centers, reflecting market realities from both a supply and demand perspective. Supporting and incentivizing growth in our town center areas is a part of the solution to our housing crisis but so are carefully planned UGB expansions and infill development all around the region. The limited scenarios shared in the draft UGR did not prepare us to evaluate the effects of these options.

- For employment/industrial needs, the evaluation of industrial land supply needs to account for the available size of properties and the flat topography needed by modern large-scale industrial development. While land with slopes between 5% and 25% has been successfully developed into new residential areas, and to some extent new commercial areas, the parts of the region's industrial land supply that are this topographically challenging are unlikely to be financially viable. Flatter industrial land is a prerequisite to future growth in industrial employment. Metro should update the calculations of available employment/industrial land to remove steep slopes.

County staff worked closely with Sherwood staff as they prepared the Sherwood West Concept Plan and we support their technical work and the process that they have gone through. Again, we appreciate the collaborative spirit with which Metro staff approached this Urban Growth Report and look forward to our continued work together.

Sincerely,

Erin Wardell

Erin Wardell, Assistant Director
Department of Land Use & Transportation

Attachments:
Washington County Board of Commissioners comment letter 07-16-24

July 16, 2024

Metro Council
600 NE Grand Ave.
Portland, OR 97232

RE: Draft 2024 Urban Growth Report

Dear Chair Peterson and Metro Councilors,

Thank you for the opportunity to comment on the draft Urban Growth Report (UGR) and Sherwood West urban growth boundary (UGB) expansion proposal. The 2024 growth management decision is the blueprint for how Metro Council will lead the region in planning for future housing development and employment opportunities. We appreciate that these decisions are challenging and acknowledge there are trade-offs that must be carefully considered in this decision process.

Our Board strongly supports the City of Sherwood's application for expansion of the urban growth boundary to include the 1,291 acres within the Sherwood West urban reserve area. The city has demonstrated their readiness to serve the area with governance and infrastructure as required by Metro's Urban Growth Management Functional Plan. The City's plan envisions that up to 5,582 housing units and 4,524 jobs could be accommodated in the expansion area. As we are all grappling with ways to produce more housing in the region and across the state, adding this land to our regional urban growth boundary makes sense. In addition, Sherwood has shown that the proposed Sherwood West employment area has the site suitability characteristics to attract more of the types of industry that Sherwood has successfully recruited to the city in recent years. Even though this is a regional urban growth boundary expansion decision using regional analysis, place matters in this consideration. Sherwood has demonstrated that they are a place where people want to both work and live.

We also encourage Metro Council to strongly consider selecting the high growth rate for both population and employment. The selected growth rates guide regional policy and funding decisions around housing, employment land and supporting infrastructure. Choosing low growth rates could artificially constrain our ability to plan for or make decisions to support the development of badly needed housing of all types, or further constrain opportunities to grow our region's traded-sector employment, which provides living wage jobs for thousands of our community members.

Board of County Commissioners
[redacted], Hillsboro, OR 97124-3072
[redacted]

Thank you for your consideration. We look forward to continued partnership with Metro in planning to accommodate future growth to keep our region a thriving and great place to live.

Sincerely,



Chair Kathryn Harrington
On behalf of Washington County Board of Commissioners

Cc: Board of County Commissioners
Sherwood City Council
Stephen Roberts, Director of Land Use & Transportation, Washington County
Catherine Ciarlo, Director of Planning, Development and Research, Metro

Board of County Commissioners
[redacted] Hillsboro, OR 97124-3072
[redacted]

Miriam Hanes

From: Erin Wardell <[redacted]>
Sent: Thursday, August 22, 2024 2:50 PM
To: Metro 2040; Eryn Kehe; Ted Reid
Cc: Ken Rencher; Jessica Pelz; Theresa Cherniak
Subject: [External sender]Washington County comments on draft UGR
Attachments: Washington County Draft 2024 UGR Comment Memo.pdf

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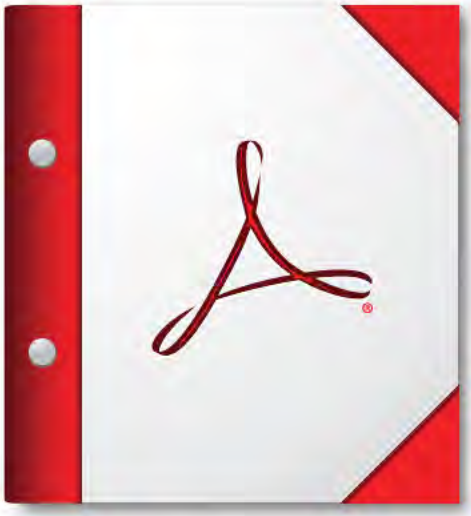
Hi Eryn and Ted,
Please see attached Washington County's technical staff comments on the draft UGR. We appreciate the opportunity to comment, and the work both of you have put into this year's report.

Erin Wardell, AICP | Assistant Director
Washington County Department of Land Use & Transportation
[redacted] | Hillsboro, OR 97124
[redacted]

INFO: Washington County email address has changed from @co.washington.or.us to @washingtoncountyor.gov. Please update my contact information.



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Miriam Hanes

From: Glen Hamburg
Sent: Monday, August 12, 2024 9:18 AM
To: Miriam Hanes
Subject: FW: [External sender]Restricted housing in Urban Growth Boundary

From: Doris Wehler <[redacted]>
Sent: Friday, August 9, 2024 5:40 PM
To: Metro 2040 <[redacted]>
Subject: [External sender]Restricted housing in Urban Growth Boundary

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When analyzing the expansion of the Portland UGB, you propose to maintain such a tight land supply that single family homes would only account for 23% of new housing. The rest of the units would be apartments of other forms of high-density living.

I believe 75% of people aspire to live in single family homes. Therefore, I am adamantly opposed to limiting single family homes to anything under 50%.

I am in favor of Sherwood's application to expand their UGB and sincerely hope they will be able to do so without this ugly single family home restriction.

Doris Wehler
[redacted]
Wilsonville, Or 97070
[redacted]

Miriam Hanes

From: Eric Rutledge <[redacted]>
Sent: Friday, July 19, 2024 3:11 PM
To: Miriam Hanes
Cc: Ted Reid; Eryn Kehe
Subject: [External sender]FW: Support of Sherwood West UGB

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Hi Miriam,

Some additional testimony in support of the UGB expansion. It looks like Marissa was copied as staff but I wanted to make sure you received it as well.

Thank you,

Eric Rutledge
City of Sherwood
Community Development Director
[redacted]

From: gwen werger [redacted]
Sent: Monday, July 1, 2024 11:49 PM
To: [redacted]
Cc: [redacted] Tim Rosener [redacted]; Eric Rutledge [redacted]; Keith Mays [redacted]
Subject: Support of Sherwood West UGB

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you are expecting this email and/or know the content is safe.

Dear Gerritt,

My name is Gwen Werger and my parents have owned a 10 acre parcel of land on Elwert Road since 1981. My sisters and I are now managing the trust that holds this property. I am writing in **support of the Urban Growth Boundary expansion request for Sherwood West.**

When my parents first purchased this acreage in 1981, the land west of 99W was mainly farms. Now there are several subdivisions east of Elwert Rd. as well as the newest Elementary School. As of 2021, Sherwood High School, the largest high school in Oregon, as well as a $247 million dollar investment by the community, was built on Haide Rd, which is directly west of Elwert Rd.

The amount of traffic on Elwert Rd resulting from the new High School as well as commuters to Roy Rogers Rd and beyond makes this area much more difficult to operate as farmland. The proposed 1,291 acres to be included into the UGB is now more suitable for additional housing and light industrial than it is farmland.

By including the 1,291 acres of Sherwood West into the UGB, this would provide land for affordable homes as well as parks and green space near the schools. Additional housing will increase the tax base as well as provide increased enrollment for the school district.

Adding Sherwood West into the UGB, will also provide Sherwood with land needed for additional economic opportunities. The city of Sherwood has a plan to expand job growth in the area and with that comes the need for affordable housing.

Sherwood does not want another missed opportunity to be included in the UGB like they had in 2018. Being forced to wait another six years for the opportunity to be included in the Metro UGB would be devastating for this wonderful community.

Thank you for your interest and consideration in this important issue. We are hoping Metro will vote in favor of the Sherwood West expansion request.

Sincerely,

Gwen Werger

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WESTSIDE ECONOMIC ALLIANCE

Marissa Madrigal, COO
Metro
600 NE Grand Avenue
Portland OR 97232

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Mayor Heidi Lueb
City of Tigard

Mayor Frank Bubenik
City of Tualatin

August 22, 2024

Dear COO Madrigal,

First, I want to thank you for convening the year-long Urban Growth Report Stakeholder table. It created an opportunity to better understand the work done by Metro staff preparing the report, while also hearing from partner organizations about concerns and challenges. While I do think it helped build goodwill among regional partners who often feel frustrated by the process, it did also lay bare some of the places where there may be an opportunity for improvements.

Beyond this Growth Management Decision, Westside Economic Alliance looks forward to continued partnership with Metro Council and staff to identify those opportunities for improving the input, process and subsequent outcomes for our region.

POPULATION & HIGH GROWTH PROJECTIONS

Turning to the 2024 Urban Growth Report, it's important that we begin with the population estimates on which so much of this report rests. The early conclusion is that regional growth is slowing because Oregon's birth rates are among the nation's lowest. Given this data point, the report correctly concludes that net in-migration will be the primary driver of regional population growth. The report goes on to state, "Slowing population growth also mean slower job growth."

What the report fails to state clearly is that if net in-migration will be the primary source of regional population growth then our region's, and our state's, housing and economic future will be overly dependent on smart policy decisions that encourage growth.

It is to that end that Westside Economic Alliance highly encourages COO Madrigal, and subsequently the Metro Council, to adopt high growth population forecasts for our region. It is far better to plan for growth and not see it realized than it is to plan for decline and risk the underproduction of housing and jobs, adding pressure that results in another housing crisis or economic stagnation.

Just as we are seeing an out-migration of a certain segment of our population due to their concerns about public policy choices, we could create in-migration through the adoption of a different set of policy choices.

Adopting the high-growth population forecast will give Metro and the local jurisdictions more flexibility to meet our communities' needs and should be viewed as a prudent public policy decision.

EMPLOYMENT LANDS

According to the Urban Growth Report, Metro staff have forecasted a surplus of Industrial land supply with a current capacity of 5,950 acres and a 20-year projection of a surplus of between 450 and 7,450 acres. However, the report also highlights some of the realities on the ground that act as major detractors to the current capacity estimate: in particular slope and lot size.

Slope

Over the course of the Urban Growth Report roundtable, we heard from developers that Oregon Revised Statute applies the definition for "buildable land" for residential construction to commercial and industrial land. As such, we learned that slopes of up to 25% are considered legally "buildable" for the purposes of all employment land, yet commercial and industrial developers say they will not consider land buildable with more than a 7% slope grade. When challenged on this, staff identified 1,300 acres with a slope greater than 7% that were counted within the buildable land inventory. **We recommend COO Madrigal and the Metro Council amend the Employment Land forecast to reflect this reality**.

Lot Size

An additional concern with the gross figure of 6,000 acres of 'surplus' industrial land is lot size. According to the Urban Growth Report the average lot size is 3.8 acres with a median lot size of 1.7 acres.

According to the data of the currently vacant industrial land, here is the breakdown of available vacant lots by acreage:

- 545 lots are less than 1 acre = 148 acres
- 97 lots are 1-1.99 acres = 142 acres
- 72 lots are 2-2.99 acres = 178 acres
- 49 lots are 3 – 3.99 acres = 167 acres

- 27 lots are 4 – 4.99 acres = 127 acres
- 22 lots are 5 – 5.99 acres = 125 acres
- 10 lots are 6 – 6.99 acres = 63.5 acres
- 13 lots are 7 – 7.99 acres = 96 acres
- 11 lots are 8 – 8.99 acres = 101 acres
- 6 lots are 9 – 9.99 acres = 66 acres
- 22 lots are 10 – 14.99 acres = 271 acres
- 12 lots are 15 – 19.99 acres = 219.5 acres
- 4 lots are 20 – 24.99 acres = 164 acres
- 6 lots are 25 – 29.99 = 107 acres
- 12 lots are 30 acres or more = 594 acres

Given the overabundance of small sites and the fact that the current vacancy rate for industrial land is below 5 percent across the region, the reality is that the vast majority of this acreage could not be used to serve the industrial market.

We recommend that COO Madrigal and the Metro Council direct staff to work with industrial developers to identify a minimum lot size that is realistic for effective industrial development. Any lots below that lot size should be removed from the overall land supply calculation.

As mentioned in the draft Urban Growth Report, the data and analysis of industrial land supply is not the only information that the Council may consider when determining whether there is a need to expand the Urban Growth Boundary. They may also consider whether there is a regional need for industrial sites with specific site characteristics such as larger sized sites.

The Oregon Semiconductor Task Force recommended that in order to be competitive over the next 5-10 growth cycle, the state needed to identify the following development ready sites:

- Two (2) sites of 500+ acres for advanced R&D or production fabrication operations
- Four (4) sites of 50-100 acres for device manufacturers or equipment manufacturers
- Eight (8) sites of 15-35 acres for key suppliers to the ecosystem

And while this site list is a statewide recommendation, we know that industries will often create clusters. Indeed, in EcoNW's report (Appendix 9) they note:

> The Metro Region already has a strong cluster for semiconductors in Hillsboro with Intel's Gordon Moore Park at Ronler Acres Research Campus, which creates 1,000 patents a year. This existing strength in semiconductor manufacturing can position the region to capture other semiconductor activities, and semiconductors are half of the state's annual exports. The semiconductor boom in the 1990s was

precipitated by the state having 2000 acres of industrial land, which led to billions of dollars of investment and doubling the industrial employee count.

To prepare for the next influx of semiconductor activity, the region will need to have a supply of industrial land to support business growth and expansion. The Semiconductor Task Force's Industrial Lands Subcommittee found that the key site characteristics that the semiconductor prefers is a location near other semiconductor businesses and labor, parcels of at least 25 acres, and sites that have infrastructure in place to support development that can begin within 6 months to three years. The subcommittee identified a lack of land that met these criteria.

And, as noted on pages 55-56 of the Urban Growth Report:

[T]he Metro Council established the following policy in the Regional Framework Plan:

'1.4.6 Consistent with policies promoting a compact urban form, ensure that the region maintains a sufficient supply of tracts 50 acres and larger to meet demand by traded-sector industries for large sites and protect those sites from conversion to non-industrial uses.'

Since the 2017 update of the Regional Industrial Site Readiness inventory of large industrial sites, 15 large industrial sites have developed. Six of the sites that developed are over 50 acres in size. There are ten remaining sites over 50 acres inside the UGB. Of those, two sites have marine or airport use restrictions, leaving eight sites over 50 buildable acres inside the UGB that are available to the general industrial market.

And so, the Semiconductor Task Force, the EcoNW Report and Metro's own policy recommends additional land of at least 25 acres with a push to identify 'sufficient supply of tracts 50 acres or larger' to meet the industrial needs of the region. And yet the overwhelming majority of vacant industrial land is LESS THAN 25 acres. There is an imbalance in acreage lot size availability and without a recommendation to discount acreage too small for real industrial development, Metro Council could stagnate the region's ability to leverage generational federal and state investment potential.

SUPERSITING AUTHORITY

Per the passage of Senate Bill 4, Oregon's CHIPs Bill, Governor Kotek maintains super-siting authority through the end of 2024. Should the Governor choose to use this authority, we urge Metro Council to see this as an additive, rather than as a replacement for, an Employment Land expansion in the Growth Management Decision.

We urge Metro to consider the generational investments that may be lost should the Governor provide the extraordinary opportunity of a regional supersite for semiconductors but the region is unable to support that work due to a lack of available mid-size lots needed for a healthy cluster.

CITY OF SHERWOOD EXPANSION PROPOSAL

We enthusiastically and without reservation support the City of Sherwood's request for expansion without any conditions. While Metro may want to make recommendations or provide incentives to encourage certain kinds of growth, we trust the rigorous public engagement process that Sherwood has already conducted and trust that they will continue to engage their community to understand how to grow reasonably and responsibly.

Metro staff made clear during our roundtable convening that Metro is not a zoning organization. To that end, we ask Metro to allow the city to work with their residents in the coming years to decide what makes most sense for their community's needs. It is imperative that policymakers recognize that every jurisdiction in our region has their own unique community needs and that heavy handed policy making to try to make suburban areas mimic urban areas is unreasonable.

We encourage Metro to engage in the process, as other regional partners plan to do, to provide input about best practice and guidance for equitable outcomes. But beyond that, **COO Madrigal and the Metro Council should allow local jurisdictions to grow within their own boundaries in a way that best reflects the community they are working with their residents to create**.

To be clear we ask COO Madrigal, and subsequently the Metro Council to:

- Add 340 net acres of residential land to the UGB as proposed in the Sherwood West Concept Plan as proposed.
- Add 130 net acres of flex industrial land to the UGB as proposed in the Sherwood West Concept Plan as proposed.
- Add 135 net acres of commercial and hospitality land to the UGB as proposed in the Sherwood West Concept Plan as proposed.

CLOSING

Westside Economic Alliance wants to again appreciate the work of Metro staff who prepared this cycle's Urban Growth Report. It is a massive undertaking, and this year another layer of public engagement was added via the Urban Growth Roundtable that took a significant amount of staff time.

To close, Westside Economic Alliance on behalf of our members, ask **COO Madrigal and the Metro Council to lean into a Growth Management Decision that is aspirational**. Throughout the region we are hearing alarm bells going off that our growth in the coming

decades will be reliant on in-migration. In-migration can be super charged through smart policy choices. Job growth can be ramped up through smart policy choices. Land readiness can be increased through smart policy choices and investments.

Adopting a high growth population scenario is the first step to unlocking the potential for smart regional policy and investments that will help our region's employers and local jurisdictions realize economic growth and prosperity.

Thank you for your time and commitment to the growth of our region.

Sincerely,



Elizabeth Mazzara Myers, Executive Director

Cc:

[redacted]

Miriam Hanes

From: Elizabeth Mazzara Myers [redacted]
Sent: Thursday, August 22, 2024 10:50 AM
To: Metro 2040; Marissa Madrigal
Cc: Lynn Peterson; Ashton Simpson; Christine Lewis; Duncan Hwang; Gerritt Rosenthal; Juan Carlos Gonzalez; Mary Nolan
Subject: [External sender]WEA | Testimony to COO Madrigal re: 2024 Urban Growth Report
Attachments: Metro UGR 2024_Written Testimony to COO_22Aug2024 (2).pdf

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Good morning.

Please accept the attached testimony prepared on behalf of the members of the Westside Economic Alliance.

Thank you.
Elizabeth



Elizabeth Mazzara Myers, **Executive Director**

email: [redacted]
mobile: [redacted]
web: www.WestsideAlliance.org

Miriam Hanes

From: Erik Lukens [redacted]>
Sent: Thursday, July 18, 2024 3:12 PM
To: Metro 2040
Subject: [External sender]attn. Metro Council
Attachments: OBI Sherwood West Letter of Support July 18.pdf

CAUTION: This email originated from an **External source.** Do not open links or attachments unless you know the content is safe.

Dear Metro Council:

Please see attached letter in support of the Sherwood West Concept Plan as proposed from Angela Wilhelms, president and CEO of OBI.

Erik

Erik Lukens | Communications Director
Oregon Business & Industry
[redacted] | Salem, OR 97301-4030 | www.oregonbusinessindustry.com



OREGON BUSINESS & INDUSTRY | OBI

July 18, 2024

Metro Council
600 NE Grand Ave.
Portland, OR 97232

RE: Support from Oregon Business & Industry for Sherwood West Concept Plan as proposed

Dear Metro Council,

I am writing to express Oregon Business & Industry's strong support for the Sherwood West Concept Plan as proposed. The plan would add badly needed land for housing, industrial and commercial use to Sherwood's urban growth boundary.

Oregon Business & Industry (OBI) is a statewide association representing businesses from a wide variety of industries from all of Oregon's 36 counties. In addition to being the statewide chamber of commerce, OBI is the state affiliate for the National Association of Manufacturers (our Manufacturing Council of Oregon) and the National Retail Federation. Our 1,600+ member companies, more than 80% of which are small businesses, employ more than 250,000 Oregonians. OBI's primary mission is to strengthen the business climate in Oregon.

Oregon relies upon its businesses to provide jobs for Oregonians, tax revenue for government services and many of the other benefits required by vibrant and prosperous communities. Employers need the right conditions to generate jobs and prosperity, however. These conditions include available and affordable land for growth and for housing. Denied adequate land for growth, businesses will invest elsewhere, and the jobs, revenue and other benefits they provide will follow. Unable to find housing they can afford, potential employees will do likewise.

I and my colleagues at OBI talk regularly with our members about impediments to growth and success in Oregon. Almost without exception, they cite a lack of available and ready land for expansion as well as the state's exceptionally high housing costs. The high price of housing in Oregon is in large part a function of the limited availability of buildable land.

The shortage of land routinely costs Oregon jobs and revenue. Earlier this month, the U.S. Department of Energy announced that it would lend Lebanon-based Entek $1.2 billion to finance a factory in Indiana that is expected to generate more than 600 jobs when it opens in 2027. Entek President Kim Medford cited the availability of land in Indiana as one reason for the decision to expand outside of Oregon.

[redacted] | Salem, OR 97301 | [redacted]
[redacted] | www.oregonbusinessindustry.com

The Sherwood West Concept Plan addresses this widespread problem in the local community. It is the product of a thorough, two-year public process and enjoys the support of the community. I urge you to approve the plan as proposed, which calls for the addition of 340 acres of residential land to the UGB as well as 130 acres of flex industrial land and 135 acres of commercial and hospitality land. The Sherwood community has not been consulted about the proposed conditions of approval, and pursuing them could well erode public support.

The Sherwood West Concept Plan as proposed enjoys the support of the community and Sherwood City Council. It would add badly needed industrial and residential land and, by doing so, improve Oregon's competitiveness. I urge you to adopt it as proposed.

Thank you for the opportunity to comment.

Sincerely,



Angela Wilhelms
President and CEO
Oregon Business & Industry
[redacted]

From: [redacted]
To: [redacted]
Subject: [External sender]UGB expansion
Date: Wednesday, June 28, 2023 7:04:50 PM

CAUTION: This email originated from an External source. Do not open links or attachments unless you know the content is safe.

Please do not expand the UGB anymore. I'm in Wilsonville watching with disappointment the big single family homes being built in Frog Pond West. These homes are not only unaffordable, they're not the high density we need to stop sprawl and address the climate impacts of our communities.

In Wilsonville, we have an empty large parcel, right downtown, that is ripe for high density redevelopment. Much of the city is low rise strip commercial development. We need to remove barriers and create incentives to foster affordable, high density, vibrant mixed use developments within our cities, not to expand the UGB.

Please hold the line.

Respectfully,

Dave W
Wilsonville, OR

Miriam Hanes

From: Kathy Gadinas <[redacted]>
Sent: Monday, August 26, 2024 8:20 PM
To: Metro 2040
Cc: [redacted]
Subject: [External sender]OPPOSE Sherwood expansion of UGB

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

This household is very much opposed to expanding the Urban Growth Boundary in Sherwood.

According to the Metro's research, there is plenty of industrial land inside the existing UGB for another 20 years. We also have enough vacant land to accommodate new housing and jobs for years if it is planned and developed carefully.

We really enjoy living in Sherwood. It's a beautiful community and would hate to see all the agriculture disappear when it's not necessary.

Please don't expand the UGB.

Thank you.

Kathy Gadinas

August 21, 2024

Lynn Peterson, Chair
Members of the Metro Council
Metro
600 NE Grand Ave.
Portland, OR 97232

Dear Chair Peterson and Members of the Metro Council,

The Sherwood Chamber of Commerce is a vibrant and active organization representing businesses in and around Sherwood with the primary goal of building a strong community. In that light, the Chamber especially appreciates the City of Sherwood's effort to create new business opportunities such as we currently see in the Tonquin Employment Area while also working to expand choices for people to live in Sherwood.

This same foresight is on display with the submittal to Metro of the Sherwood West concept plan, importantly funded in partnership with Metro. The thorough two-year planning process for both the Citizens Advisory Committee (CAC) and the Technical Advisory Committee (TAC) – which Metro representatives where a critical part of - has produced a concept plan that will realize a vision for housing and employment lands embraced by so many during this project.

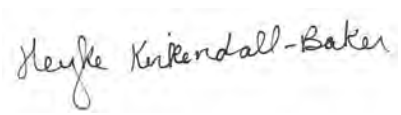
We commend the work of CAC and TAC for creatively weaving the residential and business needs of current and future Sherwood residents into a unique plan that is created by and for our community. The 200-250 acres of potential employment lands contained in the plan makes a strong statement that the future viability of our community depends on a healthy mix of land uses that will encourage more businesses to locate in our great city while creating desirable communities for people employed by these new businesses to work and live in the city.

The Sherwood Chamber of Commerce supports the City's application and Metro's favorable consideration and adoption of the Sherwood West concept plan, moving forward with an Urban Growth Boundary (UGB) expansion. We appreciate the Metro Council partnering to help make Sherwood the best it can be for many years to come.

Sincerely,

Sherwood Chamber of Commerce

By: Heyke Kirkendall-Baker, President of the Board



Miriam Hanes

From: Sherwood Chamber <[redacted]>
Sent: Tuesday, September 3, 2024 2:23 PM
To: Metro 2040
Cc: Chamber President
Subject: [External sender]Sherwood Chamber of Commerce - Letter of Support
Attachments: Letter of Support - Metro Council.pdf

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Good afternoon: Please find attached a letter of support for the City of Sherwood expansion project. Thank you. Heyke

--
Sherwood Chamber of Commerce
Office: [redacted]
Web: https://sherwoodchamber.org/

NAIOP
COMMERCIAL REAL ESTATE DEVELOPMENT ASSOCIATION
OREGON CHAPTER

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Mill Creek Residential

Jake Sly
R&H Construction

Executive Director
Geoff Horning

August 22, 2024

The Hon. Lynn Peterson, President
Metro Council
600 NE Grand Avenue
Portland, OR

RE: 2024 Urban Growth Report

Dear President Peterson and Councilors:

NAIOP, the Commercial Real Estate Development Association, is one of the leading organizations for developers, investors, owners & operators, brokers, and related professionals in office, industrial and mixed-use real estate throughout the United States, Canada, and Mexico. The Oregon Chapter's members represent a broad and diverse range of companies involved with commercial real estate activities in the Portland metropolitan area, including developers, owners, brokers, and managers, along with other professionals providing legal, finance, title, engineering, architectural, construction, and other services.

Thank you for the opportunity to comment on the draft 2024 Urban Growth Report which is a crucial element in planning for the future of commercial development in the region. Our testimony will focus on two areas:

- Strong support for the boundary expansion proposed by the City of Sherwood which includes our unequivocal endorsement of the findings and conclusions presented by EcoNorthwest in its *Sherwood West UGB Assessment* document found in Appendix 9;
- Concerns with the UGR's estimates of supply and capacity of industrial land

I. Support for Sherwood West UGB Expansion Proposal/Endorsement of EcoNorthwest Findings and Conclusions

NAIOP Oregon member representatives have been involved in Sherwood's planning process for the Sherwood West area for more than two years, and we very much appreciate the extensive time and effort the City has devoted to careful development of a plan that will provide much needed additional land for employment and housing. The Sherwood West Concept Plan includes land for housing, schools and civic facilities, park space, and 265 net acres for employment uses that would support about 4,500 new jobs. We strongly endorse the findings of ECONorthwest that this area has regionally

unique characteristics that would be very attractive to industrial development, including 40-to-50-acre parcels, minimal site aggregation, slopes under 5 percent, and access to Interstate 5.

Our industrial market members have long been well aware of ECONorthwest's finding that, unlike in the office and retail markets, vacancy rates for the industrial sector in the region are below 5%. This is an extremely low number and, with continuing strong demand for this type of space, has spurred a more than 20% increase in industrial rents over the last five years. These two trend lines are even more pronounced within Washington County, where the vacancy rate dipped to 2.5% in 2023 and rents increased 23%.

As ECONorthwest found, "A diverse regional market supply of sites is essential to maintaining an equilibrium in market pricing and to supporting a broad range of industries." Without such a supply, the Portland metropolitan region will be unable to compete with other national markets and will be passed over by employers looking for new locations and expansion opportunities.

The Sherwood West area fulfills this need quite well with its unique set of features as listed above by the ECONorthwest analysis. Also, it should be noted that Sherwood West is within an acknowledged Urban Reserve that was designated 14 years ago after an intensive public process to identify and compare parcels most suitable for UGB expansion and future urbanization. Expansion of the UGB to include Sherwood West is a logical and appropriate next step to ensure that the region is able to satisfy regional industrial land needs for the next twenty years.

II. Concerns with the UGR's estimates of supply and capacity of industrial land

A. Slopes and Parcel Size. According to the UGR, there are currently 5,950 acres of buildable industrial land within the region. This number, however, seriously overstates the realistic development potential for these lands since it includes properties with slopes of up to 25%, which is much steeper than is acceptable for industrial uses (the 25% slope standard is derived from Oregon Administrative Rules specifically pertaining only to residential land). A more accurate approach would be to use the acreage for "unconstrained" parcels shown on Table 5 of Appendix 6 which deducts those areas where 10% or less of the taxlot is up to a 7% slope. This amounts to 2,839 acres, but is also problematic since the average parcel size is 1.05 acres, much smaller than is typically seen for industrial development.

According to data from CoStar, since 2018 there have been 137 industrial buildings constructed within the UGB and Clark County. As shown in the table below, those 137 buildings had 21,834,448 total square-feet of net rentable area, with a total land area of 1,678 acres.

New Industrial Construction 2018-24 Within Portland UGB and Clark County, Washington	
Total Building Net Rentable Area	21,834,448 sq. ft.
Total Land Area	1,678 acres
Average Building Size	159,376 sq. ft.
Median Building Size	105,986 sq. ft.
Average Land Area	12.25 acres
Median Land Area	8.44 acres

As can be seen from these numbers, the average and median land area size of 12.25 and 8.44 acres for industrial developments over the last six years is far larger than the 1.05 acre average lot size seen in Table 5 of Appendix 6 in the UGR. This disparity is further reinforced by data presented in ECONorthwest's Sherwood West UGB Assessment (Appendix 9 of the UGR) regarding the size of industrial buildings constructed. According to the report, "Between 2019 and 2023, 7 million square feet of industrial buildings (sized 100,000 square feet or larger) were developed in the region across 33 buildings. This indicates that 39 percent of the industrial buildings built between 2019 and 2023 equal or are greater to 100,000 square feet, which shows the trend towards new industrial companies needing larger spaces."[1]

We would urge the Council to direct staff to develop recommendations for further reductions in projected industrial land capacity after taking into consideration the steep slopes and the extremely small average taxlot size of the buildable industrial acreage.

B. Projected Infill Industrial Development. A further problem with the 5,950-acre total amount of buildable industrial land is that 3,252 acres (55%) are projected to come from infill development of sites that are already considered developed. Only 2,574 acres (43%) are actual vacant, undeveloped sites. The infill projection is very aggressive for such remnant parcels and begs the question of what the historical rate of industrial infill has been.

We urge the Council to direct staff to produce this information so that it can be compared with projections for the future.

Thank you for the opportunity to comment on the Urban Growth Report and we appreciate the outreach efforts of your staff to brief in responding to our questions. Please let us know if we can provide any additional information.

Sincerely,

Kelly Ross
Public Affairs Consultant

[1] *Sherwood West UGB Assessment*, ECONorthwest, Urban Growth Report Appendix 9, page 8.

Miriam Hanes

From: [redacted]
Sent: Wednesday, September 4, 2024 1:27 PM
To: Metro 2040
Subject: [External sender]NAIOP Testimony re UGR
Attachments: NAIOP Letter to Metro re 2024 UGR.pdf

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Please find attached NAIOP's testimony regarding the 2024 UGR.

NAIOP
COMMERCIAL REAL ESTATE DEVELOPMENT ASSOCIATION
OREGON CHAPTER

Kelly Ross, Public Affairs Consultant
[redacted]

2024

Youth Cohort Report



Urban Growth Boundary

NEXT UP

NEXT UP



Our Mission

Next Up amplifies the **voice and leadership of diverse young people** to achieve a more just and equitable Oregon.

The impact of our work in Oregon

We create opportunities for young people ages 13-35, centering Black, Indigenous, youth of color and intersectional youth, to build their individual and collective power. Since 2002, our work has scaffolded a wave of young people who are leading the charge to dismantle oppressive systems and institutions so that our communities can thrive.

Impact Snapshot

1,000+

alumni of our youth leadership cohorts

7

unique leadership and internship programs

40%

Oregon youth voter turnout in 2022, compared to 27% nationwide



Background

Over the course of 2023 and 2024, Next Up and Metro engaged 15 young people in a decision-making process around expanding the urban growth boundary (UGB). Since youth are one of the groups most impacted by long-range planning decisions this was an opportunity to incorporate their unique perspectives, reflections, and recommendations for the UGB.

Program Goals

Educating

Educate youth leaders through a variety of topics included in the Urban Growth Management decision-making process.

Consulting

Incorporate youth voices and lived experiences in long-range planning decisions.

Building

Build ongoing relationships with participants, supporting leadership opportunities, and meaningful connections with Metro.

Who Took Part

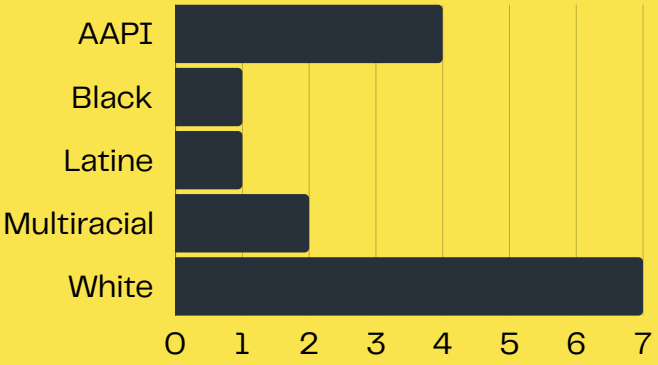
15 Participants

8 Meetings Held

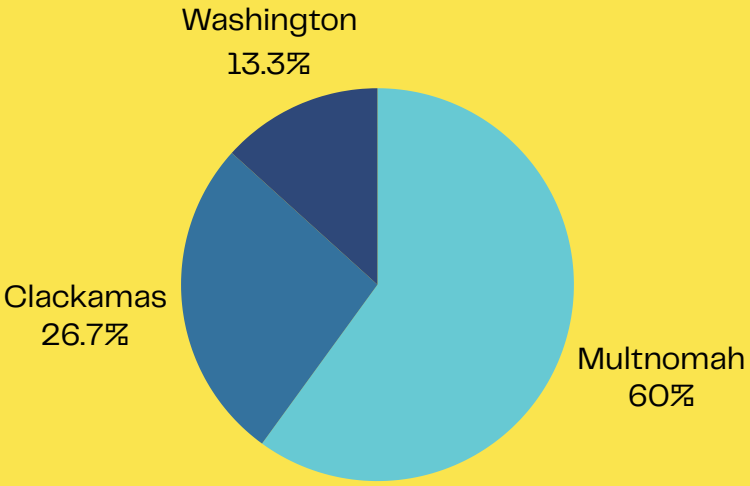
16 Median Age

18 Average Age

Race and Ethnicity



County



Recruitment

To ensure that the cohort reflected the communities within Metro's constituency we reached out to our connections in Multnomah, Washington, and Clackamas County. Over the last three years, Next Up has been a part of Metro's Civic Engagement grant which allowed us to deepen our youth civic engagement in Clackamas County. Recruiting involved reaching out to the very engaged members from previous Next Up action groups to ask them to join. That included board members, past cohort members, past volunteers, and community members. In total, we had 27 applicants for the 15-person cohort. Our youth cohort is made up of young people from 7 cities across the Metro Region including Beaverton, Tigard, Gladstone, Gresham, Milwaukie and West Linn.

Meeting Summaries

September 19, 2023

Background on Metro, urban growth management, urban growth report requirements, and decision making structure

November 2, 2023

Review group goals, statewide planning history, role and purpose of zoning, group concept plans for Sherwood West

December 5, 2023

Guest speaker Glen with Metro, concept planning process and complexities, and boundary expansion requirements.

February 12, 2024

Guest speakers Andrea and Valeria with Metro, the housing crisis overview, Metro's role in regional housing funding and production, and begin to establish group values and priorities.

April 4, 2024

Guest speakers Eric and Joy with City of Sherwood, revisit and compare cohort concept plans with the Sherwood West concept plan, and learn about Sherwood's decision making process.

May 7, 2024

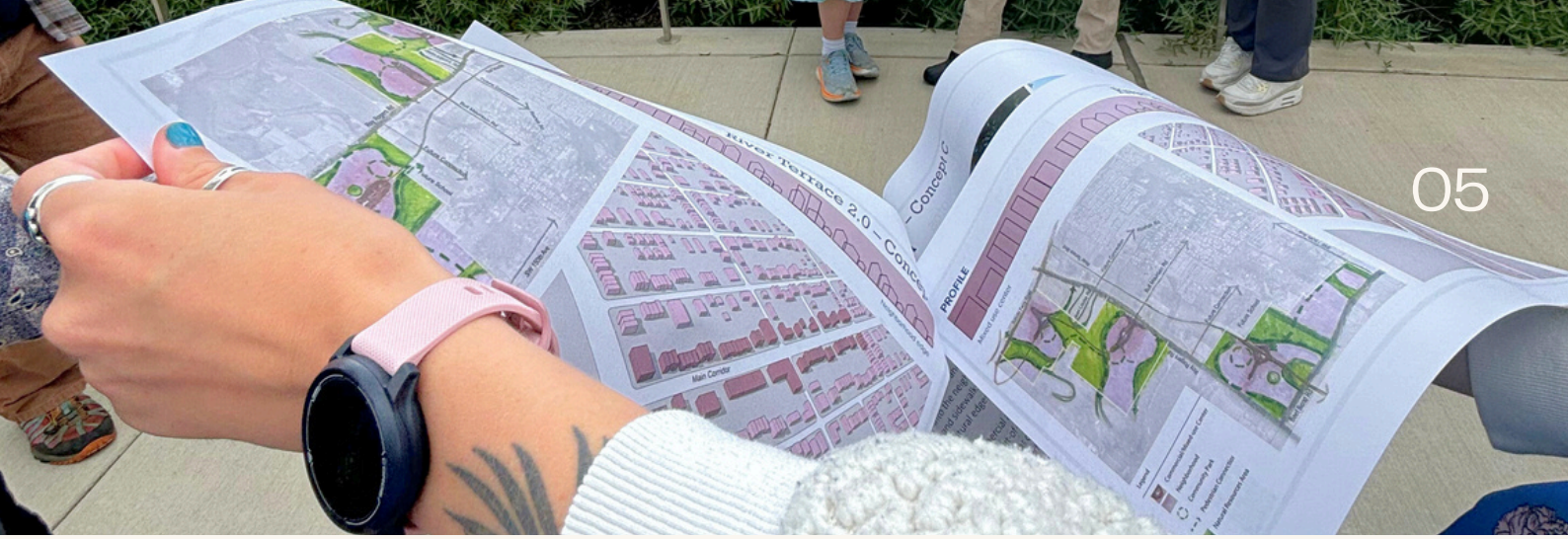
Guest speakers Eryn and Ted with Metro, overview of urban growth report analyses, introduction to the COO recommendation and conditions of approval, group activity about capacity and demand

June 15, 2024

Group field trip to Tigard to learn about the River Terrace development from Senior Planner Schuyler Warren. The group learned about the most recent expansion to the UGB and the process from concept plan to implementation.

July 18, 2024

Reviewed key takeaways of the UGB report, discussed Sherwood expansion proposal, provided ideas for Metro Council, discussed opportunities for testimony, and completed the feedback survey.



FIELD TRIP

Tigard River Expansion

To better understand the proposal and possible implementation of the Sherwood West Proposal, the youth cohort went out to visit the Tigard River Expansion.

During the trip they met with Tigard Senior Planner Schuyler Warren to learn about the Tigard River Terrace UGB expansion. They also heard about the expansion proposal process and the factors involved in creating a concept plan. Finally, the group saw current development in action and visited the edge of the Urban Growth Boundary to see the difference between urban and rural reserves. Topics explored during the field trip prompted the group to reflect on what they would like to see in the Sherwood West expansion area, based on hearing and seeing some of the outcomes of a past expansion area.

Cohort Questions

Why are commercial spaces not placed in neighborhoods but on major streets?

How do we encourage walkable neighborhood development (with access to schools, shops, and parks) within all neighborhoods of Sherwood West?

How are critical nature areas (ex. wildlife reserves) protected during a UGB expansion?

What transportation systems will be put in place in Sherwood West and what type of topographical structures are already in place that would help with stormwater systems?

Participant Reflections

After visiting the Tigard River Expansion, cohort members shared their reflections with us.

"There is a big lack in housing accessibility [in the Tigard River Expansion]. Everything is expensive [and] definitely contributes to the wealth divide and separation. There were multiple spots with a lot of beautiful nature. Seeing that highlighted the importance of preserving and incorporating nature into the expansion."

"Many of the challenges facing communities and democracies today stem from planning decisions; in expansion that does not address limited economic diversity, neighborhoods become economically stratified, which is a detriment to cities. This is a new idea that I reflected on today, and I think it is something Sherwood should consider and plan around before expanding."

"One value I'm really glad is represented is the need for higher density middle housing to support more affordable housing and a more diverse city population. I wish that they considered planting more native plants and trees in the area they are expanding into."





Youth Driven Recommendations

The UGB Youth Cohort considered the questions, “What should Metro Council consider when making a decision about the urban growth boundary?” and “What are the top values that should guide the UGB process?” to make their recommendations. They created four themes to explore these questions further:

01 / Equity and Meaningful Community Engagement

02 / Livability and Access

03 / Sustainability, Environmental Preservation, and Climate Justice

04 / Housing Affordability

Recommendations for Equity and Meaningful Community Engagement



01

Present perspectives that are not always heard

02

Understand how areas surrounding the proposed expansion and people living there may be affected

03

Center racial equity when considering new housing and jobs

04

Local participation and education

05

Listen to young people – they know more about youth life, priorities, and their challenges

06

Support low income and BIPOC communities

Reflections on Equity and Meaningful Community Engagement



As the youth cohort learned about the urban growth management decision, a primary theme in their feedback was ensuring that the process centered equity and meaningful community engagement. Many participants wanted the Metro Council to make sure that they were hearing a broad variety of perspectives, especially those that are not always heard in this process.

Sherwood West

When learning about the Sherwood West proposal the cohort considered how people living in surrounding areas may be affected. They emphasized that the plan must focus on racial equity impacts when discussing access to future homes and job opportunities. Additionally, the cohort emphasized the importance of local participation and education in community engagement processes. They shared that special focus should be given to young people when looking for feedback, as they are the generation that will be most impacted in the future by plans that are made today.

Recommendations for Livability and Access



01

Prioritize walkability, public transit access, jobs with livable wages, and community spaces by including coffee shops, grocery stores, mixed use development inside expansion areas to minimize car dependency

02

Livability and access in UGB development must include coffee shops, grocery stores, mixed use development inside expansion areas to minimize car dependency, easy connections to nutritious foods, and amenities and diverse multiuse community spaces

03

Planning should encourage residents to walk, not solely rely on driving

04

Residential development should have pockets of commercial so that people can meet their needs close to home without driving

05

Plan for accessibility for the disabled community

Reflections on Livability and Access



Walkable Communities

Another recurring theme throughout the youth cohort meetings was the importance of building communities with access to opportunities and a variety of community spaces, especially for access that was not car-dependent. New neighborhoods should include spaces for everyone and people should be able to meet their needs without having to rely on a car. Cohort participants emphasized priorities of walkability, public transit access, and accessibility in connections through new neighborhoods. Accessibility also means opportunity – jobs with livable wages, and opportunity to meet needs like buying nutritious foods and gathering with other community members.

Recommendations for Sustainability, Environmental Preservation, and Climate Justice

01

Fight climate change

02

Incentivize developments that provide for housing, food, and water needs while encouraging biodiversity

03

Healthy and equitable tree canopy

04

Avoid the creation of urban heat islands

Recommendations for Sustainability, Environmental Preservation, and Climate Justice



A Top Priority for Metro

As the cohort discussed planning for new homes and jobs in the region, members felt that sustainability, environmental preservation, and climate justice must be a top priority for Metro Council. The group wanted to see natural resource preservation in any proposed expansion area and cautioned against creating urban heat islands. Some members of the group spoke of the importance of a healthy tree canopy and planting native species that are more resilient to the changing climate. Overall, the cohort emphasized that Metro should strike a balance between new housing developments and jobs while protecting the natural environment and biodiversity.

Recommendations for Housing Sustainability

01

Housing for All



02

Support for high density and mid density housing in order to provide more options for people, while making the most sustainable use of the land

03

Question: What is the developer's mission when it comes to building homes?

04

Question: Will the expansion help with the housing crisis?

Reflections on Housing Affordability



A Guiding Principle

The youth cohort learned about the statewide housing crisis and the role that local and regional government played. After hearing about how our government addresses housing needs, they strongly emphasized that housing affordability must be a priority guiding the UGB process. Cohort members wanted to see plans that included housing options that would work for many different people – including options for different housing types and price points. The expansion plan must be demonstrably proven to address the housing crisis, and if there is any expansion, it should be used to provide the most affordable housing options to the most amount of people.

Final Recommendations for the Urban Growth Boundary

To reach consensus on final recommendations the cohort evaluated categories based on a scale from “nice to have” to “must have.” Each member picked their top 3 categories and provided additional details. What emerged as the top 4 categories were: affordable housing, equitable access, car-free transportation options, and green infrastructure.

Car Free Transportation

- Accessible, walkable infrastructure
- Safe crossings
- Keeping disability community in mind – build it right the first time
- Bus access as development expands – needed to connect commercial and residential areas – with consistent service
- Transit-supportive densities

Equitable Access to Jobs, Neighborhood Amenities, Recreation, and Housing

Must be able to access businesses and community spaces near homes

Green Infrastructure

Such as street trees, stormwater facilities, and native plants to prevent urban heat islands

- Durable infrastructure – long term cost savings
- Relationship building with Indigenous communities
- Wildlife crossings - awareness of disruption to nature
- Steward and preserve natural resources and features to be used as green infrastructure (rather than artificially replaced)
- Natural areas are common spaces and community gathering places

Affordable Housing

- Housing to match available jobs
- Public money investment
- Access to transit

Closing Reflections



A robust conversation about potential conditions of approval prompted participants to think about what topic areas mattered most to them and provide additional detail about how they would like to see the conditions implemented. Some of these topics may be folded into the COO recommendation and topic areas with more specific details may be more suited for discussion during the comprehensive planning process.

"Protecting people, the planet, and our shared ecosystems is essential to equitable futures. [Regional Planning] makes sure there is enough housing without messing up the environment...and encourages denser development."

Participant



Closing Reflections

The following reflections were collected in July 2024 through a final feedback survey about participants experiences throughout the cohort.



Reflection on Group Goals

“I am familiar with Urban Studies, Urban Planning, Economics, Government, and Policy… but I had no idea what the process of expanding (or halting the expansion of) the Urban Growth Boundary.”

“I came wanting to better understand the urban growth boundary decision process and now I do.”

“I'm happy to have shared my perspective and experiences with Sherwood planners, Metro, and other important voices in the Sherwood West expansion.”

“What suprised me about this process what how difficult it was to navigate affordable housing and equity in the planning process. I knew that there were a lot of behind the scenes poitics happening that makes it difficult but I didn't realize that more than politics, its also the past history of having lots of single family homes taking up a bunch of space and the need to consider areas for jobs and parks and libraries that go around housing. Also, it seemed unrealistic to go high density housing everywhere and having developers agree to high density very low density. It also suprised me about how understandable the process was… I thought I would get completely lost because other older youth in the group seemed to have a background in environment and regional planning, so it was nice to be able to absorb the content and participate with the group.”

“I like how the UGB process works. I hope our voices actually have the power to influence the final outcome of the Sherwood West expansion.”



Reflections on Cohort Logistics

Overall, participants appreciated how the meetings were planned, materials provided, and pacing of the cohort. Specifically, they enjoyed the field trips, presentations, and guest speakers who gave additional insight into the different aspects of urban planning. Some suggestions for the future included a summarized set of notes at the end of meetings, more interactive opportunities during the meetings, and less time between each meeting. A majority of participants remarked that the length of the cohort was ideal, with one participant sharing that it, "allows [the cohort] to connect and have more time to absorb the information." Those that gave feedback unanimously shared that they are walking away from this experience learning or achieving what they hoped when they first joined.

Percent of Participants Who Shared We Accomplished or Exceeded the Goal

87%

Understanding Metro's role in regional governance

87%

Understanding regional land use history and urban growth management

100%

Understanding the analyses within the urban growth report

75%

Established group values regarding regional growth

"Regional governance enables collaboration... between cities to solve today's pressing issues, whilst building capacity to reimagine tomorrow together."

Participant

Next Steps

All participants shared an interest in providing either written or in-person testimony to the decision-making bodies at upcoming public hearings.

Giving Public Testimony

Public hearing on an ordinance: The public can offer testimony before any legislative action by the council. You can join council meetings in person on Thursdays at the Metro Regional Center at 10:30 AM, or join online via Zoom.

Public hearing on a resolution: Council resolutions are not required to have public hearings, but public testimony may be accepted at the discretion of the council president.

General meeting: Every council meeting includes an agenda item called "public communications" where you can provide testimony on topics that are not on the agenda.

How to Submit Testimony: You may submit testimony to Metro Council online at any time. To be included in the record for a public hearing or meeting, testimony must be received before the start of the meeting. Written testimony received by noon on the day of a meeting will be shared with the Metro Council in advance.

Timeline for Decision Making

July 9, 2024: Public comment period on the draft UGR begins
July 18, 2024: Final youth cohort meeting
August 22, 2024: Public comment survey on draft UGR closes
August 26, 2024: Release COO recommendation
September 5, 2024: Council work session on COO recommendations and public comment themes; full public comment summary provided at Council meeting
*__September 11, 2024:__ MPAC discussion of COO recommendation and recommendations to Council; request any final MTAC advice
*__September 25, 2024:__ MPAC recommendation to Council
*__September 26, 2024:__ Council holds public hearing on COO recommendations
October 1, 2024: Council provides direction to staff at work session
November 21, 2024: Council first reading of ordinance; public hearing
December 5, 2024: Council second reading of ordinance; decision

* Opportunity to provide public testimony (in-person, virtual, or written) at this meeting

Appendix
Notes from UGB Cohort

Notes from Meeting #4 (2/12/24)

“What should Metro Council consider when making a decision about the urban growth boundary?”

- Presenting perspectives that are not always heard (youth, BIPOC, etc) and center issues such as racism, climate change, houselessness and their interaction with housing
- Affordable housing and public transit access
- Has potential upzoning been considered in measuring developable lands?
- Fighting climate change
- Housing everyone
- Equity and how surrounding areas may be affected
- Affordable housing should be considered and mapped
- Community spaces
- High density and mid-density housing
- Racial equity when it comes to housing and work/jobs
- Jobs in the area that can provide livable wages
- Who are the developers/their mission when it comes to building homes
- Hearing what everyone says and mostly gathering what everyone had mostly think around
- Metro Council – we as a youth cohort know more on the youth life, priorities, and how schools takes effect on distance to school, library, home, etc
- Local participation and education
- How much does Metro collaborate with other national metro areas and local communities to build more security and solidarity?
- How can Metro incentivize co-op developments that provide for housing, food, and water needs while encouraging biodiversity?
- A priority I'm hearing and seeing the importance is racial equality – I think that's always important to keep at the forefront and consider as the UGB/housing develops
- Will this expansion help with the housing crisis?

Appendix
Notes from UGB Cohort

Notes from Meeting #5 (4/4/24)

- Community spaces! They benefit the community – so of course that's super important. But with that, I think that mixed use spaces sprinkled throughout all areas is good, maybe ensure that's around regular neighborhoods
- I don't see the current plan building enough affordable housing types
- How to promote diversity among the people that move there (racial and ethnic diversity)
- I really hope they find a way to include coffee shops, grocery stores, and mixed use development inside low density zones
- Requiring medium density
- Connections to nutritious foods and amenities/community spaces
- Planning should encourage residents to walk, not drive
- Residential (especially low density) should have pockets of commercial so that people can meet their needs close to home without driving (15 minute cities)
- Healthy and equitable tree canopy
- Accessibility and disability community
- Reducing new parking infrastructure
- Not creating urban heat islands
- Supporting low income and BIPOC communities
- Walkable, livable spaces for growing communities
- Housing for new people moving into Sherwood in coming decades and more employment

Appendix
Notes from UGB Cohort

Notes from Meeting #6 (5/7/24)

The top values that should guide the UGB process are:

- Affordability
- Walkability
- Building communities
- Equity
- Sustainability
- Future resilience
- Consciousness of environmental impact
- Needs of communities
- Awareness of context and complexity
- Racial and climate equity
- Environmental and economic sustainability
- Community engagement and PAR across a wide variety of interests
- Equity, affordability, environmental preservation, increasing density
- Equity, climate justice, affordable housing

Regional planning is important to me because:

- Collaboration and mutual trust is important to reimagine tomorrow together!
- Regional governance enables collaboration and mutual aid between cities to solve today's pressing issues, whilst building capacity to reimagine tomorrow together
- Protecting people, the planet, and our shared ecosystems is essential to equitable futures
- It directly impacts the health and potential of communities and environments today and into the future
- Because it addresses important issues through large (?) engagement. Through regional planning cities needs are better addresses and understood
- Because it makes sure there is enough housing without messing up the environment too bad and encourages denser development
- Because I want there to be sustainable and affordable housing options for upcoming generations
- Because I want everyone to live in a walkable community

Appendix
Notes from UGB Cohort

Notes from Field Trip Meeting #7
Tigard River Terrace Expansion
(6/15/24)

What's one exciting thing you've seen or learned about the Tigard River Terrace Expansion?

- Seeing a hawk and a deer at the intersection of SW Beef Bend and SW 150th at the corner of River Terrace 2.0 and Kingston Terrace, it was exciting to see an example of the boundary between urban and rural. Standing between the urban growth boundary – half inside and half outside – was also an interesting experience of what the UGB actually means on this field trip. From these experiences, I thought more about trees, wildlife, environment, and the ways our interests coexist.
- Getting to know and understand more about the history is really fascinating. But the environment is what really caught me and the know the problem that UGB is trying to solve.
- River Terrace 1.0 is very expensive, this is one of the many reasons River Terrace 2.0 is appearing to solve many issues such as economic difference.
- There were multiple spots with a lot of beautiful nature. That highlighted the importance of preserving and incorporating nature into the expansion
- There is ambition to build high-density, transit-rich neighborhoods!
- Seeing plants and wildlife flourishing still despite development hearing about Tigard's history like why Bull Mountain isn't a part of the city and the land swap.

What's one value represented in the Tigard expansion? What's missing?

- Represented: commitment to more housing
- Missing: (to an extent) collaboration and coexistence of multiple priorities
- The friendly environment really stands out to me and is really represented. But I feel like the economic status differential is something that is missing like the Art Rutkin elementary is in the middle of 1.0 and 2.0 River Terrace, but Tigard has a long history, like normal housing, the higher elevation, usually have more expensive houses. So Tigard is missing some of the differences, jobs, etc.

- There's a big lack in housing accessibility here, everything is expensive, definitely contributes to the wealth divide/separation. But they seem to be good on some nature incorporation (better than a lot of other areas), that storm draining spot was a whole habitat!
- Access to green space is present.
- Affordability and equitability is missing
- One value I'm really glad is represented is the need for higher density middle housing to support more affordable housing and a more diverse city population. I wish that they considered planting more native plants and trees in the areas they are expanding into. I understand that plants from other areas look nicer and more attractive but I think it's important to give priority and space to plants that are supposed to be there and have been in Oregon.

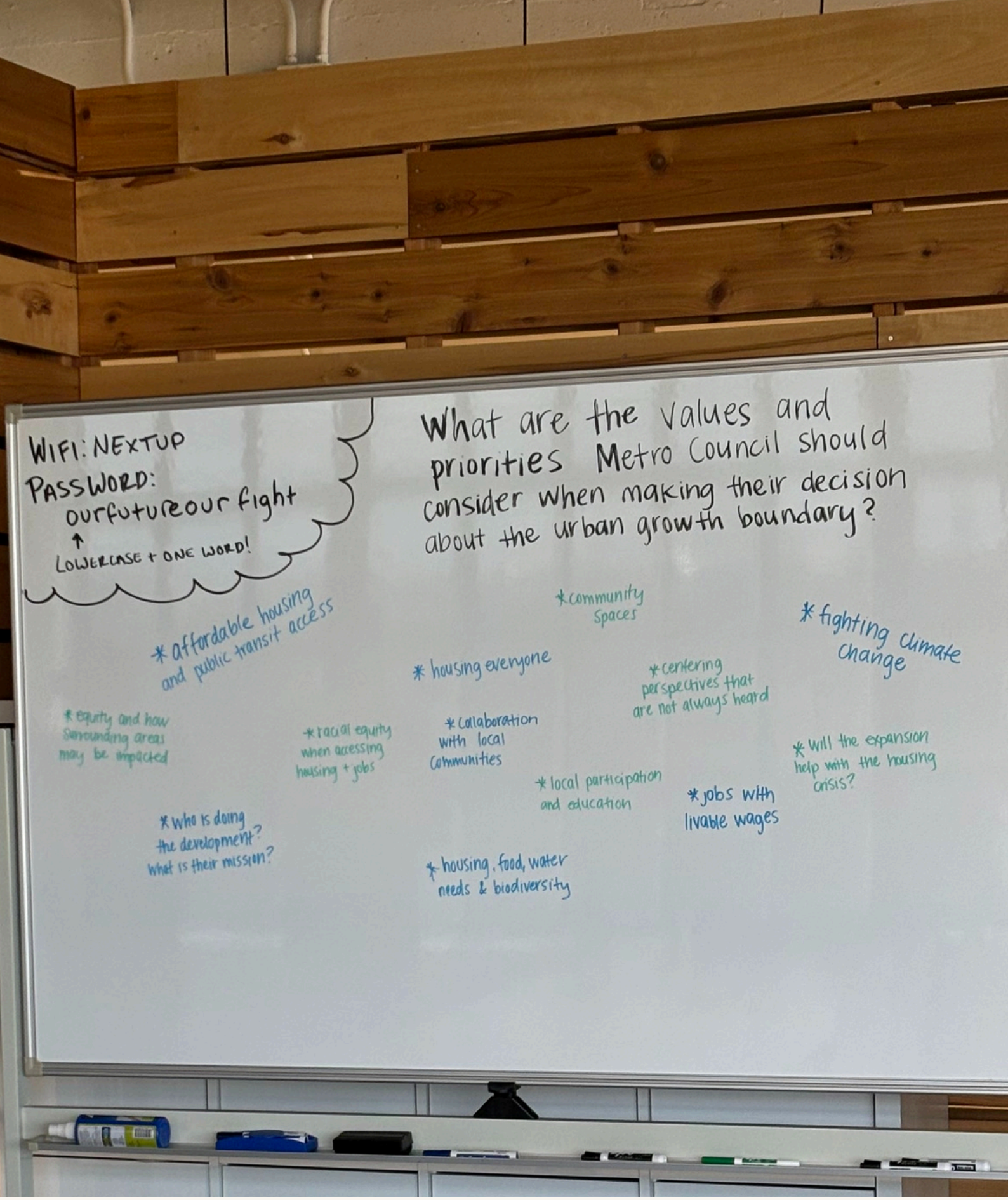
What's one thing you learned today that connects to the conversations we've been having around the Sherwood Expansion?

- Many of the challenges facing communities and democracies today stem from planning decisions; in the expansions that do not address limited economic diversity, neighborhoods become economically stratified, which is very detrimental to cities. This is a new idea that I reflected on today, and I think it is something Sherwood should consider and plan around expanding.
- Mainly how to efficiently use the boundaries, housing displacements, and how to manage the place is really similar to Sherwood expansion.
- Another connection that I've made is the transits that can be really important to save fuel, keep green transportation is pretty key.
- The importance of middle house. [Schuyler Warren] talked about Tigard's push for it, and variety in housing types is something we've talked a lot about and wanted.
- I've seen varying housing types being built and planned
- Just how important having water drainage systems are to having a successful expansion and development. I also have learned more about how nuanced housing decisions are during expansions and how we have to consider both developer perspectives and regional need.

What are questions you have?

- How similar or different will Sherwood's expansion ultimately be compared to Tigard's? What is similar or different about their communities?

- How does adding more housing affect its affordability and will it be enough to make communities more livable?
- Why are most decisions centered around the margins? Just in general, are there ways to rethink or reconsider ways existing communities are planned and structured to address some of the issues the UGB expansion is trying to address? (like the coordination between them, especially after learning about the long lead time with new developments
- I'm curious generally about the developer perspective and priorities. What are the main clashes?
- I wonder more about the plants, [Schuyler Warren] talked about bringing in non-native plants, but only really highlighted the aesthetic pros. Does that pose a threat to native plants thought? What is the potential harm?
- Why are commercial spaces not placed in neighborhoods but on major streets?
- How do we encourage walkable neighborhood development (with access to schools, shops, and parks) within all neighborhoods of Sherwood West?
- How are critical natural areas (ex. wildlife reserves) protected during a UGB expansion?
- What type of natural wetlands and other topographical structures are already in place that would help with stormwater systems? Is it similar to Tigard's situation?
- What transportation systems will be put in place in Sherwood West?
- How long do you think it will be before development actually starts happening in Sherwood West?



NEXT UP

@nextuporegon
info@nextuporegon.org
www.nextuporegon.org

Materials following this page were distributed at the meeting.



Oregon Zoo

September 26, 2026

Metro Council Meeting

Together for wildlife

The Oregon Zoo connects our community to the wonder of wildlife to create a better future for all.





Half Century Award

Oregon Zoo

for

50 years

of Continuous Accreditation

2024

ASSOCIATION OF ZOOS & AQUARIUMS

Community treasure

- 1.3M visitors annually
- Community access program
- Ballot measure passed
















Oregon Zoo

Campus Development

Phase 1: *Completed*
2008 Bond
40% of zoo upgraded

Phase 2: *Future*
2024 Campus Plan



Developed with community

Portland DART School

Youth Empowerment Project

Autism Empowerment

Self Enhancement Inc.

Boys & Girls Clubs

People of Color Outdoors

Portland Community College

Cascade Forest Conservancy

Confederated Tribes of Siletz Indians

Rosewood Initiative

Centro Cultural

CAIRO PDX

Neighborhood House

Adelante Mujeres

ZAP Team

Community Advocacy Council



Campus plan priorities

- Protecting animal health and well-being
- Providing conservation education
- Conserving water and energy
- Ensuring a welcoming zoo for all
- Advancing species conservation/recovery



Public benefits programs

- Clean air construction
- Construction career pathways
- Contracting equity



Resolution 24-5431

For the purpose of accepting the Oregon Zoo 2024 Campus Plan




Together for
Wildlife

Urban growth management: COO/Staff Recommendations

Council public hearing
September 26, 2024

Engagement

Metro advisory committees: MTAC, MPAC, CORE

UGR roundtable

Youth cohort

45-day draft UGR comment period

Presentations to additional interested groups from across the region

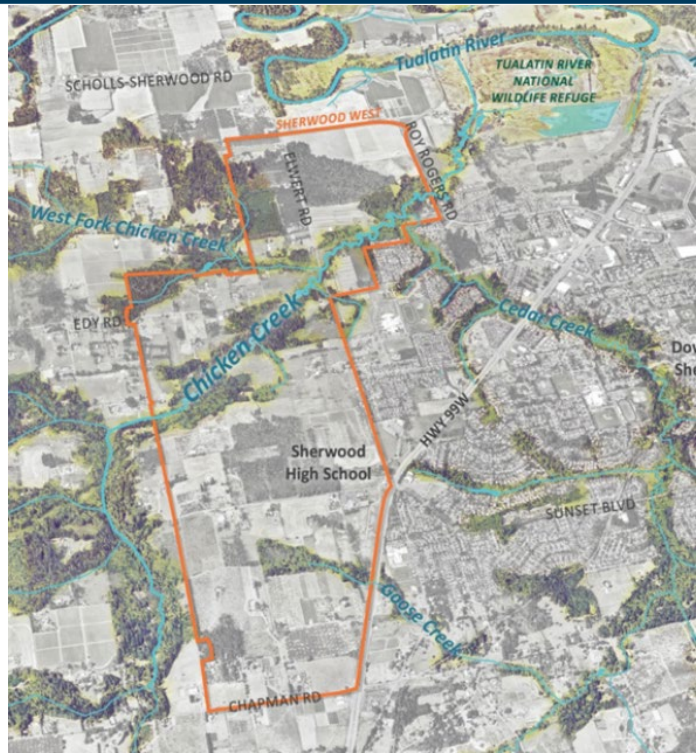


New analyses in the 2024 Urban Growth Report

- Population forecast by race/ethnicity and disability status
- Additional housing needs analyses:
  - Affordability
  - Houselessness
  - Underproduction
- Equity outcomes in past expansion areas
- Financial feasibility of redevelopment and infill
- Gentrification and displacement trends

COO/Staff Recommendations

- Expand the UGB to include the Sherwood West urban reserve, based on a regional need for land for housing and industrial development
- Consider conditions of approval that clarify City commitments and address regional values



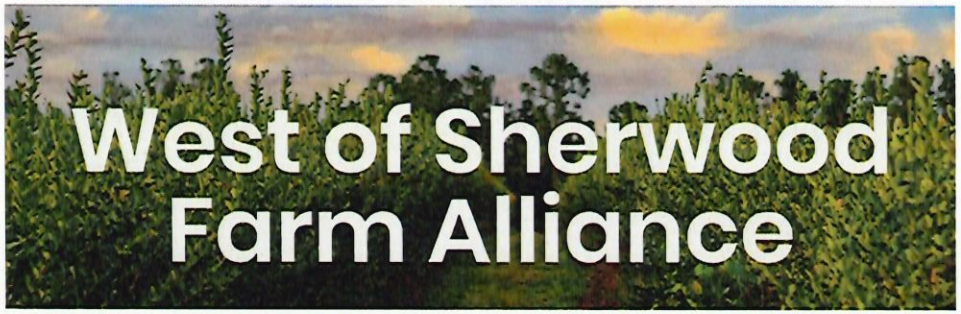
Topics for potential conditions of approval

- Number of housing units
- Housing affordability
- Protections for large industrial sites to grow the region’s high-tech manufacturing sector
- Broad based community engagement
- Tribal consultation

	July	August	September	October	November	December
Council	Discussion of draft Urban Growth Report	Public comment survey available until August 22 COO/Staff recommendation	**Public hearing** on COO/Staff recommendation	Council direction on decision Oct 8	Council first reading; **public hearing**	**Council second reading; final decision**
MPAC			Discuss COO/Staff recommendation; *Recommendation to Council*			
MTAC			Discuss COO/Staff recommendation; *Recommendation to MPAC*			
CORE	Discussion with Sherwood staff	Discussion of UGB condition concepts	Discuss COO/Staff recommendation; *Recommendation to Council*			

oregonmetro.gov





Sherwood Vacant Lands Capacity Analysis
Executive Summary

September 2024

SHERWOOD WEST CONCEPT PLAN

1,291 acres added to UGB 41% expansion of city's land area.

3,117 to 5,582 new expensive low-density homes & rentals

4,524 new jobs

$334 million for new infrastructure.

$58- $70 million funding shortfall for infrastructure

$45,000 - $51,000 system development charge/new home

Using vacant land already inside the Sherwood Planning Area means:

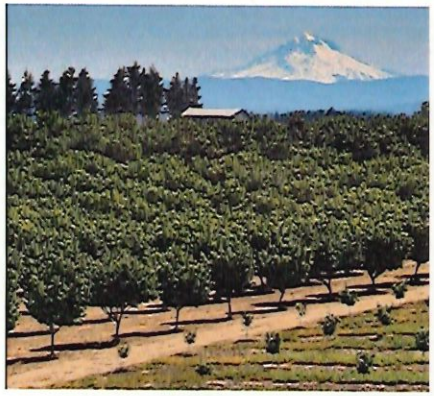
- *Less Sprawl*
- *Less Taxes & Fees*
- *More Housing Choices*
- *Plenty of Jobs*
- *Protects farmland and forests*
- *Conserves water and wildlife*

Natural Resource & Environmental Protection



Saves Chicken Creek and adjoining riparian areas and forests from development and retains their carbon sequestration values; helps maintain water quality in Tualatin River National Wildlife Refuge.

Conserves world-class farmland & forestlands.





These lands can grow and have grown high value crops like Pinot Noir grapes, hazelnuts and Christmas Trees.

Taxpayer Savings

Table 1. Estimated Infrastructure Costs by District and Category

	Water		Sanitary Sewer		Storm		Parks		Transportation		Total District
	Costs	%	Costs	%	Costs	%	Costs	%	Costs	%	Costs
North	$10,745,000	8%	$18,162,500	13%	$10,932,500	8%	$23,428,890	17%	$72,850,000	54%	**$136,118,890**
Far West	$8,367,000	20%	$4,801,500	11%	$2,775,000	6%	$0	0%	$26,920,000	63%	**$42,863,500**
West/Southwest	$29,164,800	19%	$10,099,350	7%	$6,177,500	4%	$23,815,610	15%	$85,787,301	55%	**$155,044,561**

Eliminates unnecessary infrasttucture needed to catalyze Sherwood West Concept Plan, such as pedestrian overpass and new roads, water, and sewer and stormwater facilties west of Roy Rogers and Elwert Roads.

Sherwood Vacant Land Employment Capacity



Uses Sherwood West Concept Plan employment densities for currently vacant industrial and commercial zoned lands.

Sherwood Vacant Land Housing Capacity





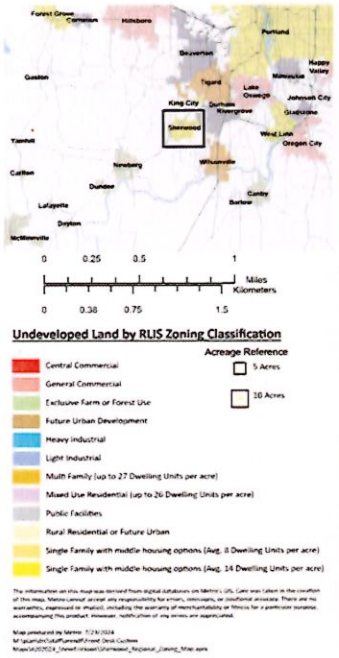


Uses actual market rate housing developments and Metro Housing Bond projects plus Sherwood Housing Need Analysis to develop alternative housing concept using only vacant land zoned for residential or designated "future urban." 59% of the residential land would be developed with single-family homes.

Vacant Lands in the Sherwood Planning Area

Metro RLIS General Zoning Class	Vacant Acres
Single Family Residential	146.76
Mixed Use Residential	22.53
Multi Family Residential	36.07
Commercial	22.99
Industrial (Light & Heavy)	229.78
Future Urban Development	111.43
Rural (residential, farm, forest use)	18.16
Public Facilities	5.03

Metro Resource Center Map of Vacant Land in Sherwood Planning Area Prepared August 2024





The Sherwood Planning Area is the land inside Sherwood city limits, the Brookman UGB expansion concept area and Tonquin Employment Area

Summary of Methodology for Capacity Analysis of Sherwood Planning Area Vacant Lands

Sherwood Planning Area* Vacant Lands Capacity

0 additional acres added to the Urban Growth Boundary

4,572 new homes with a closer fit with housing needs

5,526 new jobs

$58-$70 million taxpayer and ratepayer savings because no funding shortfall; $ millions saved on unneeded infrastructure.

Conserves instead of develops **precious farmland, forests, streams and wildlife.**

* The Sherwood Planning Area is the land inside the city limits of Sherwood, plus the Brookman Addition area and Tonquin Employment Area previously added to the UGB.

Ron Bunch for West of Sherwood Farm Alliance

SHERWOOD WEST URBAN GROWTH BOUNDARY EXPANSION REVIEW OF INFRASTRUCTURE COSTS -

INTRODUCTION AND FINDINGS SUMMARY FINDINGS

The following summarizes infrastructure costs, housing affordability, land use and other issues not acknowledged by Sherwood in its 2024 Sherwood West Urban Growth Boundary (UGB) Proposal. Sherwood's aspirational plan for UGB expansion was based on a predetermined outcome of how to urbanize West Sherwood rather than acknowledging the consequent risks and costs and whether these outweigh potential benefits. This report responds to these fundamental issues from an "order of magnitude" perspective which defines issues in broad themes. This process is often used in government and business venues to develop findings and criteria on which to base policy decisions. It is not dissimilar to what Sherwood and its supporters have done in developing a generalized development concept for Sherwood West. However, the questions to be answered are different. Often, this kind of approach addresses the most basic questions of whether to proceed or not, with a course of action.

A decision by the Metro Council to expand the regional UGB next to Sherwood by 1,291 acres would involve both private and public benefits and impose risks, costs and losses to several groups. An example is shown in Table 1. How these benefits, losses and risks are fairly mediated among stakeholders, including the region as whole, is a matter of public policy. In this context, it is important for the Metro Council to evaluate other growth options to ensure the development needs of both Sherwood and region are addressed in the most beneficial and least harmful ways possible. For example, decision-makers must ask, "Can needed housing and employment be better accommodated elsewhere and in different ways at less cost, risk and disruption." For example, an alternative is that housing and employment needs may be better accommodated inside the existing Metro area cities and or targeted, more manageable and less impactful expansions.

Table 1: Benefits, Costs and Risks from Sherwood UGB Expansion as Proposed by West Sherwood Concept Plan.

Potential Beneficiaries	**Motive and/or Benefits**
PRIVATE BUSINESS, LOCAL GOVERNMENTS AND UTILITIES	
Property Owners and Land Investors	**Financial gain** from zoning commitments for entitlements and public investments
Commercial, Industrial and Residential Real Estate	**Financial gain** from real estate transactions and public investments from zoning and commitments for public investments

	Table 1 (Continued)
Banks and Financial Institutions	**Financial gain** from providing capital to private companies that urbanize the Sherwood West
Companies that do residential, commercial and public works construction	**Financial gain** from constructing the infrastructure and developing the area for urban use.
Existing Sherwood Businesses	**Potential Financial gain** from new Sherwood West residents and businesses but may be tempered by competition from new business.
New Commercial Business	**Financial gain** from expanded customer base.
School District and Special Service Districts and Private Utilities	**Financial Gain:** Larger enrollment and tax base, but must be balanced with need for future expenditures, including both capital investment, maintenance, administration and ongoing investment.
Washington County and Clean Water Services	**Increased Revenues:** Revenues from increased TDT and regional connection fees (RCC) would assist in expanding major street and sewer systems
PEOPLE	
Private Sector Workers (Not necessarily located in the region)	**Short Term Jobs;** Design, engineering, construction , real estate and public sector jobs
Public Sector Workers (Not necessarily Sherwood residents)	**Jobs:** Municipal, service district and education sector jobs
Those who need housing currently or in the future – home buyers and renters	**Needed housing,** but low-/ moderate-income housing and middle-housing may not be feasible due to costs
RISKS AND LOSES	**Description of Risks and Losses**
Future and Existing Sherwood Property Owners and Residents	**Cost:** Short and long -term public subsidization of UGB Expansion planning, management, and infrastructure maintenance. **Costs:** Personnel costs and refocus of political and administrative efforts on UGB expansion away from existing communities where more benefit can be derived. **Costs:** Increase in future utility rates and property taxes associated with development of extensive new urban infrastructure system ,inflation factors and maintenance of same in perpetuity. **Quality of Life**: Low transit feasibility, auto-dependence ,Increased traffic and traffic congestion and environmental degradation. Rapid changes in community character and disruption caused by significant period of major construction activity. **Quality of Life and Cost:** Climate impacts of auto-dependent development and environmental degradation of the area's natural resource functions and values. **Quality of Life and Cost:** Investment of time and resources in high-cost low return venture. No consideration of lower impact/cost alternatives to

	Table 1(Continued) meet future employment/ housing needs especially low- and moderate-income housing.
Existing Property Owners, Workers and Agriculture	**Disruption of quality of life and uncertainty** posed by spiral of property value speculation. **Demise of existing agricultural operations** urban encroachment; incompatible land uses; erosion of regional agricultural business infrastructure; hazard and disruption posed by increased traffic and congestion. **Job loss** for farm workers and vineyard operations and wineries; **Loss of investment** in farm and related business ventures and inability to acquire similar value land elsewhere. **Disruption** caused by long term construction activity. **Loss of access to agricultural products** .
Environment and Climate	**Expansion of low-density auto-dependent sub-urban development** with significant land, air, water, and energy consequences. **Negative impact on local stream corridors** such as on the Tualatin River watershed fish and wildlife habitat and water quality. **Negative consequences for the adjacent Tualatin River National Wildlife refuge**

Summary Findings

The following are this report's main findings .These are based on information contained in the Sherwood 2024 urban Growth Boundary Proposal, City of Sherwood budgets, Clean Water Services (CWS) and Washington County connection charges and transportation development tax rates. Additional details and methodology follow about how the findings were derived.

Low Number of Net Developable Acres: The net developable land area within the proposed 1,291-acre UGB expansion is about one-third of total, or only 432 acres ,once undevelopable areas (steep slopes, stream corridors) and needed roads, utility easements, school grounds, public safety facilities and park land are considered. This is illustrated by Table 2 below.

Table 2: Sherwood West Net Buildable Acres

Net buildable Acres (per Sherwood West UGB Concept Plan)	605
Less transportation 20% ROW and Utility Easements	(120)
Less Schools and possible Fire, Life, Safety Facility	(43)
Less Urban Parks	(50)
Total **Net** Buildable Area	432 Acres

Funding Gap for New Major Roads and Utilities: The total cost of major roads, sewer and water lines, and storm drainage facilities necessary to set the stage for development is estimated by the UGB Concept Plan to be in the range of $344 million per the City's most recent consultants estimates This includes $46-50 million is needed for parks.

The plan proposes that development would "front" these costs through system development charges (SDCs). However, the City's consultant identified significant "funding gaps" that would have to be addressed because SDC's in some categories are not adequate. Sherwood would have to find a way to make up a deficit likely in the range of $35 –$ 45 million based upon projections. In addition, all or some of the SDC charges will be incorporated into the price of the housing, making it difficult for developers to deliver needed affordable housing, especially given the low densities that Sherwood and the Metro Chief Operating Officer (COO) are proposing.

It's important to stress that Sherwood's ability to levy SDCs to fund needed streets and utilities is much less than that of Clean Water Services and Washington County. The city is a "junior partner" in this respect.

Parks Funding is Inadequate. The "foundational infrastructure " costs above do not include park land acquisition and development. The City's parks SDCs, if applicable, are anticipated to yield between $45 and $50 million. At the expected cost per acre of developable land this might be adequate to purchase, but not develop, enough land for needed parks. If expended for land acquisition, these funds would also not be available to build the trail system proposed by the UGB Concept Plan.

Other Costs Schools, Highway 99W Overcrossing , Public Safety: Sherwood's UGB Expansion plan did not consider other significant public costs, including elementary and junior high schools, a new fire station, and road improvements to Highway 99W such as overcrossing and street intersection improvements. These are estimated to be at least $81.58 million. Schools and a new fire station represent "down-stream" costs and not necessary for actual development of the Sherwood West. However, they are important to acknowledge as part of the total cost burden the public will carry.

Roads and Utilities Costs for Private Development: The cost of providing all infrastructure to the Sherwood UGB Expansion area includes neighborhood streets,

smaller (8") water, sewer and storm drainage lines, plus including all other parts such as catch basins, manholes, fire hydrant, etc. needed to serve private development. This is usually paid for by private development directly (not through SDCs) and recouped after property sales. This analysis estimates private development costs at about $119 million based on the preferred land use concept in the UGB expansion plan.

Table 3: Sherwood West Order of Magnitude Summary of Costs/Investments (Millions $)

Highway 99 W Improvements	8.60
Foundational Infrastructure – Major roads, sanitary sewer collection system, water transmission lines, storm drainage conveyance and regional facilities. Includes parks and trails	344.24
Development infrastructure – Streets and Utilities	119.00
Total	471.84

Note:

- **Costs for Highway 99 W Improvements to accommodate West Sherwood traffic are derived from Sherwood transportation plans. These estimates vary from the above to $30 million.**

High Infrastructure Costs Per Developable Acre: The above costs and the UGB expansion's low net yield per acre of developable acre results in high infrastructure costs of developable land – up to $ 1 million per developable acre.

High Road and Utilities Costs, City and County SDCs Make it not Feasible to Build Affordable and Middle Housing: High system development charges, transportation and utility costs, will make it not feasible to build affordable and middle-income housing in Sherwood West.

Overall Low-Density Residential Development Precludes Transit Service and increases Auto-Dependence. Development of Sherwood West would have remarkably low density. Consider if the whole area of 1,292 acres accommodated 4,100 units, the overall site density would be about 3.2 units per acre.

The City of Sherwood Would Assume Substantial Long-term Maintenance, Repair and Replacement Costs for Sherwood West's Needed Infrastructure. The Sherwood West UGB Expansion would result in the planning ,engineering, and construction of miles major sewer and water collection and conveyance lines and associated water storage tanks and water and sewage pump stations. In addition, there will be several miles of new and reconstructed major collector and arterial streets in the area.

Sherwood would assume long term maintenance and repair of these major systems and also the utilities that support actual development . These are major ongoing costs. and per

the City's 2023-2024 budget. It costs about $8.2 million a year to do so for utilities inside the current City limits

It estimated that Sherwood's property tax and utility rate payers would take on the maintenance , repair and replacement (MRR) of an additional 72 miles of water, storm and utility lines and 26 to 34 miles of streets and roads associated with residential and commercial development. This is new infrastructure would be added to the existing 61 acres of parks, 59 miles of road and 215 miles of utility lines inside the existing City limits.

Sherwood's current combined operations and maintenance budget for maintenance, repair and replacement of its existing roads and utilities is $8.242 million per Sherwood's 2023- 24 budget. This would increase substantially with Sherwood West added to the city. Other public services, such as law enforcement, city administration, finance, planning, building inspection, etc. would also increase in proportion to land area and population.

Inflation: The general costs of construction and maintenance of public facilities and services are based on present day assumptions. They are subject to inflation and will be significantly higher in coming years.

Natural Resource Lands – Stream Corridors: The Sherwood West Concept Plan acknowledges that a significant part of the area is Metro Title 13 lands - stream corridors and riparian areas. This, and steep slopes and other development constraints, makes a significant part of the UGB expansion area difficult and expensive to develop.-However , Sherwood's plans do not make specific recommendations for these areas other than they would be set aside for open space and natural areas. How this will happen and/or what entity would be responsible for ensuring protection is not known. For example, will these lands be part of large estate type subdivisions and become common open space tracts subject to management by a property owners association? Alternatively, is it aspired that some or all this land be public and managed by a public entity? Regardless, these lands will require oversight and management to ensure natural resources functions and values are maintained and do not present hazards to surrounding areas, such as wildfire, flooding and landslide.

Tualatin River National Wildlife Refuge: The Sherwood West concept plan acknowledges the proximity of the refuge but makes no mention of potential impacts of Sherwood West or measures to mitigate them. This is an important issue that must be addressed when making the UGB expansion decision.

BACKGROUND AND METHODOLOGY FOR ASSIGNING ORDER OF MAGNITUDE COSTS

Three categories of infrastructure costs for the UGB expansion are generally quantifiable. The first is the UGB expansion's need for "foundational infrastructure." This is the set of public facilities - major roads, surface water management, water and sewer lines that, per Sherwood's consultants' assumptions, are needed to "catalyze" private development in

Sherwood West. This consists of the larger water, storage, conveyance and pumping systems, sanitary sewer collection, pumping conveyance system and major roads usually classified as major collector and arterial streets. The second cost category is related to the "development infrastructure" such as that needed to build a residential subdivision, apartments, industrial areas, etc. Once private development projects are completed and accepted, the city assumes ownership and long-term maintenance, repair and replacement costs. This is an important consideration because maintenance, repair and replacement (life-cycle costs) sometimes equal or exceeds the initial costs as facilities wear out and need replacement or remodeling over time. The final cost category includes public, but non-municipal, services. This includes things such as new elementary-and middle schools, public safety facilities (fire station) and needed improvements to Highway 99W. Fire stations and schools are not needed for development to occur but need to be realized because of development much like maintenance, repair and replacement of infrastructure.

How Would Roads and Utility Infrastructure in Sherwood West be Funded.
Infrastructure must be in place before development occupancy can occur. Local governments and sometimes state government require infrastructure to be provided either before, or in conjunction with the use or occupancy of new development. For example, a new residential subdivision that would increase the traffic capacity of a major collector street would have to pay for adding lanes, intersection improvements, traffic lights, etc. This requirement is in proportion to a development's impacts on the street's safety and capacity. The same principle applies to other facilities such as needed sanitary sewers and storm drainage and surface water quality systems.

In Oregon, system development charges (SDCs) are one of the ways through which developers pay their projects' proportional cost of needed major infrastructure and to reimburse local governments for their investment in existing utility systems This is one of the ways through which infrastructure will be funded in Sherwood West. The three primary sources of SDC revenue are City of Sherwood SDCS, Clean Water Services (CWS) regional connection charges (RCC)and surface water fees, and the Washington County transportation development tax (TDT). The Washington County major streets transportation improvement program (MSTIP) may also contribute by partially funding selected arterial street improvements .

All Infrastructure needed to serve specific developments, such as local streets, smaller water lines, and storm drainage are mostly paid for and built by developers to local government specifications. These costs, like SDCs, are rolled into the purchase, or lease price of property. They are in addition to SDC charges included in the cost of a new house. SDC costs in Sherwood are significant. For example, the current charge for single-family home is about $51,500.

Once infrastructure is completed, inspected and approved, ownership is assumed by the City, which guarantees its maintenance, repair and replacement over the long term.

Revenue for this comes from public utility fees and charges and property taxes. Larger replacement and maintenance projects, as happens when roads and utilities wear out, is often funded by capital reserve funds augmented by general obligation and revenue bonds and when available, state and federal assistance.

Parks and related facilities open space, and trails are considered infrastructure but, in most cases, the land is acquired, improved and retained by local governments. In the case of Sherwood West, development would be also subject to the city's Parks SDC.

The combined cost of all infrastructure, subject to systems development charges and other exactions charges such as permits, water connections and fees associated with the building process, are passed on to the consumer. This has a significant impact on the cost of new housing and other new development. In addition to SDCs, it's acknowledged that there are many other fees and charges are associated with building and engineering permits, inspections, water meter installations, planning review, permit administration, etc. These add up to significant costs depending on the scale and complexity of a project.

How Sherwood West Foundational Infrastructure Costs and Funding Gaps Were Determined: Sherwood's city engineering staff and its consultants prepared several order-of-magnitude cost scenarios based on a variety of land use mix scenarios These are part of Appendix O of the Sherwood West urban Growth Boundary Proposal – 2024. The latest estimates were done in February 2024. The cost of foundational infrastructure at that time was estimated to be $334.027million. Infrastructure costs and funding gaps are summarized by Tables 4 thru 6.

These examples show that the City of Sherwood's systems development charges are minor contributors towards meeting the costs of needed infrastructure, compared to Clean Water Services Regional Connection Charges (RCC) and Washington County's Transportation Development Tax (TDT). The one area where it may provide adequate funds is parks. In this instance the park funding may be enough to purchase the land but not develop it. However, though important, parks do not contributor to actual land development.

Table 4: Estimated Costs of Sherwood West Foundation Infrastructure by District -$Million

	Water	Sewer	Storm	Parks	Roads	Totals
North	10.75	18.16	10.93	23.43	72.85	136.12
Far West	8.37	4.80	2.76	0	26.92	42.37
West/ S. West	29.17	10.01	6.18	23.82	85.79	154.97
Totals	48.59	32.97	19.87	47.25	185.56	334.24

Table 5. Funding Gap Analysis all Districts – Low Density Housing (0%) Middle Housing- $ Million

Water	Sewer	Storm	Parks	Roads	Total w/ all Revenue)	Total w/City Only
-18.79	32.30 (surplus)	-14.57	7.93((Surplus)	-17.54	-10.65	-203.53

Table 6. Funding Gap Analysis all Districts – High Density Housing (20%) Middle Housing- $ Million

Water	Sewer	Storm	Parks	Roads	Total w/ all Revenue)	Total w/City Only
-9.37	39.98 (surplus)	-13.62	$23.90 (Surplus)	-10.04	30.78	-175.078

Notes:

- **Source: Sherwood West Concept Plan (Feb. 13, 2024, Memo from Leland Consulting Group to Eric Rutledge, City of Sherwood)**
- **Surpluses in one SDC Category cannot be used to address deficits in another**

The policy related financial issue the City must address is, how can it cover the above financial shortfall?" The Sherwood West Concept Plan recommends that the city consider funding sources such as supplemental or increased system development charges (SDCs), local improvement districts, city-wide increased utility rates, and urban renewal to partially pay for infrastructure.

There are disadvantages of all these methods. They would increase costs for development, thus making it less feasible and transfer some costs of UGB Expansion to existing Sherwood taxpayers and ratepayers.

Development Related Infrastructure Costs: Development projects such as single-family subdivisions, office parks, and multi-family projects pay for the construction of local streets and utilities that directly serve these land uses. Traditionally, these are usually two-way streets usually within 30' to 36' rights-of-way that include water, sewer, storm drainage/water quality infrastructure. Some jurisdictions allow smaller streets through master planned projects' such as planned developments. Street density is a valuable urban design tool to provide for walkable neighborhoods, especially in mixed-commercial/residential environments.

Some Industrial and commercial uses require larger streets constructed to accommodate large trucks. Most often industrial land uses have relatively low street density because uses typically require larger sites. Internal site circulation is often provided by easements that

meet standards for fire protection. Commercial land uses locate within high traffic volume areas most often front on major collectors and arterials for access and pay commensurate SDC's and or participate in the costs of road and utility construction.

Water and sewer utilities are most often in public rights of way. If not, they are within located within dedicated easements . These typically consist of eight-inch water and sewer line lines unless design and fire flows require greater capacity. Sometimes industrial and commercial will require greater fire flows hence water lines are often installed up to 10"-12." Local Storm drainage systems also must manage flows and water quality. This means the curb and gutter, catch- basin and pipe system is often augmented by vegetated in- street structures, vegetated swales and local water quality facilities. Within West Sherwood CWS regional water quality facilities will be needed. These are often constructed by development to CWS's specifications.

The following estimates were calculated based on acreages of land use scenarios assigned by the Sherwood West UGB Concept Plan's various land use scenarios. It is acknowledged that site design is a significant factor in the quantities of utilities needed and there will be differences in quantity and costs associated with actual development occurs.

A summary of estimated quantities of private development streets and utilities for the UGB Concept's Plans preferred land uses is shown by Table 5 below. It is a compilation of tables 6 through 9 that follow

Table 6 – Summary of Estimated West Sherwood Private Development Costs Per Sherwood West Concept Plan Acreage Allocations

SF (L/M/H) Middle Housing, Cottage Cluster	Acres	Streets K/L'	Sewer K/L'	Water K/L'	Storm K/L' (Equivalent)	Total Cost $ Million
	308	87.00	87.00	87.00	87.00	68.47
Muti-Family	33	7.87	7.87	7.87	7.87	7.05
Mixed Employment	130	18.48	18.48	18.48	18.48	18.84
Mixed Resident/Comm	25	8.5	8.5	8.5	8.5	8.50
Hospitality - Entertainment	63	15.75	15.75	15.75	15.75	15.68
Sub-Total	559	137.6	137.6	137.6	137.6	118.54

Notes:

- SF(L/M/H Density) Street Density = 20.7% of assigned land area.
- Multi-Family Steet Density = 17% of assigned land area
- Mixed Employment Street Density = 12% of assigned land area. Framework streets only would be developed. The site users would develop interior sites specific to their needs.
- Mixed Residential Commercia Street Density = 25% of assigned land area
- Hospitality/Entertainment Street Density = 25%+ of assigned land area

The acreage total above does not include the following:

- 40 acres for elementary and junior high schools,
- About 60,000 sq. ft (1.5 acres) acres for a new fire station
- Seven acres of commercial land that was not included for reasons explained below

- For the purposes of this analysis park acreage is distributed in the various land use districts and included as part of respective land use categories.

Table 6A: Single Family, Middle Housing , Cottage Cluster
Streets and Utilities – Estimated Development Costs $Millions

Streets	**87KL'**	**Sewer**	**87KL'**	**Water /L'**	**87KL'**	**Storm**	**87KL'**
$300/ L'	**$26.10**	**$170/L'**	**$14.790**	**$160L'**	**$13.920**	**$180L'**	**$15.66**
Grading, base, paving, sidewalks, etc.		Includes manholes and clean outs, etc.		Includes, hydrants appurtenances, vaults etc.		Includes manholes, catch, basins, etc.	

Table 6B: Summary Sherwood West Single Family Residential Street and Utilities Development Costs: ($Millions)

Streets	$26.10
Sanitary Sewer	$14.790
Water	$13.920
Storm	$15.66
Total	$68.470 Million

Notes:

- Residential Street Miles (Estimated). Street Connectivity is assumed to be between 200 -400 feet.
- Does not include accessory dwelling units because they most often share the same frontage as single-family housing
- Neighborhood Streets ROW is 28 – 36 feet in width. A general average of 32' in width was used for this analysis
- Sewers, water ,are considered 8" diameter. The storm drainage system is assumed be a combination of traditional and surface water quality systems and costs are estimated using an equivalent per lineal street length. Storm drain lines average 8"to 12" diameter. It is acknowledged that special circumstances will require exceptions. All utilities are within public streets or easements.

Table 7a: Estimated Development Cost of Streets and Utilities for Multi-Family Residential Development Streets and Utilities- 33 Acres

Streets	**7.87kL'**	**Sewer**	**7.87kL'**	**Water /L'**	**7.87kL'**	**Storm**	**7.87kL'**
$370/ L'	**2.92**	**$190/L'**	**$1.49**	**$170/L'**	**$$1.34**	**$180L'**	**$1.41**
Grading, base, paving, sidewalks, etc.		Includes manholes and clean outs, etc.		Includes valving, hydrants etc.		Includes manholes, catch, basins, etc.	

Notes:

- Development tracts range in size from .5 acre to five acres.
- Neighborhood Streets ROW considered to be 32 – 35 feet in width. Widths can vary to 24 feet for special applications and access. Steet connectivity is assumed to be in the range of 400' to 800 feet. Alleys are not considered in this analysis.
- Cost of streets serving multi-family development will be higher than SF residential due to intensity of traffic volumes, driveway access, signalization costs of possibility of turn refuges for access
- Typically, eight-inch diameter sewer lines are adequate but in case of high-density housing peak flows may be higher. Costs have been adjusted to reflect this.

Table 7B: Summary Multi-Family Residential Public Facilities Costs ($Millions

Streets	$2.92
Sanitary Sewer	1.49
Water	1.23
Storm	$1.41
Total	$7.05 Million

Table 8A. Estimated Development Cost of Streets and Utilities for Mixed Use Employment - 130 Acres - $Millions

Streets Cost	**18,480L'**	**Sewer Cost**	**18,480L'**	**Water /L' Cost**	**18.490 L'**	**Storm Cost**	**18,590L'**
$450/ L'	**$8.28**	**$190/L'**	**$3.5**	**$200/L'**	**$3.7**	**$180L'**	**$3.35**
(Grading, base, paving, sidewalks, etc.		Includes manholes and clean outs,		.Includes fire hydrants		Includes manholes, catch, basins, etc.	

Notes:

- Variety of lot sizes two to 15 acres that could accommodate single to multiple tenancies/users with full frontage streets. Proposed arterial streets previously identified will account for half of required frontage.
- Heavy industrial uses are not considered, but some freight traffic and warehousing will occur.
- Interior streets will occur associated with development need, but no minimum connectivity is assumed.
- Public access and delivery drives will be provided. Fire lane and emergency access will be responsibility of users

Table 8B: Summary Estimated Development Costs of Streets and Utilities for Mixed Use Employment (Millions $)

Streets	$8.28
Sanitary Sewer	$3.51
Water	$3.7
Storm	$3.35
Total	$18.84

Table 9A: Estimated Development Costs of Streets and Utilities for Mixed Residential - Commercial Employment - 25 acres

Streets Cost	**8.5Kl'**	**Sewer Cost**	**8.5kL'**	**Water Cost**	**8.5kL'**	**Storm Cost**	**8.5Kl'**
$450/ L'	**$3.82**	**$170/L'**	**$1.45**	**$200/L'**	**$1.7**	**$180L'**	**$1.530**
Grading, base, paving, sidewalks, etc		Includes manholes and clean outs, etc.		Includes valves, fire hydrants.		Includes manholes, catch, basins, etc.	

Table 9B: Summary of Estimated Development Costs of Streets and Utilities for Mixed Use Employment - 25 acres (millions)

Streets	$3.82
Sanitary Sewer	$1.45
Water	$1.7
Storm	$1.53
Total	$8.500

Table 10A: Estimated Development Costs of Streets and Utilities for Hospitality District 63 Acre ($Millions)

Streets Cost	**15.75k L'**	**Sewer Cost**	**15.75KL'**	**Water Cost**	**15.75kL'**	**Storm Cost**	**15.7hkL'**
$450/ L'	**$7.01**	**$170/L'**	**$2.68**	**$200/L'**	**$3.15**	**$180L'**	**$2.84**
commercial Street Standards		Includes manholes and clean outs, etc.		Includes valving, hydrants. Increased fire flows addressed by 10" lines.		Includes manholes, catch, basins, etc.	

Table10B: Summary Development Costs of Streets and Utilities for Hospitality District 63 Acre (Millions)

Streets	$7.01
Sanitary Sewer	$2.68
Water	$3.15
Storm	$ 2.84
Total	$15.68

Neighborhood Commercial – Seven acres

A public facility needs, and cost analysis of proposed Neighborhood Commercial land uses was not done because Neighborhood Commercial land uses as proposed do not typically require public utilities more than single or multi-family land uses. These uses will most likely be located on developed major streets and often adjacent to employment zones. Therefore, it is reasonable to propose that seven acres of neighborhood commercial will most likely utilize existing major roads for access and public facilities and services. Identifying and costing out those facilities would be duplicative.

Other Infrastructure/public Services

Sherwood West will require other kinds of public services in addition to those provided by the city. The Sherwood West Concept Plan proposes that elementary and middle schools will be needed. Per the UGB Concept Plan these uses will require about 40 acres of land - 15 and 20-acres respectively. These schools would also likely draw students from surrounding area.

Schools: The Sherwood West UGB Expansion plan assumes two schools; an elementary and middle school would be required. If 40 % percent of Sherwood West 4,000 + households or 1,600 homes would consistently have children under the age of 18, then each school would need to accommodate 750 students each. This also assumes some enrollment from other areas. The cost of these schools is estimated to $66.78 million per Tables 11 and 12 below.

Table 11: Sherwood West Elementary School Estimated Costs

Elementary school building cost per sq. foot (2024	Sq. feet Needed per student	# of estimated students	Costs -$Millions
$240	70	750	$12.60 - Building
Land Acquisition - 15 acres at $700K developable acre			$ 10.50 – Land
Site Work - parking grading and utilities and play fields			$ 2.52 – Site Work
System Development Charges			$ .96 – SDCs
Street frontage Improvements and Utilities			$ .56 – Streets and Utilities
		Total	$27.10

Table 12 Sherwood West Middle School Estimated Costs

Middle school building cost per sq. foot (2024	Sq. feet Needed per student	# of estimated students	Costs
$230	100	750	$17.25 - Building
Land Acquisition - 25 acres at $700K developable acre			$17.50 - Land
Site Work - parking grading and utilities and fields			$ 3.45 – Site Work
System Development Charges			$ .92 – SDCs
Street Frontage Improvements and Utilities			$ .56-Streets and Utilities
		Total	$ 39. 68

Transportation frontage and utilities costs were calculated using $800 per lineal foot assuming a 700- foot frontage per school. It should be noted that systems development charges might be reduced if these projects are on the major street system. This because SDC credits often are granted if the developer constructs needed improvements. SDCs that are applicable to schools are those levied by City of Sherwood, Clean Water Services and by the Washington County - Transportation Development Tax

Sherwood West Fire Protection and Public Safety Facility: Serious consideration should be given to the need to provide additional fire and life safety services through a dedicated emergency services facility in Sherwood West, should it urbanize. The closest facility is Station 33 at 15440 Oregon St., Sherwood. Currently , it is unlikely for fire and emergency response times to much of the proposed UGB Expansion to meet the National Fire Protection Agency response standards. In addition to safety concerns this could substantively increase fire insurance premiums for much of the area. Table 13 below summarizes the anticipated cost of a new public safety facility in the area.

Table 13: Sherwood West Public Safety Facility Estimated Costs

Building cost per sq. foot (2024	Building Size	Costs – Millions $
$1,000	5,000 sq.	$5.0
Land Acquisition: Min. 1.5 +(-) acre		$1.0 Land
Site Work - parking grading and utilities and fields		$ .25– Site Work
System Development Charges		$ Not Specified
Street Frontage Improvements and Utilities		$ Utilize Existing Streets
Total		$ 6.25 (Minimum)

Traffic impacts of Sherwood West would significantly impact State Highway 99W. ODOT will significantly control access to Highway 99W. The state's interest is to ensure the capacity of the Highway is maintained and ultimately a grade separated connection(s) will be required. Planning for Sherwood West has identified either one or two connections will be required. Preliminary cost estimates by the City of Sherwood about is about $8.6 million for one undercrossing.

Table 14: Summary of "Other" Needed Public Services Cost - Millions

Elementary School	$27.10
Middle School	$39.68
Public Safety Facility (Fire Sub-station)	$ 6.25
State Hwy 99W Crossing	$ 8.6
Total	$81.63

High local, county and service district (Clean Water Service) system development charges (SDCs) will have big impacts on the cost of development. The following Tables 15, 16 and 17 are examples of SDC's that would apply to residential development

Table 15: City of Sherwood, Clean Water Services (CWS) Washington County System Development Charges Applicable Single Family Residential Development (Per Unit) Including Small Lot

Jurisdiction	Water SDCs	Sanitary Sewer	Storm Water/ESU	Parks	Transportation	
Sherwood	$10,154	$1,032	$1,639	$17,256	$2,251	$32,332.00
CWS		$7,009	$ 678			$ 7,687.00
Washington Co.					$11,478	$11,478.00
Total	$10,154	$8,041.00	$2,317.00	$17,256.00	$13,279	$51,497.00

Notes:

- **Water SDC is calculated using a 5/8" – ¾' Meter. Charges include $123 per meter inspection fee**
- **Sanitary Sewer is measured in EDU of 150 gallons per day Engineers estimate applies to other uses**
- **ESU is a city defined measurement of impervious of surface.**
- **Clean Water Services Regional Connection Fee (RCC) is collected by Sherwood. The city retains 4% and 96% is remitted to CWS.**
- **Storm water quality rates are set by CWS.**
- **Small lot detached single family (middle housing will be assessed impact fees the same as large lot single family.**

Table 16: City of Sherwood, Clean Water Services (CWS) Washington County System Development Charges Applicable to (Town Home) Common-Wall Single Family Housing

Jurisdiction	Water SDCs	Sanitary Sewer	Storm Water/ESU	Parks	Transportation	
Sherwood	$10,154	$1,032	$1,639	17,246	$1,347	$31,418.00
CWS		$7,009	$ 678			$ 7,687.00
Washington Co. TDT					$6,866	$ 6,866.00
Total	$10,154	$8,041.00	$2,317.00	$17,256.00	$8,213	$45,971.00

Table 17: City of Sherwood, Clean Water Services (CWS) Washington County System Development Charges Applicable to a 50-unit Apartment Building. (SDCs = $33,623 per unit

Jurisdiction	Water SDCs	Sanitary Sewer	Storm Water/ESU	Parks	Transportation	
Sherwood	$175,548	$ 51,624	$81,950	$535,300	$77,400	$921,822.00
CWS		$350,450	$33,900			$384,350.00
Washington Co. TDT					$375,000	$375,000.00
Total	$175,548.00	$402,074.00	$115,850.00	$535,300.00	$452,400	$1,681,172.00

- **Water SDC is calculated using a 3" Meter. Charges include meter inspection fee**
- **Sanitary Sewer is measured in EDU of 123 gallons per day Engineers estimate applies to other uses**
- **ESU is a city defined measurement of impervious of surface.**
- **Clean Water Services Regional Connection Fee (RCC) is collected by Sherwood. The city retains 4% and 96% is remitted to CWS.**
- **Storm water quality rates are set by CWS.**
- **Small lot detached single family (middle housing will be assessed impact fees the same as large lot single family.**

File: Ron 4 amended infrastructure Sherwood MKM Comments West Infrastructure Funding Final Draft

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VINEYARD

22075 SW Lebeau Road
Sherwood, Oregon 97140

503.652.1978

ALLOROVINEYARD.COM

Testimony
to the Metro Council
September 26, 2024
In Opposition to West Sherwood UGB Expansion

Topic: Absence of any alternative to the Sherwood UGB Expansion proposal

For the record My name is David Nemarnik. My Address is 22075 SW Lebeau Road, Sherwood OR 97140

I farm grapes and hazelnuts on our family's 262 acres including land directly adjacent to to the Sherwood West Expansion area.

I am a supporter of the West of Sherwood Farm Alliance.

The Alliance's analysis of what could be developed on the vacant land area inside the city of Sherwood – the Brookman Area and the Tonquin Employment Area- shows that Sherwood alone has enough vacant land to meet any need for additional housing and jobs for the region and for Sherwood itself. Please read our two Analysis documents, Sherwood Vacant Lands Capacity for (1) Employment and (2) Housing, and the associated large investment in infrastructure needed. The analysis also documents a thoughtful and well-reasoned approach that accommodates Sherwood's growth through 2044 without expanding the UGB.

Why did the Alliance have to do this work and not your staff?

Your staff never bothered to consider and propose to you an alternative for your consideration. The only alternative they considered was Sherwood's proposal, which was developed to serve Sherwood's needs, or rather the needs and desires our Mayor and City Council consider important.

This is part of a pattern of Metro focusing all the attention on UGB expansions in Washington County, as if the needs of communities in Multnomah and Clackamas Counties are irrelevant to the region's future.

The Metro Council has a responsibility to consider regional needs from a regional perspective, and not passively respond to a proposal from one city in a region with 24 cities and parts of three counties.

Please direct your staff to give you one or more alternatives to consider, to compare, and contrast with the Sherwood proposal.

Draft of Testimony
to the Metro Council
September 26, 2024
in Opposition to West Sherwood UGB Expansion

Topic: Justification based on housing need contradicted by tbe state's, Metro's and Sherwood's own housing need analyses and facts about housing costs.

Madame President and Councilors, good morning.

My name is TROY WILLIVER.

I live [describe general location.] SHERWOOD, OR 97140 - LEBEAU RD.

I am a supporter of the West of Sherwood Farm Alliance.

The Chief Operating Officer has recommended adding 1,291 acres to the UGB based on this land's supposed contribution to meeting the region's need for affordable housing.

This justification is contradicted by Sherwood's own clearly expressed preferences for expensive market-rate low-density single-family housing.

At the Metro Technical Advisory Committee meeting on August 28 (starting around minute 23) Sherwood's Planning Director ,Eric Rutledge, made it very clear that the base density range for their housing forecast was 6.2 homes per acre.

He said the city would reject a condition requiring an average density of 16 units per acre, which would mean, according to him, that one-half of the new housing would be middle housing.

6.2 homes per acre means single family homes on 5,000 to 6,000 square foot lots.

The homes currently for sale on lots of 5,000 to 7.500 square feet are priced on Zillow at between $535,000 to $800,000. According to Zillow the average home price in Sherwood is $637,000.

Assuming you are willing to pay 30% of your pre-tax income housing you would need a household income of at least $140,000 to afford a $637,000 house. The US Census reported that as of 2022 the median family income in the Portland Vancouver region was a bit less than $90,000.

According to multiple online source average rents in Sherwood are $2,000 to $2,500. Households earning $90,000 or more could afford $2,000 month but not $2,500.

How does the Sherwood West Concept Plan's proposal for low-density single-family housing square up with Sherwood's own 2019 Housing Need Analysis? It doesn't.

This month the Oregon Department of Administrative Services issued its draft statewide Housing Needs Analysis which includes draft goals for the Metro region and Sherwood; 44% of the region's new housing and 56% of Sherwood's must be affordable to households with 80% or less of the median family income.

So where does this leave the one-half of residents of the region with average or below average incomes?

Well, certainly not in Sherwood.

If you are serious about making housing more affordable you must reject the staff recommendation.

Thank you.

372 words: 124 words per minute.

NAIOP
COMMERCIAL REAL ESTATE DEVELOPMENT ASSOCIATION
OREGON CHAPTER

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August 22, 2024

The Hon. Lynn Peterson, President
Metro Council
600 NE Grand Avenue
Portland, OR

RE: 2024 Urban Growth Report

Dear President Peterson and Councilors:

NAIOP, the Commercial Real Estate Development Association, is one of the leading organizations for developers, investors, owners & operators, brokers, and related professionals in office, industrial and mixed-use real estate throughout the United States, Canada, and Mexico. The Oregon Chapter's members represent a broad and diverse range of companies involved with commercial real estate activities in the Portland metropolitan area, including developers, owners, brokers, and managers, along with other professionals providing legal, finance, title, engineering, architectural, construction, and other services.

Thank you for the opportunity to comment on the draft 2024 Urban Growth Report which is a crucial element in planning for the future of commercial development in the region. Our testimony will focus on two areas:

- Strong support for the boundary expansion proposed by the City of Sherwood which includes our unequivocal endorsement of the findings and conclusions presented by EcoNorthwest in its *Sherwood West UGB Assessment* document found in Appendix 9;
- Concerns with the UGR's estimates of supply and capacity of industrial land

I. Support for Sherwood West UGB Expansion Proposal/Endorsement of EcoNorthwest Findings and Conclusions

NAIOP Oregon member representatives have been involved in Sherwood's planning process for the Sherwood West area for more than two years, and we very much appreciate the extensive time and effort the City has devoted to careful development of a plan that will provide much needed additional land for employment and housing. The Sherwood West Concept Plan includes land for housing, schools and civic facilities, park space, and 265 net acres for employment uses that would support about 4,500 new jobs. We strongly endorse the findings of ECONorthwest that this area has regionally

unique characteristics that would be very attractive to industrial development, including 40-to-50-acre parcels, minimal site aggregation, slopes under 5 percent, and access to Interstate 5.

Our industrial market members have long been well aware of ECONorthwest's finding that, unlike in the office and retail markets, vacancy rates for the industrial sector in the region are below 5%. This is an extremely low number and, with continuing strong demand for this type of space, has spurred a more than 20% increase in industrial rents over the last five years. These two trend lines are even more pronounced within Washington County, where the vacancy rate dipped to 2.5% in 2023 and rents increased 23%.

As ECONorthwest found, "A diverse regional market supply of sites is essential to maintaining an equilibrium in market pricing and to supporting a broad range of industries." Without such a supply, the Portland metropolitan region will be unable to compete with other national markets and will be passed over by employers looking for new locations and expansion opportunities.

The Sherwood West area fulfills this need quite well with its unique set of features as listed above by the ECONorthwest analysis. Also, it should be noted that Sherwood West is within an acknowledged Urban Reserve that was designated 14 years ago after an intensive public process to identify and compare parcels most suitable for UGB expansion and future urbanization. Expansion of the UGB to include Sherwood West is a logical and appropriate next step to ensure that the region is able to satisfy regional industrial land needs for the next twenty years.

II. Concerns with the UGR's estimates of supply and capacity of industrial land

A. Slopes and Parcel Size. According to the UGR, there are currently 5,950 acres of buildable industrial land within the region. This number, however, seriously overstates the realistic development potential for these lands since it includes properties with slopes of up to 25%, which is much steeper than is acceptable for industrial uses (the 25% slope standard is derived from Oregon Administrative Rules specifically pertaining only to residential land). A more accurate approach would be to use the acreage for "unconstrained" parcels shown on Table 5 of Appendix 6 which deducts those areas where 10% or less of the taxlot is up to a 7% slope. This amounts to 2,839 acres, but is also problematic since the average parcel size is 1.05 acres, much smaller than is typically seen for industrial development.

According to data from CoStar, since 2018 there have been 137 industrial buildings constructed within the UGB and Clark County. As shown in the table below, those 137 buildings had 21,834,448 total square-feet of net rentable area, with a total land area of 1,678 acres.

New Industrial Construction 2018-24 Within Portland UGB and Clark County, Washington	
Total Building Net Rentable Area	21,834,448 sq. ft.
Total Land Area	1,678 acres
Average Building Size	159,376 sq. ft.
Median Building Size	105,986 sq. ft.
Average Land Area	12.25 acres
Median Land Area	8.44 acres

As can be seen from these numbers, the average and median land area size of 12.25 and 8.44 acres for industrial developments over the last six years is far larger than the 1.05 acre average lot size seen in Table 5 of Appendix 6 in the UGR. This disparity is further reinforced by data presented in ECONorthwest's Sherwood West UGB Assessment (Appendix 9 of the UGR) regarding the size of industrial buildings constructed. According to the report, "Between 2019 and 2023, 7 million square feet of industrial buildings (sized 100,000 square feet or larger) were developed in the region across 33 buildings. This indicates that 39 percent of the industrial buildings built between 2019 and 2023 equal or are greater to 100,000 square feet, which shows the trend towards new industrial companies needing larger spaces."[1]

We would urge the Council to direct staff to develop recommendations for further reductions in projected industrial land capacity after taking into consideration the steep slopes and the extremely small average taxlot size of the buildable industrial acreage.

B. Projected Infill Industrial Development. A further problem with the 5,950-acre total amount of buildable industrial land is that 3,252 acres (55%) are projected to come from infill development of sites that are already considered developed. Only 2,574 acres (43%) are actual vacant, undeveloped sites. The infill projection is very aggressive for such remnant parcels and begs the question of what the historical rate of industrial infill has been.

We urge the Council to direct staff to produce this information so that it can be compared with projections for the future.

Thank you for the opportunity to comment on the Urban Growth Report and we appreciate the outreach efforts of your staff to brief in responding to our questions. Please let us know if we can provide any additional information.

Sincerely,

Kelly Ross
Public Affairs Consultant

[1] *Sherwood West UGB Assessment,* ECONorthwest, Urban Growth Report Appendix 9, page 8.

To: Metro Council President Peterson
Metro Councilor Ashton Simpson, District 1
Metro Councilor Christine Lewis, District 2
Metro Councilor Gerritt Rosenthal, District 3
Metro Councilor Juan Carlos González, District 4
Metro Councilor Mary Nolan, District 5
Metro Councilor Duncan Hwang, District 6

CC: Marissa Madrigal, Chief Operating Officer, Metro
Kristin Dennis, Chief of Staff to Metro Council
Catherine Ciarlo, Director of Planning, Development and Research, Metro
Malu Wilkinson, Deputy Director of Planning, Development and Research Metro
Eryn Kehe, Land Use Manager, Metro
Ted Reid, Land Use Manager, Metro

September 26, 2024

1000 Friends of Oregon appreciates the opportunity to participate in the Urban Growth Stakeholders Roundtable, comment on the urban growth report, and partner with Metro on multiple areas of alignment such as unlocking more funding for critical infrastructure needs, addressing our housing affordability crisis, and bringing more mobility options for Oregonians in a 2025 transportation package.

1000 Friends of Oregon urges Metro Council to help this region avoid a pitfall by working with subject matter specialists to (1) narrow down the proposal to only include lands zoned residential immediately adjacent to the existing UGB and (2) adopt enforceable affordability conditions.

If the City of Sherwood or Metro Council do not agree to specific and enforceable housing quantity, diversity, and affordability conditions, we urge Metro Council to reject this expansion proposal altogether for the good of the region.

We come to this conclusion for two reasons: (I) our region has a surplus of available land, vacant buildings, and redevelopment opportunities inside our existing UGB and (II) the City of Sherwood's proposals fails to demonstrate how this 1,291 acre expansion helps Metro Council achieve its six desired outcomes: vibrant communities, sustained economic competitiveness

and prosperity, safe and reliable transportation choices, leader on climate change, clean air, water, and healthy ecosystems, and equity.[1]

I. Metro Council should reject the current proposal because our region has a surplus of available land, vacant buildings, and redevelopment opportunities inside our existing UGB.

An urban growth boundary decision requires all of us to first ask and answer: do we need to expand our UGB for population or job growth? Based on data from Metro staff and recent inventory updates the answer is no. We have over 500,000 parcels of land inside the existing UGB, multiple industrial sites of all sizes including at least two 500-acre sites, and we're suffering from a 24% region-wide vacancy rate in our commercial buildings, not including shadow space (where a building is leased on paper, but employees are not using the building regularly). Colliers International shares a bleak forecast for the future of commercial leases, noting that this is the 17th consecutive quarter of increasing vacancy rate in the greater metro region and that a significant amount of leases are coming up for renewal/expiration. We are suffering from a 33% vacancy rate in Portland's Central City alone

On September 18, 2024 Governor Tina Kotek announced a public hearing to be held on October 10, 2024. The hearing is "to discuss a proposed determination by the Governor to bring identified lands into the urban growth boundary near Hillsboro, OR subject to the authority granted to the Governor in Senate Bill 4(2023), Section 10."[2] This possible additional 373 acres of industrial land to the existing UGB adds more reason to reject the expansion based on the surplus of available industrial land inside the region.

Given the surplus of available land, especially industrial and commercial lands, vacant and underutilized buildings, and redevelopment opportunities, this expansion is unwarranted. Metro Council should reject this expansion proposal on this data alone.

II. Metro Council should reject this proposal because the City of Sherwood's proposals fails to demonstrate how this 1,291 acre expansion helps Metro Council achieve its six desired outcomes: vibrant communities, sustained economic

[1] Metro Council. Six desired outcomes. Adopted 2008; Accessed on Metro's website on September 25, 2024: https://www.oregonmetro.gov/six-desired-outcomes
[2] Governor Tina Kotek. September 18, 2024. https://www.oregon.gov/biz/Publications/CHIPS/Public_Meeting_Notice_SB4_Lands.pdf

competitiveness and prosperity, safe and reliable transportation choices, leader on climate change, clean air, water, and healthy ecosystems, and equity.

In 2008, Metro Council adopted six desired shared outcomes. These outcomes serve as the region-wide vision for all of us - local governments, private companies, and non-profit organizations - to develop strategies, direct resources, and organize board of directors, employees, and community members to make progress toward these six desired outcomes. We hold the proposal up to these six desired outcomes:

Does the proposal help create vibrant communities? Depends on who you are and where you live, work, and play in the region.Vibrancy - in urban planning - describes the experience of urban and suburban environments: the livability, the attractiveness, and the diversity. The City of Sherwood has proposed a concept that includes elements that would be nice for some people, but the infrastructure required to build these elements pulls resources away from other parts of the region that have been waiting for basic infrastructure investment for decades. Vibrancy - at a regional scale - requires effective and efficient use of existing and new infrastructure to revitalize and redevelop these areas. Development and redevelopment using existing infrastructure allows us to accomplish this much faster and with bigger impact because the limited public infrastructure dollars go further and benefit more communities.

Density is also required for vibrancy. You cannot create compact, mixed use, walkable neighborhoods at 6.2 units per acre; even the COO's suggestion of 9.2-13.4 units/acre is not enough. These densities would, it seems, not even qualify for Metro's own housing bond funding for affordable housing projects. The absolutely lovely and needed projects built to date around the region with these funds are north of 24 units/acre (more than double the current density averages discussed). The proposal, thus, could create a vibrant community in a small, remote part of the region but at the expense of revitalizing other areas that more people experience.

Does the proposal help the region achieve sustained economic competitiveness and prosperity? No. Given the surplus of available industrial land inside the UGB (sites of all sizes) and high vacancy rates and underutilized commercial buildings (23% vacancy-rate region-wide), any additional industrial and commercial land as part of the proposal would enable companies to either relocate from their existing leases within the region or skip over existing leasing or development opportunities that are closer to existing populations, infrastructure, and amenities.

Does the proposal create safe and reliable transportation choices? No. The proposal perpetuates the current set of transportation choices. The Oregon Department of Administrative Services just-released Oregon Housing Needs Analysis Draft Methodology concludes that Sherwood has inadequate transit access to jobs - the lowest in the region.[3] According to Redfin, Sherwood is car-dependent with minimal transit. The expansion proposal does not include conditions for density levels that can justify transit extensions and frequent service (in contrast to the City of Tigard's River Terrace 2.0 approved in Metro's UGB swap; a swap we supported with conditions).

Does the proposal help the region be a leader on climate change? No. We are not aware of an analysis done by Metro or City of Sherwood staff to determine if this expansion proposal is consistent with Metro's Climate Smart Strategy required to meet the state's greenhouse gas emission reduction targets or Climate Friendly Equitable Communities rulemaking[4][5]. But, 1000 Friends of Oregon can analyze anticipated greenhouse gas emissions from the road extensions associated with the expansion to conclude the proposal undermines Metro's or the City of Sherwood's ability to meet goals outlined in the Climate Smart Strategy or CFEC. While the urban growth expansion plan's infrastructure needs are vague (for example, the local collector streets and costs are not addressed), a reasonable approximation of infrastructure needs include 26 - 34 miles of roads associated with residential and commercial development. Currently, Washington County has approximately 425 lane miles of class 2 and 3 facilities on which 1.6 billion vehicle miles traveled per year. This proposal - assuming the conservative 26 miles - would induce an additional 59 to 89 million vehicle miles traveled per year. Under today's conditions, the annual emissions from this increase would be .4 MMTCO2e to .9 MMTCO2e. This increase translates to approximately 8,100 more passenger cars or light trucks on the road or 4 million gallons of gas each year.[6]

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[3] Oregon Department of Administrative Services, Oregon Housing Needs Analysis Draft Methodology, p. 32 and table 12.

[4] The Climate Smart Strategy, adopted by Metro Council in 2014, fulfills a 2009 mandate by the Oregon Legislature, requiring Metro to develop and implement a strategy to reduce the region's per capita greenhouse gas emissions from cars and light trucks at least 20 percent by 2035.House Bill 2001 (2009)Oregon Senate Bill 1059 (2010). https://www.oregonmetro.gov/climate-smart-strategy#:~:text=The%20Climate%20Smart%20Strategy%20fulfills,least%2020%20percent%20by%202035.

[5] The greenhouse gas reduction target for the Portland Metropolitan area is 20% reduction by 2035 and 35% reduction by 2045, with annual targets. Annual greenhouse gas emission reduction targets for the Portland Metropolitan Area are found in OAR 664-004-0020. https://oregon.public.law/rules/oar_660-044-0020

[6] Shift. Calculated using Sherwood West urban expansion plan. September 25, 2024. https://shift.rmi.org/

In addition, the densities suggested in the COO Recommendation or Sherwood's response will not support adequate transit service in the future.

Does the proposal help the region steward clean air, water, and healthy ecosystems? No. The proposal expands development in and onto farms, forests, and watersheds. The area includes the National Tualatin Wildlife Refuge, a regionally significant habitat (designated by Metro). Metro's staff analysis notes that, at the least, development would have a moderate impact to this regionally significant habitat and, that is assuming, an effective Title 13 program, particularly for the uplands habitat.[7]

Does the proposal advance racial equity? No. The proposal threatens any progress made toward making an equitable region by pulling planning dollars and future infrastructure funds away from other areas of the region. Current and historical trends demonstrate that areas most likely to lose out on funding to Sherwood are areas with low-income communities and communities of color. These communities still suffer from lack of public and private investment: no sidewalks, dedicated bike lanes, parks, nature trails, tree canopy, and more.

The proposal does not include strategies or conditions in the proposal to make Sherwood more equitable: affordable housing set-asides or funding or staffing plans. A 1,291 acre expansion is too large of a request without any guarantee that Sherwood will be able to make itself a more inclusive, equitable community. The Oregon Department of Administrative Services just-released Oregon Housing Needs Analysis Draft Methodology indicates that Sherwood's 20-year housing need consists of 395 homes for income levels at 0-30% area median income (AMI), 279 homes for income levels at 30-60% AMI, 169 homes for income levels at 60-80% AMI, and 238 homes for income levels at 80-120% AMI. The current proposal fails to account for how the City of Sherwood is going to meet this 20-year housing need within their existing UGB let alone this expansion.

***

This process and pulse check is valuable. It is critical that we understand the true problems in order to revitalize our region and set the next generations of residents up for success. This forecast and data submitted by local governments and the private sector - tell us that space - or the availability of raw land - is neither the problem nor the solution for our region. Instead, we

[7] Metro. Sherwood North Urban Reserve Area. 2018. https://www.oregonmetro.gov/sites/default/files/2018/12/03/SherwoodNorthUrbanReserveMetroCodeAnalysis.pdf

should focus inside our UGB on policy and funding and financing solutions. We can, and must, work together on a shared agenda for creating state and federal priorities to address our issues on land readiness, housing affordability, commercial-to-residential conversions, and tax reform.

***

We are ready to assist Metro Council and/or the City of Sherwood narrow down the expansion and develop enforceable affordable housing conditions to create an innovative approach to how we plan for today's needs and a better future for all of us. My email is Sam@friends.org and my phone number is (503497-100.

Sincerely,
Sam Diaz
Executive Director

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Friday, September 13, 2024 8:08 AM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#253]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Adrienne Stacey
Email *	adriennestacey@mac.com
Address	3434 SE Brooklyn St Portland, OR 97202 United States
Your testimony	Metro started with a stellar approach to protecting land from ruin. We must continue to take this all around winning approach. We are in the middle of transitioning our thinking to include more than human needs. Be our leader Metro. Do it right, do it strong.
Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, September 25, 2024 3:07 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#268]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name * Alexandra Brown

Email * abrown5@drhorton.com

Your testimony

Dear Metro Council Members,

I am writing to express my support for the proposed expansion of the Urban Growth Boundary (UGB) to include the Sherwood West Plan. As a resident of the Portland metro area and a previous member of the Sherwood Planning Commission, I recognize the need for thoughtful and strategic planning to accommodate the region's growing population and to ensure that our communities remain vibrant, livable, and sustainable.

The Sherwood West Plan represents a significant opportunity to address the housing shortage in our region by creating a well-planned community that provides a mix of housing options, including affordable housing for families, seniors, and first-time homebuyers. Expanding the UGB to include this area will allow for the development of necessary infrastructure, parks, and other community amenities that support a high quality of life for residents.

Furthermore, the plan's focus on preserving natural resources and open spaces aligns with the values of environmental stewardship that are important to our region. The careful integration of green spaces, trails, and conservation areas within the Sherwood West Plan will help to maintain the ecological balance and provide recreational opportunities for all residents.

In addition to meeting housing needs, the Sherwood West Plan has the potential to stimulate economic growth by attracting businesses and creating jobs within the community. With a well-designed transportation network that enhances connectivity, this development will contribute to a more balanced and equitable distribution of economic

opportunities throughout.

I believe that the expansion of the UGB to include Sherwood West is a necessary and forward-thinking step to ensure that the Portland metro area can continue to grow in a sustainable and inclusive manner. I urge the Metro Council to approve the UGB expansion and support the implementation of the Sherwood West Plan.

Thank you for your time,

Alexandra Brown

Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, September 12, 2024 10:02 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#252]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Andre Fortin
Email *	afortin85@gmail.com
Address	2015 SE Grant St 2015 SE Grant St Portland, Oregon 97214 United States
Your testimony	Do not expand the current urban growth boundary!
Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, September 25, 2024 2:03 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#267]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Anna Maria Ponzi
Email *	maria@amponzi.com
Address	19675 Southwest Seiffert Road Sherwood, OR 97140 United States

Your testimony

Dear Metro Council:

I'm writing in opposition to the City of Sherwood's westside expansion proposal. I grew up and now live in the Scholls Sherwood area and have watched the impact of the never-ending sprawl coming onto our precious farmland. While open land looks inviting to development, I urge the council to take a greater perspective of the long-lasting effects of these dangerous moves.

Many who do not work the land, like I do, are often disconnected to it and take it for granted. Obviously, development in farmland not only depletes our rare and rich soils forever, but presents tremendous pressure on farmers to do their jobs. Safety is a key concern of mine as I observe daily how slow moving farm equipment must now compete with high-speed commuters on our rural roads. This expansion would only impede the ability of farms and vineyards to operate as we have for centuries. Moreover, this expansion would pave over regionally significant fish, wildlife habitat and vital woodlands.

The region currently has a surplus of vacant warehouses, strip malls, outlet centers, and office space around the region. I am a firm believer in using all available property before paving over farmland that will never return. Food production is not a sure-thing, we have to continue to support it and protect it.

In its current form, the Metro Council would be failing its responsibility to steward the region's vision and achieve its six desired outcomes if it approves the proposed expansion:

1. “People live, work and play in vibrant communities where their everyday needs are easily accessible.

2. Current and future residents benefit from the region's sustained economic competitiveness and prosperity.

3. People have safe and reliable transportation choices that enhance their quality of life.

4. The region is a leader on climate change, on minimizing contributions to global warming.

5. Current and future generations enjoy clean air, clean water and healthy ecosystems.

6. Equity exists relative to the benefits and burdens of growth and change to the region’s communities.”

I encourage the Metro Council to strongly consider the long-term impacts of this decision and oppose the expansion.

Thank you.

Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, September 26, 2024 10:04 AM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#271]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Christina Simonton
Email *	csimonton@gmail.com
Address	8710 SW Curry Dr. Unit C Wilsonville, OR 97070 United States

Your testimony

For the record, my name is Christina Simonton. Council President and Council Members, I am a resident of Wilsonville, however I have worked in Sherwood/ Wilsonville for the past 25 years and consider myself a patron and part of each community. I speak on behalf of myself and my neighbors who are wanting to see growth and developement in Sherwood that will benefit the community and bring in thoughtful decisions for both commerce and city planning. I would consider both Wilsonville and Sherwood to be ripe for thoughful planning as they are communities experiencing current growth and needs for expansion. These are desirable communitites for living, raising famalies, and woven communities. We are in need of business that is NOT commerical/ corporate chains. We need to allow for local business owners to have a chance to thrive. I have seen first hand city mismanagement happen Wilsonville, leaving that community devoid of community businesses that help the community thrive. I travel to neighboring states (ID and WA) and see local creative and community small businesses thriving. Oregon needs to open up channels for local creative and community businesses to have a chance to come to vision too. Our communities are desparate for it. You have entrapeaurs and business developers here and now, ready to move forward with their visions and I ask that Metro support this chance for growth. Over two years of throughful planning and community support has gone into the deveopment of restaruants and community gathering spaces in Sherwood West that will bring in jobs as well as add a quality of living to the community. Thank you for your time today.

--Christina Simonton

Is your testimony related to an item on an upcoming agenda? *	Yes

Commissioner Carmen Rubio
City of Portland

September 25, 2024

President Peterson and Metro Council
Metro
600 NE Grand Avenue
Portland, OR 97232

RE: 2024 Urban Growth Report

President Peterson and Metro Council,

The City of Portland appreciates the opportunity to provide feedback on the Urban Growth Report and the Sherwood West Concept Plan. We recognize that extensive effort went into developing the Concept Plan, including engagement with both current residents and members of the development community, as well as the staff time that went into developing the Urban Growth Report.

We appreciate the Metro COO/Staff's recommendations on the proposed UGB expansion and the focus on desired goals/outcomes as the basis for developing potential conditions. We offer the following suggestions on how to add more specificity, and in some cases strengthen, the recommendations:

Additional recommendations proposed by Metro staff to inform future planning efforts

- Directing Metro staff to identify amendments to Title 11 of the Urban Growth Management Functional Plan to **require equity assessments** and **consultation with tribal governments** when planning for new urban areas.

  Recommendation: In addition to these two important changes, this work should also include requiring assessments related to carbon emissions and climate resilience.

- Directing Metro staff to undertake a planning process to **renew/update the Future Vision and the 2040 Growth Concept**.

  Recommendation: We agree that the time to start this important work is now.

Conditions of approval for UGB expansion

We appreciate the extensive planning effort that has been undertaken by the City of Sherwood to craft the concept plan for this area. We understand the practical need for those planning efforts to focus on local desires, however believe the plan – as proposed – does not adequately consider regional goals.

As such, we have concerns with the decision to expand the UGB to include the Sherwood West urban reserve and encourage Metro Council to ensure that this regional decision addresses regional goals and policies by applying sufficient conditions to ensure that the buildout of the area meets the intended purpose.

As suggested by the COO/Staff's recommendation, we think it would be appropriate for Metro Council to adopt conditions:

- **Housing Target**

  Consistent with past Metro practices, including all four expansion areas in 2018, Metro Council has adopted specific housing targets for UGB expansion areas.

  BPS has previously expressed technical concerns about the underlying UGR. We are concerned that the UGR has a mismatch between the income profile of 2044 households and the housing type mix of future households. The 2044 household forecast has only 20 percent of households with incomes greater than $150,000. Yet, the future housing mix allocates 33 percent to single dwelling detached houses. In today's housing market, a household earning $150,000 per year can only afford a $300,000 home. Given those market realities, there should be more emphasis on middle housing types to match the future household income profile.

  The City of Sherwood has committed to planning for 3,111 units (9.2 units/acre). This target is too low with too much land devoted to single dwelling detached houses on 10,000+ square foot, large lots.

  The City of Sherwood's own analysis shows that a modest increase in the middle housing development rate to 20 percent of single dwelling lots could achieve **a target of 4,100 units** (12.0 units/acre). This target better matches the future household income profile of the region.

  Recommendation: Establish a housing target of 4,100 units for the Sherwood West urban reserve.

- **Housing Affordability**

  We are concerned about the lack of emphasis on creating more affordable housing types in the Concept Plan. We recognize the challenges in providing a significant number of publicly-financed, deeply affordable housing at the edge of the region. However, there are opportunities to facilitate other types of lower-cost housing options. As we shared at the Sept 11 MPAC meeting, we think **a greater emphasis on middle housing types** (which would be achieved through a higher housing target) can create lower cost homeownership opportunities and open up the possibility of partnerships with non-profit organizations to create affordable homeownership that would be appropriate to this area.

  This increased focus on middle housing would also be consistent with the state's draft regional housing forecast that shows the need for an additional 20,000 units that are affordable to middle income (81-120% AMI) households over the next 20 years.

  Recommendation: Ensure that relatively lower-cost, middle housing options are available by incorporating the higher housing target recommended above.

- **Industrial Land Protections**

  The Urban Growth Report found an overall surplus of industrial capacity with a shortage of large lot industrial sites. We think the UGR is overestimating the supply of industrial land and support future efforts to **take a closer look at our industrial land supply** to ensure that it is sufficient to enable regional economic growth and prosperity.

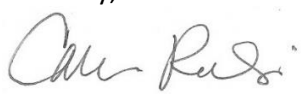
  We support **adding this new industrial area to the UGB for large lot industrial use**.

  We are concerned that the City of Sherwood's regulations for industrial zones are not sufficient to ensure that this area will be used for large lot industrial uses envisioned in the concept plan. Examples of potential inappropriate uses – that do not sufficiently advance our regional employment needs – include country clubs, mini-golf, RV storage, and garden nurseries.

  Recommendation: Designate this area as a Regionally Significant Industrial Area (RSIA) on Metro's Title 4 map, in order to provide a higher level of protection than the Industrial designation. In addition, the update to the Vision and Growth Concept (mentioned above) should include a regional dialogue to evaluate our industrial land supply and ensure that it is sufficient to meet our region's needs.

Thank you again for the opportunity to provide input.

Sincerely,



Carmen Rubio
Commissioner, City of Portland

President Lynn Peterson and Metro Councilors,

Thank you for the opportunity to speak to you all about Sherwood's urban growth proposal. My name is Saerom Yoo and I co-chair the Committee on Racial Equity with Temmecha Turner. We are 13 BIPOC, immigrant and refugee community members convened to advise Council on matters that impact racial equity in our region.

CORE was asked to weigh in on the UGB process after a primarily white stakeholder roundtable of subject matter experts and industry leaders was convened. A few of our members plus others were hastily added to the roundtable and what followed was an arduous journey for those of us who hold racial equity as a core value.

While we have submitted recommended conditions of approval in writing, we believe the process is just as important — if not more so — than the outcome. We're sharing our observations and recommendations today in hopes Metro will capture the lessons learned through this process and formalize new best practices in the future. We would appreciate an update within 3 months on how the Council has decided to incorporate our feedback into future Metro decisions

Our Takeaways

The UGB process tokenized CORE and other people of color. While we're grateful that CORE was invited to weigh in on the UGB process, it was immediately clear that racial equity was an afterthought. As volunteers who meet for one two-hour meeting per month, we felt rushed to properly understand the topic, Sherwood's plan and analyze its racial equity impacts.

CORE members and other people of color who were invited to the roundtable felt unwelcome and dismissed. They immediately noted a lack of data justice, but their questions and concerns were disregarded. CORE feels strongly that without data justice, we cannot make data-based decisions on racial equity. This is why we've also submitted a recommendation on how Metro can implement data equity/justice, specifically.

There was little to no connection between the UGB process and Metro's Strategic Plan to Advance Racial Equity, Diversity and Inclusion and Climate Smart Strategy. CORE members and other volunteers felt as though there was a large and substantial gap between Metro's codified, 106-page commitment to the implementation of racial equity and how we experienced the UGB process, a critical and substantial project that will impact the region for decades. The group's experience of the UGB process largely did not reflect any sort of consistent and intentional dissemination of the tenets of the SPAREDI — in project management, community engagement or involvement or data equity. Metro staff presenting on a subject also did not articulate any sort of incorporation of SPAREDI goals.

In CORE's interactions with the city of Sherwood staff, we were again surprised to observe such little consideration for racial equity, diversity and inclusion. Subject matter experts seemed to think the UGB is purely about land. Yet land has repeatedly been used to kill, abuse, exploit and marginalize Black, Indigenous, Latinx, Asian and Native Hawaiian and Pacific Islander people in our history. As a committee, we have not observed that Metro or Sherwood understands the seriousness of this history and the real threat of repeating it.

Our Recommendations

- Bake racial equity and inclusion criteria into current and future processes from the beginning, using them to guide decision-making, determine key partners and social impact.
- Train and educate every Metro staff member so they understand the historical and ongoing racial equity impacts of their department.
- Evaluate Metro data to ensure data justice.
- Evaluate Metro's methodologies in creating inclusive environments for community engagement and update best practices.
- Invest proper resources and time to allow thoughtful engagement with groups like CORE, while minimizing harm and loss of trust.
- Commit to authentic and accountable community engagement based on trust and relationships.
- Respect and accept community members' lived experience as real expertise.
- Avoid manufactured urgency and tokenization.
- Above all, center human impact. Land use is never just about land.

Conclusion

Councilors, thank you again for the opportunity to speak about a UGB process that stands to impact our region's communities for decades. We hope that our reflections can support you in building a future Metro where racial equity is intentionally centered — rather than an afterthought — in future public decision-making processes. We are available and eager for ongoing conversations in the spirit of continued growth and learning.

CORE Committee Recommendation Form

Date Presented: September 26, 2024

Title of Recommendation:
Recommendation to Enhance Equity in the Urban Growth Boundary (UGB) Process

Submitted by:
CORE Committee Members: Joseph Sullivan, Marcia Perez, Tristan Penn

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Summary of Recommendation:

The CORE committee recommends that Metro leadership implement the following equity-driven actions in the Urban Growth Boundary (UGB) decision-making process. This recommendation is based on extensive feedback from CORE members, who have expressed concerns regarding data equity and inclusive language in UGB-related communications.

Body of Recommendation:

1. **Recommendation 1: Develop a Framework for Data Equity and Justice**
    - **Concern:** The absence of a structured framework for ensuring data equity and justice in the UGB process limits the ability to make informed and fair decisions affecting marginalized communities.
    - **Suggested Action:**
      Metro should commission an expert in data equity to develop a comprehensive framework that addresses how data collection, analysis, and reporting will account for racial and social equity. This framework should guide future UGB decisions and be developed well in advance of the next cycle to ensure thorough implementation.
2. **Recommendation 2: Collaborate More Intentionally with the Metro DEI Department**
    - **Concern:** The language and framing of UGB-related documents and communications are not consistently reviewed through an equity lens, which could alienate or exclude underrepresented communities.
    - **Suggested Action:**
      Metro UGB staff should establish an ongoing collaboration with the DEI Department to ensure that all public-facing materials and internal communications are equity-centered. This includes a formal content review process, where DEI staff provide input at every major milestone.

3. **Recommendation 3: Provide Consistent Professional Development on SPAREDI**
    - **Concern:**
      Staff across departments may lack the necessary training to understand how race and equity principles intersect with their work, particularly in data analytics and large-scale projects like UGB.
    - **Suggested Action:**
      Metro should implement ongoing, practical professional development centered on SPAREDI, showing staff how to apply racial equity principles to their daily work, data analysis, and presentations. The success of the first two recommendations relies on the consistent application of this training.

How does this recommendation address barriers to equity?

Developing a data equity framework and ensuring inclusive language in all UGB-related communications will ensure that the voices of historically marginalized communities are considered and that their concerns are addressed. By embedding equity into these processes and into the minds of those at Metro who work closely with analyzing, interpreting, and making sense of data, Metro will be more effective in creating, recommending, and making informed and inclusive fair urban planning policies.

How does this recommendation improve outcomes for marginalized communities?

By integrating data equity and the expertise of the DEI Department, the UGB process will become more transparent and accessible to communities of color, low-income residents, and other underrepresented groups. It will also demonstrate that their processes are truly more than one-dimensional "racial equity community engagement" practices, but rather, practices that drill down on a data analytics level where there are missing pieces of racial justice. This will help build trust and ensure that growth decisions benefit all communities equitably.

How were marginalized communities engaged in shaping this recommendation?

CORE committee members representing diverse communities have actively participated in the UGB process and provided insights that informed this recommendation. Their feedback reflects a commitment to enhancing the participation of marginalized communities in future UGB processes.

Resources and Data:

- Feedback collected during UGB committee meetings
- Data Justice Lab- https://datajusticelab.org/about/

To: Metro Council

From: Committee on Racial Equity (CORE)

Date: September 25, 2024

The Committee on Racial Equity (CORE) is sharing its recommendations on the proposed Urban Growth Boundary expansion proposal. Our committee of volunteer community members recognizes the importance of the Urban Growth Management Decision. This expansion decision will impact our community's growth for decades to come.

In this decision, we see that our community's future is not measured only in terms of acreage, housing units, and jobs. Our community's future is also marked by how much community members have shaped how they want to see their future.

CORE's recommendations below address both this year's expansion request, as well as considerations for more expansive community engagement in future UGB processes. We've also prepared separate recommendations that address larger concerns regarding the environment Metro facilitated throughout the UGB process — in hopes that the full agency can adopt more inclusive and rigorous standards in the near future.

Ultimately, this package of communications to Metro Council are a result of a uniquely in-depth engagement from CORE. Multiple subgroups committed additional time to attend roundtable meetings and advocate for more meaningful engagement with CORE. We appreciate your attention to our insights and hope that they catalyze change.

CORE's engagement on UGB:

- **March 2023**: Staff presents an overview of the Urban Growth Management Decision
- **Nov 2023:** Staff joins CORE meeting with invitation to join UGB Roundtable.
- **Jan-July 2024:** Two CORE affiliated members participate in monthly UGB Roundtable meetings and report back at each CORE meeting.
- **Jan 2024:** Three CORE members attend a UGB 101 session with staff.
- **Feb 2024:** Staff presents UGB 101 to CORE.
- **April 2024:** CORE holds a committee member only discussion about their role and about their experiences to date. COO joins to listen.
- **June 2024:** CORE prepares for discussion with the City of Sherwood.
- **July 2024:** City of Sherwood joins CORE meeting to share expansion request.

- **August 2024:** CORE drafts recommendations to Council.
- **September 2024:** CORE reviews input from COO, public comment, Youth Cohort. Finalizes recommendations to Council.

Following this substantial time investment from CORE, here are our recommendations on the city of Sherwood's expansion request, as well as for future UGB processes:

Recommendations on current proposal:

- Conduct a community needs assessment with a regular community feedback loop around public amenities and community services, such as parks, healthcare, and transportation needs.
    - Based on the information from these community needs assessments, adopt a continuous improvement approach that includes a community oversight body, to assess response and progress on community needs assessment.
- Conduct community engagement activities in the region's most spoken languages other than English (including Spanish, Vietnamese, Chinese, Russian, Korean, and Arabic) and in Sherwood (including Spanish, Arabic, Vietnamese, Japanese, and Russian) with proactive and culturally specific outreach strategies to under-engaged communities.
- Partner with culturally and linguistically specific organizations within the local community to design a community engagement plan, conduct outreach, and other activities in order to fulfill community needs assessment work described above.
- Develop a housing plan that includes mixed levels of affordability that correspond to regional and state housing goals. Align housing affordability with salaries of projected new jobs.
- Analyze history of communities that have been excluded in Sherwood, including the proposed expansion area. Understand how communities have moved throughout time and the trends and data in community displacement. Create a reparations plan that centers the voices of people from displaced and marginalized communities and shares the economic benefits of the proposed expansion with historically displaced communities.

Recommendations on future UGB processes:

- Require future urban growth expansion applications to include racial equity assessments.

- Metro should adequately support and fund racial equity consultation.
- Require future applicants to convene a compensated and racially diverse community oversight committee to inform decision-making that produces just and equitable outcomes.

Thank you for the opportunity to submit our recommendations and your commitment to racial equity in the Metro region.

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Monday, September 23, 2024 9:56 AM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#263]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Dan Hoyt
Email *	hoyt100@gmail.com
Address	Portland
Your testimony	Here are my questions: How will this expansion reduce burning fossil fuel? How will adding houses in exurbia reduce congestion? How will adding less than 1% to the housing stock of the region make any difference in prices? We know suburbanization has poor outcomes and the market for homes close in neighborhoods is strong, why not redevelop giant surface parking close in?
Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Saturday, September 21, 2024 5:53 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#259]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Dan Hoyt
Email *	hoyt100@gmail.com
Address	Portland
Your testimony	We have decades of experience with suburban sprawl. The outcome is terrible on many levels. Let's stop doing the things that give us terrible outcomes! The City of Sherwood has a poor reputation regarding sprawl. Rather than more mistakes in Sherwood. Metro should phase-out giant surface parking lots and leverage the infrastructure and services already built by redeveloping with structured parking and mixed use development.
Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Sunday, September 22, 2024 11:29 AM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#260]

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Name *	Dennis Christen
Email *	art827@msn.com
Address	18201 SW Edy Road Sherwood, OR 97140 United States

Your testimony

Hello METRO Council Members,

My name is Dennis Christen, Trustee and owner, with my brothers, of my parents property at 18201 SW Edy Road in Sherwood. My parents Louis and Bertha are both deceased as of years ago.

This is a small farm, just under 10 acres that my parents bought back in the 60's. It sits within the Sherwood West boundary.

Currently I rent the farmable acreage to the Harvey Brothers, local farmers and they grow and harvest a different crop each year. Currently the field is planted in wheat. Last year it was clover and oats the year before that. The Trust receives $500.00 a year from the Harvey's in rent money, nothing off the crops. The Harvey brothers do a very nice job with the field and their crops always make the field look nice, my father worked with them years ago. So we, the Christen family are not really farmers, we just own the land. This farm sits on very flat land, rare for Sherwood West and has housing developments to the south and east. Thus ideal land for future housing development.

I am writing in support of METRO including Sherwood West into the UGB during your meetings later this year.

Sherwood needs to grow and develop this land for a number of reasons. 1) Affordable housing, there is a lack of affordable housing for families moving to the area, along with retirees. 2) More families would help the enrollment at the very large Sherwood High School just off Hwy 99 and within the Sherwood West boundary. 3) Increase the number of houses paying property taxes to the city and the costs, the bonds for the schools. 4) Job growth. 5) Parks. 6) Commercial businesses along Hwy 99. 7) And it's long overdue.

I appreciate your time and know this is an important decision. Also know that a number of neighbors in the Sherwood West area support, the going forward on the UGB expansion.

Sincerely,

Dennis Christen

Trustee

Is your testimony related to an item on an upcoming agenda? *	Yes

WESTSIDE ECONOMIC ALLIANCE

President Peterson and Metro Council
Metro
600 NE Grand Avenue
Portland OR 97232

September 24, 2024

Dear President Peterson and Metro Councilors,

Westside Economic Alliance thanks you for this opportunity to share this testimony. We urge Metro Council to adopt a high-growth projection for population, housing and all employment lands. We also encourage Metro Council to support the City of Sherwood's expansion request.

Westside Economic Alliance is in our 26th year of working to create a vibrant and accessible economy for our region. We represent business, public-sector partners and non-profit organizations. It is this blending of perspectives that allows us to focus on issues like the Growth Management decision with a well-considered approach. We believe that we can both lean into economic opportunity and continue to create a region, and a state, where livability is centered. We support our businesses as they seek to grow regional prosperity through workforce training, expansion, and economic opportunity.

As noted in our previous testimony to COO Madrigal, it's important that we begin with the population estimates on which so much of this report rests. The early conclusion of the draft report is that regional growth is slowing because Oregon's birth rates are among the nation's lowest. Given this, the report correctly concludes that net in-migration will be the primary driver of regional population growth. The report goes on to state, "Slowing population growth also means slower job growth."

What the report fails to state clearly is that if net in-migration will be the primary source of regional population growth then our region's, and our state's, housing and economic future will be overly dependent on well-thought policy decisions that encourage growth.

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City of Tualatin

Westside Economic Alliance continues to encourage the Metro Council, to adopt high growth population forecasts for our region. It is far better to plan for growth and not see it realized than it is to plan for decline adding pressure that could result in economic stagnation or another housing crisis. Adopting the high-growth population forecast will give Metro and the local jurisdictions more flexibility to meet our communities' needs and should be viewed as a prudent public policy decision.

EMPLOYMENT LANDS

According to the Urban Growth Report, Metro staff have forecasted a surplus of Industrial land supply with a current capacity of 5,950 acres and a 20-year projection of a surplus of between 450 and 7,450 acres. However, the report also highlights some of the realities on the ground that act as major detractors to the current capacity estimate: in particular slope and lot size.

Over the course of the Urban Growth Report roundtable, we heard from developers that Oregon Revised Statute applies the definition for "buildable land" for residential construction to commercial and industrial land. As such, we learned that slopes of up to 25% are considered legally "buildable" for the purposes of all employment land, yet commercial and industrial developers say they will not consider land buildable with more than a 7% slope grade. When challenged on this, staff identified 1,300 acres with a slope greater than 10% that were counted within the buildable land inventory.

We are pleased that COO Madrigal recommended this amended slope. It confounds us why it took until 2024 to address this issue and ask Metro Council to direct staff to meet directly with industrial developers to identify other areas where staff assessment of available and buildable land do not align with the realities of effective and safe industrial development.

An additional concern with the gross figure of 6,000 acres of 'surplus' industrial land is lot size. According to the Urban Growth Report the average lot size is 3.8 acres with a median lot size of 1.7 acres. Given the overabundance of small sites and the fact that the current vacancy rate for industrial land is below 5 percent across the region, the reality is that the vast majority of this acreage could not be used to serve the industrial market.

We recommend that Metro Council direct staff to work with industrial developers and others to identify a minimum lot size that is realistic for effective industrial development. Any lots below that lot size should be removed from the overall land supply calculation.

INDUSTRIAL LAND AVAILABILITY AND SB4 LAND

As mentioned in the draft Urban Growth Report, the data and analysis of industrial land supply is not the only information that the Council may consider when determining whether there is a need to expand the Urban Growth Boundary. They may also consider whether there is a regional need for industrial sites with specific site characteristics such as larger sized sites.

The Oregon Semiconductor Task Force recommended that in order to be competitive over the next 5-10 growth cycle, the state needed to identify the following development ready sites:

- Two (2) sites of 500+ acres for advanced R&D or production fabrication operations
- Four (4) sites of 50-100 acres for device manufacturers or equipment manufacturers
- Eight (8) sites of 15-35 acres for key suppliers to the ecosystem

And while this site list is a statewide recommendation, we know that industries will often create clusters. Indeed, in EcoNW's report (Appendix 9) they note:

> The semiconductor boom in the 1990s was precipitated by the state having 2000 acres of industrial land, which led to billions of dollars of investment and doubling the industrial employee count.
>
> To prepare for the next influx of semiconductor activity, the region will need to have a supply of industrial land to support business growth and expansion. The Semiconductor Task Force's Industrial Lands Subcommittee found that the key site characteristics that the semiconductor prefers is a location near other semiconductor businesses and labor, parcels of at least 25 acres, and sites that have infrastructure in place to support development that can begin within 6 months to three years. The subcommittee identified a lack of land that met these criteria.

And, as noted on pages 55-56 of the Urban Growth Report:

> [T]he Metro Council established the following policy in the Regional Framework Plan:
>
> '1.4.6 Consistent with policies promoting a compact urban form, ensure that the region maintains a sufficient supply of tracts 50 acres and larger to meet demand by traded-sector industries for large sites and protect those sites from conversion to non-industrial uses.'
>
> Since the 2017 update of the Regional Industrial Site Readiness inventory of large industrial sites, 15 large industrial sites have developed. Six of the sites that developed are over 50 acres in size. There are ten remaining sites over 50 acres inside the UGB. Of those, two sites have marine or airport use restrictions, leaving eight sites over 50 buildable acres inside the UGB that are available to the general industrial market.

And so, the Semiconductor Task Force, the EcoNW Report and Metro's own policy recommends additional land of at least 25 acres with a push to identify 'sufficient supply of tracts 50 acres or larger' to meet the industrial needs of the region. And yet the overwhelming majority of vacant industrial land is LESS THAN 25 acres. There is an imbalance in acreage lot size availability and without a recommendation to discount acreage too small for real industrial development, Metro Council could stagnate the region's ability to leverage generational federal and state investment potential.

Given the Governor's recent decision to move forward with a supersiting effort, and given the information provided by the Semiconductor Task Force, EcoNW's report and Metro, we urge the Council to consider the 373 acres as an additive, rather than as a replacement for, an Employment Land expansion in the Growth Management Decision.

We urge Metro to consider the generational investments that may be lost should the Governor provide the extraordinary opportunity of a regional supersite for semiconductors but the region is unable to support that work due to a lack of available mid-size lots needed for a healthy cluster. We emphasize again that the Governor's authority under Senate Bill 4 is a separate and altogether different consideration for Metro Council as regards the City of Sherwood's expansion request.

CITY OF SHERWOOD EXPANSION PROPOSAL

We enthusiastically and without reservation support the City of Sherwood's request for expansion. While Metro may want to make recommendations or provide incentives to encourage certain kinds of growth, we trust the rigorous public engagement process that Sherwood has already conducted and trust that they will continue to engage their community to understand how to grow reasonably and responsibly.

As the Council considers your recommendation to staff, we urge you to keep in mind the diversity of communities across our region. WEA represents two counties, 15 cities and multiple special districts, most of whom have their own elected leadership who are on the ground, day in and day out, meeting the needs of their communities.

We encourage Metro to continue to engage in the process guided by the City of Sherwood and their residents, allowing local jurisdictions to grow in a way that best reflects the community they are working with their residents to create.

CLOSING

Westside Economic Alliance on behalf of our members, ask **Metro Council to lean into a Growth Management Decision that is aspirational**. Throughout the region we are hearing alarm bells going off that our growth in the coming decades will be reliant on in-migration.

- In-migration can be super charged through smart policy choices.
- Job growth can be ramped up through smart policy choices.
- Land readiness can be increased through smart policy choices and investments.

Adopting a high growth population scenario is the first step to unlocking the potential for smart regional policy and investments that will help our region's employers and local jurisdictions realize economic growth and prosperity.

Thank you for your time and commitment to the growth of our region.

Sincerely,

Elizabeth Mazzara Myers, Executive Director

Cc:
Ashton.Simpson@oregonmetro.gov
Christine.Lewis@oregonmetro.gov
Duncan.Hwang@oregonmetro.gov
Gerritt.Rosenthal@oregonmetro.gov
JuanCarlos.Gonzalez@oregonmetro.gov
Mary.Nolan@oregonmetro.gov

9/25/24

Dear Metro President Peterson and Council,

I am writing to support the City of Sherwood's **Urban Growth Boundary (UGB) expansion proposal**. This year, Sherwood is the only city making this request, and the impact could be significant: **4,000 good-paying jobs**, around **3,000 new homes**, and hundreds of acres of parks and natural areas.

The plan developed by staff, regional stakeholders, and community members is thorough and equitable. We applaud this outcome and strongly encourage Metro to approve the full **1,291 acres** without conditions. Adding conditions could undermine the extensive public outreach and jeopardize critical funding for the project.

Bringing new lands into the UGB requires careful planning and an environment supportive of growth. Sherwood is ready for this, having engaged the community in developing an innovative plan for complete, livable neighborhoods. Conditions proposed in recent discussions could have serious political repercussions and risk hundreds of thousands of dollars in grants. Given the severity of our housing crisis and the opportunities for economic development, the Sherwood West proposal is a prime example of planning that can benefit our region for generations. It will aid in achieving housing production goals while supporting our local economy.

For these reasons, we believe the Sherwood West proposal is a smart plan that deserves the community's support and a unanimous vote from the Council.

Thank you for your consideration.

Eric Peterson
Vice President
Brookfield Properties
Developer of Reed's Crossing, Hillsboro OR

.

HOME BUILDING ASSOCIATION
OF GREATER PORTLAND

August 22nd, 2024

Marissa Madrigal, COO
Metro
600 NE Grand Ave.
Portland, OR 97232

Cc:
President Lynn Peterson
Councilor Ashton Simpson
Councilor Christine Lewis
Councilor Duncan Hwang
Councilor Gerritt Rosenthal
Councilor Juan Carlos Gonzalez
Councilor Mary Nolan

RE: Metro's 2024 Urban Growth Report and Sherwood's Urban Growth Boundary Expansion Request

Dear Ms. Madrigal,

My name is Preston Korst and I'm the Director of Government Affairs at the Home Building Association of Greater Portland. HBA is dedicated to maximizing housing choice for all who reside in our region by shaping an environment in which industry professionals can meet the diverse needs of all communities.

I'd like to start off by personally thanking you and the rest of Metro's planning staff, including Katherine Ciarlo, Eryn Kehe, Ted Reid, Malu Wilkinson (and many more) for hosting and facilitating the Urban Growth Report Stakeholder Roundtable. This broad and diverse group of interested parties met for two hours monthly for nearly a year to discuss and debate the central tenants of the Urban Growth Report (UGR) and the impacts it will have on our region. As HBA's representative in that group, I can say that it provided much needed dialogue and reflection space for us to discuss how we as a region wish to grow. Your willingness to provide that opportunity is greatly appreciated.

In this letter, we hope to outline our industry's perspective on the 2024 Draft UGR and to provide our unequivocal support for the City of Sherwood's Urban Growth Boundary (UGB) expansion request.

For housing affordability and the overall health of our economy, HBA and many others in the housing industry urge your COO Recommendation and Metro Council to take a high-growth position when evaluating our region's land supply and housing needs in this UGR and move to approve Sherwood's UGB request without conditions.

Consider for a moment the exorbitant costs to purchase a home in our region. According to Zillow, the median home sale price in June was $521,133 (Multnomah County), $579,979 (Washington County), and

$631,000 (Clackamas County). Staggering as these figures are, they come as no surprise given that Oregon is staring down a housing deficit of 140,000 units. And if our goal is to advance economic justice and racial equity, then we must reverse these trends in a way that builds wealth and increases homeownership opportunities for more families who've traditionally been locked out of the homebuying market. In other words, WE ARE IN A HOUSING CRISIS.

- -

UGR Question #1: Which population and growth projections should Council make?

With the UGR, we believe that the focal and starting point rests primarily on the population and growth scenarios presented in the report. While the draft contains a lot to applaud—including acknowledgements of an existing regional housing shortage, changing housing choices due to the pandemic, and the creation of newly allowed middle housing options—it still includes elements that are concerning for our industry.

For one, the report concludes that regional population growth is slowing because birthrates are dropping (which of course is an established national trend). This means that in-migrating residents will be the primary driver of our population growth, as it has been in recent years. This analysis makes sense. However, the report erroneously assumes that, "Slowing population growth also means slower job growth." We respectfully disagree.

Though we concur that we can't necessarily change what the data tells us, we *can* choose policies that will bend the precision of that data towards a stronger economic future. In other words, if we use this growth report to prepare for strong economic and housing growth, we believe that in-migration will adapt towards a higher-opportunity future—if you build it, they will come. On the flipside, if we plan for anemic growth and limit our ability to adapt to the market, we'll just be realizing our own economic stagnation. In either case, it's a self-fulfilling prophesy.

UGR Recommendation #1: assume and position the report with the high-growth population scenario.

We feel that Metro would not only be wise, but would be making the most responsible public-policy decision to plan for growth, despite what projections may or may not suggest. Preparing with an attitude of a high-growth scenario provides Metro and local jurisdictions with more flexibility to plan for the future that will avoid future housing crises and economic stagnation. As we hear often from planners: *failing to plan is planning to fail*.

- -

UGR Question #2: How should Council approach housing need and development scenarios?

To start, we want to acknowledge the fact that Metro staff included in this report an existing housing shortage of 23,700 units. While many in the housing industry would argue (with additional sources) that number is considerably low, it is still an important indication of how serious our housing crisis is to Metro. Moving on from there, we appreciate the difficult work that went into calculating our housing needs over the next 20 years. And we believe it would be misleading, if not negligent, to suggest that our region's housing needs are anything except *high*. Therefore, **we urge Metro to adopt the high-forecast housing need of at least 203,200 units over the next 20 years**. This reflects a greater sense of reality than the baseline or low-point figures hold.

Additionally, in the report, Metro also makes assumptions about not only the rate of our growth, but also *how we will and should grow*. Found on pages 38-39, the report contains several assumptions for development potentials using "illustrative demand and capacity scenarios." While we aren't exactly sure which data these trends were founded upon, we do feel that they all but marginalizes and unduly prevents the construction of new, single-family homes for residents. It assumes, either through economic reality or lifestyle choices, that our region's historically strong demand for homeownership isn't a viable scenario going forward. Again, we disagree.

And importantly, just after the limited scenarios are presented, the report goes on to say that "…it will be the market, not Metro's UGR calculations, that determine what mix of middle housing and single-unit detached housing gets built…" Yet, in the way that the housing needs scenarios are presented, Metro is essentially asking its Council to do just that by attaching to their decision a condition and outcome which will essentially select which types of housing should get built. Housing construction is a market-driven industry, with the overwhelming majority being built by private developers. We believe that it is not within Metro's power or provision to attempt to guide the mix of housing the market will bear, least of all with just four narrow scenarios.

UGR Recommendation #2: Metro should adopt a high-forecast housing need. Also, it should reject the growth scenarios presented in the UGR or establish an additional scenario that creates flexibility for the housing market to adapt to the demand of consumers.

A high need scenario reflects the reality on the ground and will allow policymakers across the region take actions that will address the high cost of housing in their communities. Also, we believe that the forecasted development scenarios have been created despite the fact that nearly 4 out of 5 Oregonian's still prefer to live in a single-family home versus other housing types. And it fails to recognize the power that public-policymaking has on the creation of new housing, which could make single-family entry-level homes more affordable. Lastly, it ignores the fact that the vast majority of homeownership opportunities lie in the single-family market. We believe that Metro should consider that our region's collective desire to foster equity and economic justice will rely on the unique wealth and community-building opportunities that arise with homeownership.

City of Sherwood UGB Expansion Request

This year, the City of Sherwood is the only city requesting a UGB expansion—and we believe that it would have a tremendous impact on our region, in the form of 4,500 good-paying jobs, roughly 5,000 new homes, and the creation of hundreds of acres of parks and natural areas.

For almost two years, I had the pleasure of sitting on the Sherwood West Technical Advisory Committee which helped shape the concept planning for the area. I can say without reservation that the plan brought forward by staff, regional stakeholders, and community members has been careful, conscientious, and equitable. **We applaud the delivered outcome and encourage Metro to move forward with an approval that encompasses the entirety of the 1,291 acres as requested, *without conditions.***

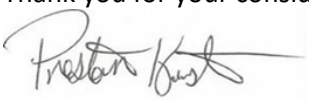
As Metro knows well, bringing new lands into the UGB requires focused planning, financing for infrastructure, and a building environment that can support growth. Fortunately, Sherwood is primed for just that. Over the last several years, the city has undergone extensive public engagement to develop a plan that is innovative, forward-thinking, and contains a variety of tools that will create complete and livable communities. However, adding conditions as suggested in a recent Council Session, could be

detrimental to that extensive outreach. There are serious political costs to adding conditions, not to mention the hundreds of thousands of dollars in grants and general fund dollars would be jeopardized if onerous restrictions are placed on this community-led design.

Given the continued severity of our region's housing crisis, mixed with the budding opportunities to capitalize on historic investments for local economic development—HBA and our partners in the housing sector view this request as a great example of a planning process that will bear fruit for generations. It will help empower our region to reach its housing production goals while creating an indispensable lifeline to a struggling local economy. For affordability and the overall supply of housing, the Sherwood West proposal is an undeniably smart plan that deserves the community's support and Council's unanimous vote.

In closing, we would like to thank Metro staff and Council for the dedicated service they offer to our communities. From long-range planning to affordable housing development, the work you do is not easy and the stakeholder groups you engage are broad and not always agreeable. We appreciate the efforts taken to develop the 2024 Draft UGR and to review Sherwood's 2024 UGB Expansion. And we implore you to consider the serious housing crisis we are facing when making your ultimate recommendations and decisions.

Thank you for your consideration of our testimony,



Preston Korst
Director of Public Policy and Government Affairs
Home Building Association of Greater Portland

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, September 19, 2024 10:58 AM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#258]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Hella Betts
Email *	hella@cascadewestern.com
Address	2729 SE 6th Ave. 19525 SW Kruger Rd – behind High School PORTLAND, OR 97202 United States
Your testimony	What land owners are not told by this group is that they do not need to sell only that lands are not worth as much as it would be if it was within the UGBV and City limits. With the ageing farmers would they not want value for their property!
Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Monday, September 16, 2024 10:39 AM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#256]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Jeanne Roy
Email *	jeanneroy62@gmail.com
Address	6805 SW 12th Ave. Portland, OR 97219 United States

Your testimony

Hearing on the Region's Urban-Growth-Management Decision

The proposed westside expansion in the Sherwood, by allowing developers to create sprawling, expensive homes, strip malls, data centers, and warehouses, would neglect real opportunities to increase housing where infrastructure already exists. It would also exacerbate climate change, harm vital habitat, and increase air pollution,

Another westside expansion would result in urbanizing more than 1,200 acres of valuable farmland, woodlands, and watershed that would compete against our region's backlog of maintenance needs and redevelopment potential. The infrastructure required would significantly deplete the limited amount of land-readiness dollars we have.

The region currently has a surplus of vacant warehouses, strip malls, outlet centers, and office space. By adding even more commercial land and buildings, regional employers would be enticed to relocate from the center to the edge of the UGB, as just happened with US Bank. This would make it more difficult to redevelop the inner core where plenty of infrastructure already exists.

The expansion would result in expensive housing out of reach for most residents at a time when we desperately need to

build affordable housing,

New roads would encourage an automobile-oriented lifestyle with significant increases in air and carbon pollution. The expansion would also pave over regionally significant fish and wildlife habitat.

Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Sunday, September 22, 2024 3:06 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#261]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Jeff Mapes
Email *	mapes.jeff@gmail.com
Address	2328 NW Glisan St. Unit 1 Portland, OR 97210
Your testimony	The City of Sherwood's proposal to convert more than 1,200 acres of rural land to urban development should be rejected by the council. The housing proposal does little to add to the serious lack of affordable housing in both the local area and in the region generally. Instead, the expansion plan adds to suburban sprawl and diverts from investment in more compact development.
Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, September 26, 2024 11:25 AM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#272]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Jennifer Chamberlain
Email *	tereza_fox@frontier.com
Address	16335 SW Hillsboro Hwy. 16335 SW Hillsboro Hwy. Scholls, OR 97123 United States

Your testimony

As a life-long resident of Washington County (born & raised in Scholls) I have a deep love for the surrounding areas around my home. When my parents moved here, Washington Square Mall did not exist and throughout my lifetime we've watched the march suburbia sprawl across what was once beautiful rural acreage. It's breaks my heart to see more beautiful fertile lands be paved over for consumer lifestyle...ESPECIALLY when there is ample land within the existing UGB that already has infrastructure in place. Show us how well you can manage your existing urban area. Clean Portland up, make her beautiful again before asking us to trust you with even more land. Build up, not out, in order to create affordable housing and to PROTECT and PRESERVE our farms, forests and natural areas.

DO NOT allow Sherwood West expansion to happen. It is irresponsible and short-sited.

Is your testimony related to an item on an	Yes

upcoming agenda? *

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, September 12, 2024 6:03 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#250]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Jordan Del Valle Tonoian
Email *	metro@jordandt.com
Address	245 SW LINCOLN ST, APT 4419 APT 4419 Portland, OREGON 97201 United States
Your testimony	REJECT UGB expansion proposal from City of Sherwood.
Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, September 18, 2024 9:29 AM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#257]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Kate Walker
Email *	kate@rylath.net
Address	1809 SE Hawthorne #104 Portland, OR 97214 United States

Your testimony

Hello, I'm writing about proposed changes to the Metro urban growth boundary. I am opposed to expanding the UGB in the Sherwood area. I've recently moved here from Austin Texas, which is filled with similarly built low-density housing built at the edge of the UGB. We should not be imitating the awful civic policies of Texas, as they result in ever-increasing levels of traffic congestion and car pollution. Austin, Houston, Dallas, San Antonio: all of these cities were dense and vibrant (exactly the way Portland Metro currently is) and now? Every Texas city is a hollowed-out shell filled with highways and surrounded by an ever expanding ring of low density suburbs. We should not be copying those oil-loving morons. Please do not expand the UGB.

Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Sunday, September 22, 2024 5:22 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#262]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Kathryn Evers
Email *	allismemoir@aol.com
Address	13587 nw logie trail Hillsboro, OR 97124 United States
Your testimony	I am against any expansion of the UGB North of Sunset Hwy between No Plains and Helvetia. I've lived here since 1976. Hillsboro needs to use the farmland it has already stolen both N and S of the highway.
Is your testimony related to an item on an upcoming agenda? *	Yes

Testimony
to the MPAC
September 25, 2024
in Opposition to West Sherwood UGB Expansion

Topic: Capacity of Vacant Land inside Sherwood Planning Area for Jobs

For the record my name is Kristie Spurling.

I live in Sherwood, near the proposed UGB expansion area.

I am a supporter of the West of Sherwood Farm Alliance.

The Alliance commissioned an analysis of what could be developed on the vacant land already inside the city of Sherwood plus the land inside the Brookman area and the Tonquin Employment Area that were previously added to the UGB.

We paid the Metro's Data Resource Center to identify vacant lands inside the Sherwood planning area, which include 275 acres of vacant commercial, mixed use, and industrial lands.

Using the *Sherwood West Concept Plan's own employee density numbers*, the vacant employment zoned lands inside Sherwood and the Tonquin Employment Area are sufficient for 5,527 jobs of the type they are projecting in the expansion area.

Using vacant lands would save taxpayers and ratepayers hundreds of millions of dollars in taxes and fees to pay for new infrastructure. Sherwood's projected funding shortfall of $58 to $70 million for new infrastructure would become irrelevant.

It would conserve the Class A and Class I wildlife habitat in and around Chicken Creek and highly productive farm and forestlands.

Please reject the COO's recommendation and direct your staff to prepare an alternative to meet any regional and local needs for additional jobs on vacant land inside Sherwood and the region's UGB,

Thank you for this opportunity to testify.

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Friday, September 13, 2024 12:32 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#254]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Liam Whitworth
Email *	liamrwhitworth@gmail.com
Address	1650 NW 21st Ave Apt 511 Portland, OR 97209 United States

Your testimony

I think Metro should focus on improving quality of life for all residents through using data on life expectancy by zip code, household costs and affordability, and age-friendly communities. I don't want to expand the urban growth boundary.

Metro can ensure that the region builds the housing its residents need, where they need it, and at reasonable price points by focusing development and redevelopment in existing vacant and underused lands, where there is already public investment in infrastructure.

Metro can support different kinds of transportation options that lower air and carbon pollution, make life less expensive for residents, and reduce congestion and driving times.

Our region's resources and low weather extremes offer a position of strength, but only if Metro stewards them well.

I'm confident that the quickest way to regional success involves building upon the area's existing footprint.

Thank you so much for considering this.

Is your testimony related to an item on an	Yes

upcoming agenda? *

Georgia Langer

From: Mallory Cochrane <mallory@birchsocial.com>
Sent: Wednesday, September 25, 2024 10:08 AM
To: Legislative Coordinator
Subject: [External sender]Public Comment - 9/26/24 Council Meeting

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

To the Metro Councilors,

I am writing in regards to the Public Hearing for 2024 Urban Growth Management: Chief Operating Officer Recommendations discussion at the upcoming Council Meeting on 9/26/24. I am a resident and small business owner in Sherwood and would like to see Metro approve the Sherwood West Concept Plan as proposed by the Sherwood City Council and widely supported by the Sherwood community. In this moment, you have the power to shape our community; I urge you to consider the future we are building for generations to come.

My business, Birch Social, is a local food consulting and marketing company in which my clients are small, local farms. My 10+ years of experience working in the food and agriculture industry, paired with my Master's degree in Food Systems and Society, makes me acutely aware of how land use and development affect our communities, environment and local food system. Too often land is used exclusively as a commodity, for short term financial gains, with prioritization of profit over sustainable land use and community needs.

There is vast potential for a new paradigm in land use to emerge and for Sherwood, it begins with the expansion of the UGB. It may seem counterintuitive for someone dedicated to local agriculture to support this expansion, but growth is imminent and there are ways to accommodate this that also protect farmland and even enhance the local food economy.

I empathize with the concerns of residents opposed to the growth of our city - I do not want to see sprawling housing developments without greenspaces or walkability, nor transportation networks that harm our environment and disrupt privately owned land. However, the Sherwood West Concept Plan serves as a framework for land use that includes considerations for these valid concerns. Without expansion of the UGB and adoption of this plan, future growth in our city will almost certainly be decided by developers and result in land access disparities, environmental degradation, and loss of community pride.

This moment offers an unprecedented opportunity to build and create a future for our city that is based in thoughtful, inclusive and sustainable land use. We can be an example for the rest of Oregon, and the nation, of what this new paradigm could look like and the many advantages it would bring to our community.

Growth in our city is inevitable and we need the UGB expansion to accommodate the increase in population and businesses. It is critical that smart growth practices be applied to the Sherwood West area so that we are future-proofing development in a way that enhances our community, increases economic prosperity and protects farmland, natural spaces and resources.

I appreciate your time and thoughtful consideration of this important matter.

Sincerely,
Mallory Cochrane

--
Birch Social
hello@birchsocial.com
@birchsocialoregon
Celebrating the power of local food from field to table

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, September 25, 2024 3:24 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#269]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Nancy Ponzi
Email *	nancy@lwdvineyards.com
Address	22230 Jaquith Rd. Newberg, OREG0N 97132 United States
Your testimony	This testimony is submitted in regard to the Metro Council UGB expansion proposal from the city of Sherwood. I'm in strong opposition to the proposal based on the concerns presented by 1,000 Friends of Oregon dated September 9, 2024. Richard Ponzi LAURELWOOD VINEYARDS
Is your testimony related to an item on an upcoming agenda? *	Yes

Georgia Langer

From: Niki Munson <NMunson@riversidehome.com>
Sent: Wednesday, September 25, 2024 12:13 PM
To: Legislative Coordinator
Cc: Preston Korst
Subject: [External sender]Urban Growth Management Decision/Sherwood UGB Testimony

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Dear Ms. Madrigal,

As a member of the Home Building Association of Greater Portland, I fully support and agree with the testimony provided to you by Preston Korst, Director of Public Policy and Government Affairs.

Riverside Homes has been doing business in the Portland Metro Region since 1989. We purchase, entitle, and develop land and then we build homes on the land we develop. I have been with Riverside since 2002. We have constructed around 2,000 homes in my time with the company. Never before have we struggled, as we are now, to find land to develop so that we can continue to build homes. It is my opinion, based on my experience, that the biggest factor affecting our regions affordability crisis is the lack of supply of land.

Please support Sherwood's request to expand the UGB so that companies like Riverside, regionally owned private companies, can continue to do business in this state.

Thank you for your consideration of my testimony.

Niki Munson
Land Acquisition and Development Manager
Riverside Homes
15350 SW Sequoia Parkway, Suite 320, Portland, OR 97224
503-645-0986 ext 104 (office) or 971-222-9965 (cell)

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To: Metro Council Lynn President Peterson
Metro Councilor Ashton Simpson, District 1
Metro Councilor Christine Lewis, District 2
Metro Councilor Gerritt Rosenthal, District 3
Metro Councilor Juan Carlos González, District 4
Metro Councilor Mary Nolan, District 5
Metro Councilor Duncan Hwang, District 6

CC: Marissa Madrigal, Chief Operating Officer, Metro
Catherine Ciarlo, Director of Planning, Development and Research

Date: 20 September 2024

We write in support of the August 23rd letter from 1000 Friends of Oregon regarding the Urban Growth Report and Sherwood Urban Growth Boundary Expansion.

We offer the specific focus of a lens based on three transportation crises in our region:

- Greenhouse Gases - Transportation represents 40% or more of the GHG generation in our region and despite Climate Smart and other RTP policies, continues to grow.

- Safety - Our transportation system continues to unacceptably kill and seriously injure residents of our region at an increasing rate. The deadly toll is recited at every JPACT meeting.

- Funding - The counties and cities of our region are developing an increasing backlog of deferred maintenance due to the effects of inflation, fuel economy and electrification.

In light of these urgent issues, development at the edge of the region, far from the

backbone of our transit system and with a heavy concentration on single-family construction, will make these issues worse and will drain resources from addressing these crises.

While we appreciate the inclusion of an affordable housing component in Sherwood's expansion plan, we believe households are better served by creating location-efficient affordable housing on existing main streets and transit corridors within the UGB.

We urge you to follow the recommendations of 1000 Friends and promote policies that drive development centered on existing transportation assets, especially main streets and station area communities.

Thank you.

No More Freeways PDX
Bike Loud PDX
Portland: Neighbors Welcome

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, September 25, 2024 6:23 PM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#270]

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Name *	Olivia Morgan
Email *	oamorgan90@gmail.com
Address	526 NE Graham St Portland, OR 97212 United States

Your testimony

I am writing this testimony from a Portland address because I cannot afford a home in Sherwood where I grew up. The proposed UGB expansion west of Sherwood plans for low-density, high-price housing. This expansion ignores other available urban reserves that are located along major transportation corridors and instead locates the expansion in irreplaceable farmland that lacks roads, public transit, and other necessary infrastructure. Recent nearby UGB expansions along Scholls Ferry still lack access to transit and sufficient water infrastructure for the expanded population.

The City's plan discusses developing denser, more affordable housing but discards it because right now there is more demand for the high priced housing included in the proposal. But bowing only to current demand is short-sighted and will prevent young people and families from moving to the area-now and in the future. In the long term this will mean an aging population and a lack of workers in the area.

Metro has acknowledged the need for denser development and better public transit to meet long-term planning goals. The City of Sherwood's current proposal would only make these goals harder to achieve.

Is your testimony related to an item on an upcoming agenda? *	Yes

PORTLAND METROPOLITAN ASSOCIATION OF REALTORS®

September 26, 2024

President Lynn Peterson
Councilor Ashton Simpson
Councilor Christine Lewis
Councilor Gerritt Rosenthal
Councilor Juan Carlos Gonzalez
Councilor Mary Nolan
Councilor Duncan Hwang

Metro
600 NE Grand Avenue
Portland, OR 97232

Dear President Peterson and Metro Councilors,

I am writing on behalf of the Portland Metropolitan Association of Realtors® (PMAR) regarding the COO and staff Urban Growth Management recommendations. We earlier weighed in on the Urban Growth Report, and appreciate the extensive work Metro's staff put into the report and the Urban Growth Report Stakeholder table; it was a welcome opportunity to better understand the report's underlying work, data, and assumptions, and to discuss some of our region's challenges and opportunities with other stakeholders.

PMAR recognizes the Portland region is lacking tens of thousands of homes necessary to meet our growing population and that people in our community suffer due to this lack of housing. Our region's current level of housing construction is 10.1% below the long-term average, and no where near on pace to catch up with past underproduction, let alone accommodate future growth. Portland in particular is struggling to keep up with needed housing production; the city is on track to produce only 500 new units this year, when the forecasted need by 2045 is more than 120,000 new homes.

As a region, we must do much more to meet our housing needs. Accordingly, PMAR strongly urges Metro to support the Sherwood West expansion proposal.

As a region, we must embrace land use, development, and zoning principles that provide and encourage an abundant mix of housing types that meets community needs and provides sufficient housing for current and future residents. Restrictive land use regulations play a major role in stymying the proliferation of new housing. **Growing the Metro area's capacity for housing**

development removes a significant barrier to housing construction. Getting the 2024 growth management decision right will support the continued growth and prosperity of our entire region: That starts with adopting the higher growth population forecasts in the Urban Growth Report, to set the stage for nearer term policy decisions and actions that will in turn foster stronger population growth, and help our region realize economic growth and prosperity.

PMAR also urges you to support the City of Sherwood's expansion proposal, particularly the 340 net acres of residential land proposed in the Sherwood West Concept Plan, which would support the creation of approximately 5,000 new homes.

PMAR believes that there is no one-size-fits-all to housing and that a vast array of homes of various types and at various price-points are needed to serve members of the community, accommodate new residents, and ensure that members of our community can buy a home that fits their unique needs. While Metro may want to make recommendations or provide incentives to encourage certain kinds of housing development, **PMAR would discourage prescriptive requirements or new regulations that would limit Sherwood's housing development options**.

PMAR is committed to working collaboratively with Metro and other stakeholders to ensure that our region's growth management decision is implemented in a way that benefits all residents and facilitates growth of the housing market. Thank you for the opportunity to weigh in on this important decision.

Michele Gila
Director of Realtor® Advocacy

REVITALIZE PORTLAND COALITION
A real estate collective creating a better city to live and work

REVITALIZE
PORTLAND
COALITION

1121 SW Salmon St. Suite 100
Portland, OR 97225
503-395-7792
info@revitalizeportland.com
www.revitalizeportland.com

September 24, 2024

Lynn Peterson, Chair
Members of the Metro Council
Metro
600 NE Grand Ave.
Portland, OR 97232

Dear Chair Peterson and Members of the Metro Council:

Thank you for the opportunity to address the Metro Council and the recommendations of the Chief Operating Office and Metro Staff. I chair the Economy and Housing Committee of the Revitalize Portland Coalition, which is a coalition of industry associations and firms in commercial and residential real estate. That is, we represent real estate developers, brokers, property managers, investors, architects, and construction firms. I'm also a professor emeritus in the Business School at Portland State University, having founded the PSU Center for Real Estate.

I will mostly comment on the housing market assumptions in the report. On the employment side, the lack of land is most acute for the industrial real estate community. Given the shift to online retailing, we have a strong need for industrial warehouses, which require flat land and proximity to Interstate 5. The current land shortage in Metro's UGB is steering industrial developers to Woodburn, Ridgefield, and other non-Metro communities.

Housing Market

RPC endorses the view of the Metro staff report on August 22, 2024, that "[T]he greater Portland region is facing a housing shortage crisis." (Metro, August 26, 2024, p.1) This housing crisis reflects both long-term chronic problems and recently implemented barriers to housing production. We are concerned that Metro staff isn't addressing this crisis very effectively.

The long-term problem is that this region is suffering from a "starvation land diet" that has been imposed by Metro decision-makers over the last 40+ years. Since 1970, the MSA regional population has grown by roughly 80%. By contrast, the urban growth boundary has been expanded by only 15%, with half that acreage coming in the ineffectual Damascus expansion in 2002.

The impact of the land constraint has been slowly developing, but inexorable. Population growth in the 1980's was sluggish, as subdivision developers were able to work with existing vacant land inside the

loosely set urban growth boundary. The boundary steered development in certain directions, but land buyers had options.

By the early 1990's, development activity and housing prices picked up, and landowners acquired more of a monopoly position on supply. Developers had to add additional infrastructure costs to development (eg, terracing) and adopt more expensive medium and high-density development models.

In response to rising home prices, developers learned to build 2-story housing and have smaller backyards. Properties along the existing urban growth boundary became the location for numerous master-planned communities, such as Forest Heights, Bethany, Villebois, and other communities. Multi-family developers found new opportunities, either along arterial streets, or within master-planned communities mentioned above.

Over time, however, these development opportunities have closed off. The 1979 UGB was initially a loose binding constraint, that steered development away from some places towards other places. By the 1990's, the scarcity of land put economic power in the hands of landowners, who were able to impose costs on the development community and, ultimately, homebuyers and tenants.

Moreover, many of the higher density development models end up costing more on a per square foot basis. Home buyers and renters typically experience cost savings in the move from 1-story to 2-story construction. However, 5-story construction, which is now common in close in Portland and close-in Beaverton, generally requires 50% higher rents. True high-rise construction beyond that 5-story limit generally requires an additional 50% boost in rents.

These additional housing costs are justified when the neighborhood offers a high level of amenities, attracting high-income households. However, when higher cost, high-density construction becomes the marginal housing units being supplied by the market, that pushes up housing prices and rents across the entire region.

These land-diet policies have slowed down economic and population growth, as the COO and staff document in their report. To some eyes, this slowdown in growth is exactly what the region wants. However, Oregon lies next to California, a large population state that is shedding population due to its own housing cost problems. Nearby states such as Washington, Oregon, Nevada, Arizona, and Colorado should be experiencing faster than normal population growth.

Unfortunately, our urban growth boundary has not been able to keep pace with the demand to live in the Portland metropolitan area, as shown in the table below. Housing production has consistently fallen from the 1990's to the 2000's to the 2010's. Not only do we suffer from the 25,000-housing unit deficit from the Great Recession (2008-2011), but we continue to underperform in terms of housing production in "normal" years. In the last decade, the 3-county region produced 16% fewer housing units per year than it did during the 1990's.

Annual Building Permits, 1990-present

	Multnomah	Washington	Clackamas	Clark	4-County Total	3-County Total
1990-1999	3,154	5,031	2,697	3,973	14,855	10,882
2000-2007	3,872	4,118	2,205	3,483	13,678	10,195

2008-2011	1,684	1,405	854	995	4,939	3,943
2012-2023	4,458	2,946	1,778	3,635	12,817	9,182
1990's-now	+41%	-41%	-34%	-9%	-14%	-16%

One of the surprising results of this tabulation is the growing importance of Multnomah County in the housing production of the region, whether seen as a 3-county region or a 4-county region. That increase comes entirely from multi-family construction, particularly 5-story construction in the City of Portland. Single-family construction in Multnomah County is down by 43% in the last decade vs. the 1990's. Multifamily construction in Multnomah County is up 127% over the same period. However, those increases in apartment units in Portland don't make up for the loss of single-family construction in the region. As noted earlier, the popular 5-story construction model is both smaller in square footage (accommodating few residents) and more expensive on a square foot basis, as discussed above. Moreover, as Appendix 3 notes, the number of people who work in their own home has increased from 11% to 21% of the workforce, increasing the demand for larger housing units.

In its July 9, 2024, Draft Urban Growth Report, Metro staff uses 5 pages to discount the potential for urban growth boundary expansions to provide significant amounts of housing, Using the example of the 1998 Happy Valley expansion, they found that 660 acres of land added to the UGB resulted in 6,200 homes being permitted (p. 11). In the 2002 Bethany expansion, staff found that 716 acres of UGB expansion has resulted in 573 homes built, with a total of 5,000 housing units planned. In both cases, they found the majority of housing units built were single-family units (58% and 68%), which is what you would expect for housing developed on the metropolitan fringe. They found similar racial and ethnic characteristics of residents in the expansion areas, and they found discounts of townhouse prices relative to single-family home prices, which is what you expect from having shared walls and smaller square footage.

The conclusion of Metro staff from these comparisons is that UGB expansions are a tough way to provide new housing and that three other regions (Austin, Denver, and Atlanta) had similar cost increases despite not having an urban growth boundary.

One result that Metro staff could have noticed is that development takes a huge amount of time. Happy Valley's build out of its 1998 expansion took as much as 36 years, and in Bethany, only 12% of the planned housing units have been developed after 24 years. These long time periods suggest that development is complicated, particularly when new development is expected to pay for costly upgrades to existing public services, and local and regional governments decline to pay for needed infrastructure improvements.

Cities are reluctant to sponsor expansions because whatever benefits the local community receives from new housing supply in terms of moderated prices and rents are shared among all the cities in the region. It's not as if Happy Valley or Bethany see reduced housing costs and nearby communities do not. The natural market for housing is metropolitan in scope, therefore we need regional subsidies for infrastructure to help make housing development actually happen.

Notice that, Metro staff have delivered a recommended housing and employment need that almost exactly matches the numbers that the City of Sherwood would provide, suggesting that the required conclusion directed the analysis. Instead, staff should recognize that the fact of only one jurisdiction pursuing an expansion suggests that more incentives are needed to get cities to plan for new expansions.

The decision by Metro staff to compare Portland's housing market to those of Austin, Denver, and Atlanta, equally misses the point of that data. These are much larger metropolitan areas than Portland and all three have faster population growth, and yet two out of three have lower housing prices

Portland Housing Market Comparison

	MSA Population	2010-19 Pop. Growth	2021 Median SF Price	2023 Median SF Price
Denver	3.01m	+16.7%	$607,100	$661,000
Portland	2.51m	+4.7%	$536,400	$584,000
Austin	2.47m	+29.8%	$488,600	$481,200
Atlanta	6.31m	+13.9%	$317.200	$374,000

In their report, Metro staff claim that "Austin, Denver, and Atlanta have similar housing prices to greater Portland, which could indicate that the UGB does not have significant impact on affordability in greater Portland." This is propaganda.

On closer examination, housing costs in two of these three regions are much lower (Austin and Atlanta). Austin is coping with very fast population growth without any increase in home prices. And Atlanta is a much larger metropolitan area in terms of population, which is normally an indicator of high prices, and yet has prices that are much lower. Home prices in Denver are higher than the Portland area, but that can be explained by its faster growth and higher population base.

A more appropriate metric for assessing the impact of Portland's UGB would be to look at land prices on either side of the urban growth boundary. In many places in the region, land inside the UGB sells for 20 times the value of land outside of the boundary. Metro staff pay homage to the intent of the land use planning system that protects agriculture and natural areas, but that sentiment leaves out the question of housing costs and whether the trade-off is a good one.

Projected Population Growth

In the July 9, 2024, Draft Urban Growth Report, Metro staff make projections about the amount of population growth that the region would experience in the next 20 years. Metro is required to include sufficient land inside the UGB to handle 20 years' worth of population and employment growth.

On pages 18-19 of the report, Metro displays the current population of the region, 2.51 million and three possible endpoints in 2044, 3.28 million, 2.90 million, and 2.52 million. Those outcomes are labeled the high, baseline, and low growth scenarios. While having three scenarios seems reasonable, those three growth rates analogous to the 2010-2019 growth rates in Sacramento, California; Louisville, Kentucky; and Buffalo, New York.

Portland Metro Population Growth vs. Other Metro Areas
9-year growth projection for Portland
2010-19 for other Metro areas

Portland Projected	High	+10.2%
Portland Projected	Median	+5.3%
Portland Projected	Low	-0.1%

Portland Actual	1990-2000	26.5%
Portland Actual	2000-2010	15.5%
Portland Actual	2010-2019	4.7%
Austin	2010-2019	+29.8%
Denver	2010-2019	+16.7%
Atlanta	2010-2019	+13.9%
Sacramento	2010-2019	+10.0%
Louisville	2010-2019	+5.2%
Buffalo	2010-2019	-0.7%

Notice that Metro staff have adopted population growth scenarios for the next 20 years that are far below the Portland area's growth rate in 1990-2000 and 2000-2010 and far below the three metropolitan areas that were identified to be good comparisons on page 15 in the report (Austin, Denver, and Atlanta). The baseline population projection by Metro staff is effectively that of a slow-growing, older rustbelt city, Louisville, Kentucky. Using such a moribund local economy as a model is a recipe for slow growth.

Moreover, the inclusion of a modest growth rate scenario like the +10.2%, which is like that of Sacramento, California in the last decade, is discounted later in the report. On page 34, Metro staff adopt the language of "high, baseline, and low," but the high and low numbers only refer to housing capacity inside the UGB, plus or minus 20%. Had staff chosen to treat a Sacramento-level of population growth as feasible, that would have required 327,000 new housing units. In Metro staff's "high scenario", the housing unit need falls to 244,200 (p. 34).

On balance, these projections suggest a risky path for Metro. A modestly high growth rate scenario, like Sacramento in the 2010-2019 decade, would be completed unsupported by our current urban growth boundary. In addition, Metro staff has washed away any problems with its modified high-growth scenario by assuming widespread adoption of middle housing and higher density multi-family housing.

Middle Housing Assumption

On page 40 of their report, Metro staff finds that 10% of the housing in 2013-2022 were middle housing and 57% was multi-family, for a total of 67%. Yet Census reports of building permits for the same period show only 60%. Staff should explain this inconsistency. Staff then make projections that middle housing will grow to 21% of the market with little evidence.

These projections are contradicted by data from Multnomah County, which has experienced the longest exposure to the "end of single-family zoning", as represented by the City of Portland's Residential Infill Project. To demonstrate this, we've constructed a table of the number of housing units permitted in Multnomah County that are either single-family, 2, 3, or 4-unit developments. Hence, this won't include large cottage clusters, but it shows all the duplex, tri-plex, and quad developments in the County. Granny flats are mixed in with all the other single-family units.

Multnomah County Middle Housing Production
Housing Units Built in 1–4-unit developments

	Single-Family	2-4 Units		Single-Family	2-4 Units
2010	1,420	45	2017	1,567	266

2011	1,688	63	2018	790	270
2012	1,718	55	2019	519	242
2013	1,582	101	2020	521	71
2014	1,567	106	2021	502	103
2015	1,659	157	2022	721	55
2016	1,756	198	2023	851	89

A reasonable interpretation of this data is that the City of Portland's Residential Infill Project (2020) has had minimal effects on the development of middle housing. Part of this may be the early adopters of granny flats and duplexes developed their units before the law passed and not many others have chosen the same path. Installing a duplex on your property requires a unique property and a unique type of owner. The supply of both is limited and might better be modeled as a depletable reserve.

Moreover, the optimism about expansion of middle housing to the rest of the region will face other limits. Cities have been busy developing codes for flexible housing development across their jurisdiction. Presumably, the demand for these units will be greatest in high-income suburban neighborhoods where lots are larger, and amenities are greatest. Yet many of those same neighborhoods are governed by private zoning rules that prevent building a second housing unit, subdividing a property, much less tearing down a structure to build apartments. Assuming this type of housing will comprise 21% of the market across the Metro area is wishful thinking. (see p. 40). No one at the state or local level is negotiating with neighborhood associations to loosen these rules.

Again, we are not arguing that this change in state and local zoning policy was a mistake. We need to have a flexible zoning policy that allows for neighborhoods to convert from exclusively single-family to a mix of housing types. However, we shouldn't assume that this transition is easy. Moreover, we should recognize that creating master planned communities like Villebois and River Terrace that integrate middle housing into neighborhoods that are otherwise single family is much easier to do with new greenfield communities. It's easier to resist NIMBY-ism before the single-family residents have arrived.

Other Barriers to Housing Development

Excessive housing development regulation is a national problem largely created at a local government level. In Oregon, we often make comparisons to traditional single-family zoning in California and elsewhere and pride ourselves on initiatives like the Metropolitan Housing Rule, the 2040 Growth Concept, the Residential Infill Project, and other initiatives to prove that we have avoided the California disease. Californians may hate density, but we favor dense development to protect our forests and farmland.

Yet as we demonstrate above, high density comes at a cost in terms of rents and prices at a per square foot level. The most expensive rooms in a housing unit – the kitchen and the bathroom – comprise a greater percentage of apartment square footage than it does in a single-family house. And high-density construction like the 5-story apartment requires an expensive concrete podium. True high-rise development requires expensive steel and concrete construction. Some of this can be mitigated with mass timber construction, but the costs remain higher.

Homeowners and renters can mitigate the high cost of housing by living in smaller units, raising their children in bunk beds, and using living rooms as bedrooms or home offices, but these are adaptations, not desired outcomes.

Our goal should be to build as many housing units as possible and ensure that these units are spacious, high amenity units. Put differently, Oregon receives about 45,000 migrants each year from California, many of whom come with considerable equity. We should strive to produce sufficient housing production to soak the demand of these in-migrants. The alternative is that they will move into existing housing and bid up prices in those neighborhoods.

As part of this policy, we need to remove regulations on rents in new apartment buildings. Since the legislature permitted inclusionary zoning in 2019, Portland and other cities have adopted this regulation. These policies require apartment developers to make a portion of their apartments (sometimes 5% or 10%) rent at below-market rates. In effect, the lost income will need to be paid by higher rents for market rate development.

This policy is problematic on several levels. First, most low-income households rent an apartment at market rates, with a small minority receiving a subsidized unit or a rent voucher. Second, new housing units tend to be more expensive than existing housing. To give one example, the Portland Housing Bond funded projects with an average cost of $446,000 per apartment. By comparison, a sample of sales of existing apartments in the city had an average price of $181,000. By focusing on new construction rather than vouchers, we raise the cost of rent assistance. Finally, by placing a development tax on new construction in the form of inclusionary zoning, we have reduced housing supply and raised rents for most low-income households who do not have a subsidy. Hence, this policy is inequitable, inefficient, and counter-productive.

We need greater oversight by Metro on the policies of local governments, particularly the City of Portland, that drive up housing costs. A recent Johnson Economics study found that the City of Portland required an average of 413 days to process permits, much slower than the City of Beaverton (275 days) and the City of Hillsboro (204 days). To reduce that number, the City needs to place its development review staff in the city's general fund, rather than using permit fees as a funding mechanism. Besides allowing fees to be lower, using general funds will ensure that there's a consistent workforce for development review, rather than a lot of firing during a downturn. To give another example, the City of Portland doubled the geographic scope of Design Review, which adds 3-6 months to a development timeline for minimal costs. And the City applies its Seismic Code to conversions of office buildings to apartments, even though many existing apartments of similar vintage are grandfathered.

In effect, we believe that Metro staff should become the overseers of municipal regulation of housing development in the region.

RPC's Recommended Land Use Policy

We believe that the goal of the Metro Council should be to reverse the trends towards ever-rising housing costs. We need Metro to become a "Yes in My Back Yard" advocate, rather than succumb to the NIMBY impulses of Metro staff and some of your constituents.

Towards that end, Metro should place its urban reserves inside the Urban Growth Boundary, provide funding for nearby jurisdictions to conduct the comprehensive planning, and remove Metro's veto on landowners and developments from planning new exurban residential development. The goal should be to release a large amount of land at once to create an urgency among property owners in the land market and to soak up the demand of migrants from California and high-income home buyers.

Below is a list of Metro's urban reserves and their acreage.

Metro's Urban Reserves

Cluster	No.	Name	Likely Jurisdiction	Acres
East Metro	1c	Gresham East	Gresham	857
	1d	Boring	Gresham…?	2,716
	1f	Boring-Highway 26.	Gresham…?	680
	2a	Damascus South	Happy Valley…?	1,223
Northwest	8c	Bethany West	Beaverton…?	72
	2	West Union	Hillsboro…?	440
	3	Bendemeer	Hillsboro…?	577
	4	Hillsboro South	Hillsboro	940
	7b	David Hill	Forest Grove	328
Oregon City	1	Holly Lane-Newell Creek	Oregon City	700
	2	Beaver Creek Bluffs	Oregon City	124
	3	Maplelane	Oregon City	573
	4	Henrici Road	Oregon City	360
	5	Holcomb	Oregon City	380
Sherwood	5b	Sherwood West	Sherwood	1,291
	5f	Tonquin Road	Sherwood	600
	5d	Brookman Road	Sherwood	447
	5a	Sherwood North	Sherwood	123
Stafford	4a, 4b	Borland	Tualatin	1,354
	4c	Stafford	Lake Oswego/West Linn	3,198
Wilsonville	4e	I-5 East	Wilsonville	848
	4f	Elligsen Road North	Wilsonville	633
	4g	Elligsen Road South	Wilsonville	256
	5g	Grahams Ferry	Wilsonville	63
TOTAL				18,783

These 18,783 acres would amount to a 7.2% increase in the Portland Metro Urban Growth Boundary. That level of expansion would represent something similar to the 17,756-acre expansion in 2002 in Damascus but would be more effective in that most reserves are proximate to an existing city. In some cases, critical infrastructure needs to be provided to make the land more accessible (eg, bridge, sewer connection). Having Metro develop funds to pay for those critical infrastructure investments would be helpful, as cities only experience a small amount of the benefit from lower housing prices. Since housing markets are regional, infrastructure support should be regional.

To understand the impact, Appendix 2 of the Draft Urban Growth Report gives estimates of the amount of housing that will be produced (or is planned) for areas recently added to the UGB.

Metro's New Communities

City	Name	Acres	Housing Production
Beaverton	Cooper Mountain	1,232	5,300

Tigard	River Terrace 2.0	500	4,541
Sherwood	Sherwood West	1,291	4,500
King City	Kingston Terrace	528	3,576
Wilsonville	Frog Pond	495	2,016
Hillsboro	Reed's Crossing	463	1,700
Hillsboro	Witch Hazel Village	150	1,068
Wilsonville	Clermont	27	89
TOTAL		4,686	22,790

In reviewing the list of urban reserves, some of them are less likely to develop than others. For example, several of the East Metro urban reserves are far removed from a neighboring jurisdiction and would require a major highway to become accessible. That would allow Metro to investigate whether there is a land swap for similar acreage in the Tualatin Valley, where there is good demand and flat terrain. That would allow Metro to substitute something better than the hard-to-develop parcels in Multnomah or Clackamas County.

Sincerely,



Dr. Gerard C.S. Mildner
Revitalize Portland Coalition

To: the Metro Council
From: Stu Peterson SIOR

I am a commercial real estate broker of 42 years experience, specializing in Industrial properties in the SW metro area. I have been involved in transactions with most of the large employers in that area. Never have I seen such a dearth of Industrial land available for growing businesses to expand into. As of this date there is literally only a single industrial site for sale that is ready to build of more than 5 acres. Further, in a normal year of industrial absorption of space, current inventories underway or permitted, would only be enough for 18 months' supply. Many of the SW regions manufacturers are expanding due to onshoring of many critical components of Semiconductor and other sensitive industries and land to accommodate these requirements is in critical short supply.

The Sherwood West industrial land included in the application for Metro's consideration as expansion, is of the utmost importance. Sherwood is a city that welcomes business and has long not had enough industrial zoned land to develop. The city has great demographics and is an ideal city for the regions employers to expand into. The future supply of Industrial zoned land is an overlooked factor in land use planning, that has long paid disproportionate attention to housing, and not enough to the employment land that supports all facets of a community and its development.

Best Regards

Stu Peterson SIOR

September 24, 2024

To: Metro Policy Advisory Committee Members
Re: UGB Expansion Recommendation to the Metro Council Testimony
Fr: Todd Christiansen

My name is Todd Christiansen
I appreciate the opportunity to provide important feedback and my point of view to the committee. My wife Shannon and I have been Sherwood residents for over 20 years. We also own property in the proposed expansion area near the high school.
We are opposed to the proposal and are asking the committee to reject the city of Sherwood's request to expand the UGB.

I understand that land use planning is an extremely complicated, multi-dimensional issue, and is always contentious. The committee is tasked with making important decision(s) that have far reaching, generational consequences. As you evaluate this request, my asks of the committee are very simple:

1. Follow the FACTS and DATA
    a. Metro's own economic forecast, including data on population growth and housing, need does not support the NEED for expansion of this scale
2. Follow the Metro Charter/Guidance
    a. I ask the Committee to evaluate the request, by following the prescribed legislation, purpose and protocol for UGB expansion based on **need**. The charter does NOT and should NOT be influenced by special interests.
3. Consider all perspectives and be truly objective
    - Many of us are concerned that this hearing is simply symbolic or a check in the box. It may be that some of you have already decided to approve.
    - Some indications of this include:
        - what was said, and not said, in your work session on the urban growth report and COO recommendation
        - Councilor Gonzalez announcing his support for the proposal on July 11, before the official public comment period even began, perhaps reflecting the fact he, and other members, have received major campaign contributions from people and businesses who have a financial stake in UGB expansion

However, it is an important reminder that the responsibility and duty for all members is to engage and consider **all** testimony. I ask that you listen carefully, and genuinely consider the discussion. You may even hear something that will stimulate you to assert your leadership role, ask questions, and consider whether there is truly demonstrated need for the UGB expansion at this time. If you do so, I am confident agree that the answer is No.

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Thank-You

To: Metro Council Lynn President Peterson
Metro Councilor Ashton Simpson, District 1
Metro Councilor Christine Lewis, District 2
Metro Councilor Gerritt Rosenthal, District 3
Metro Councilor Juan Carlos González, District 4
Metro Councilor Mary Nolan, District 5
Metro Councilor Duncan Hwang, District 6

CC: Marissa Madrigal, Chief Operating Officer, Metro
Catherine Ciarlo, Director of Planning, Development and Research

Date: 20 September 2024

We write in support of the August 23rd letter from 1000 Friends of Oregon regarding the Urban Growth Report and Sherwood Urban Growth Boundary Expansion.

We offer the specific focus of a lens based on three transportation crises in our region:

- Greenhouse Gases - Transportation represents 40% or more of the GHG generation in our region and despite Climate Smart and other RTP policies, continues to grow.

- Safety - Our transportation system continues to unacceptably kill and seriously injure residents of our region at an increasing rate. The deadly toll is recited at every JPACT meeting.

- Funding - The counties and cities of our region are developing an increasing backlog of deferred maintenance due to the effects of inflation, fuel economy and electrification.

In light of these urgent issues, development at the edge of the region, far from the

backbone of our transit system and with a heavy concentration on single-family construction, will make these issues worse and will drain resources from addressing these crises.

While we appreciate the inclusion of an affordable housing component in Sherwood's expansion plan, we believe households are better served by creating location-efficient affordable housing on existing main streets and transit corridors within the UGB.

We urge you to follow the recommendations of 1000 Friends and promote policies that drive development centered on existing transportation assets, especially main streets and station area communities.

Thank you.

No More Freeways PDX
Bike Loud PDX
Portland: Neighbors Welcome

WASHINGTON COUNTY
Coordinating Committee

Committee members:
(alphabetical by jurisdiction)

Stephanie Jones, Mayor
City of Banks

Lacey Beaty, Mayor
City of Beaverton

Jef Dalin, Mayor
City of Cornelius

Keith Jehnke, Mayor
City of Durham

Malynda Wenzl, Mayor
City of Forest Grove

Bill Martin, Mayor
City of Gaston

Steve Callaway, Mayor
City of Hillsboro

Shawna Thompson, Mayor
City of King City

Teri Lenahan, Mayor
City of North Plains
WCCC Vice-Chair

Tim Rosener, Mayor
City of Sherwood

Heidi Lueb, Mayor
City of Tigard

Frank Bubenik, Mayor
City of Tualatin
WCCC Chair

Nafisa Fai, Commissioner
Washington County

Julie Fitzgerald, Councilor
City of Wilsonville

September 3, 2024

Metro Council
600 NE Grand Ave.
Portland, OR 97232

Re: 2024 Growth Management Decision

Dear Chair Peterson and Metro Councilors,

Thank you for the opportunity to comment on the draft Urban Growth Report (UGR) and Sherwood West urban growth boundary (UGB) expansion proposal. The 2024 growth management decision is the blueprint for how Metro Council will lead the region in planning for future housing development and employment opportunities. This decision will have a particular impact on Washington County with Metro Council's consideration of the City of Sherwood's UGB expansion proposal.

The Washington County Coordinating Committee strongly supports the Metro Chief Operating Officer's recommendation to expand the Metro UGB to include the 1,291 acres within the Sherwood West urban reserve area.

The city has demonstrated their readiness to serve the area with governance and infrastructure as required by Metro's Urban Growth Management Functional Plan. The City's plan envisions that up to 5,582 housing units and 4,524 jobs could be accommodated in the expansion area. We all understand that providing housing is of paramount importance in our region and statewide.

Sherwood has demonstrated, through their local analysis and planning efforts, that the proposed Sherwood West employment area has the site suitability characteristics to attract more of the types of industry that Sherwood has successfully recruited to the city in recent years. The draft

155 N First Avenue, Suite 250, MS 16
Hillsboro, OR 97124-3072
phone: 503-846-4530
email: lutdir@co.washington.or.us

UGR shows there is employment land in the Metro region; however, it is largely made up of small to medium-sized parcels which are not especially conducive to attracting industrial development. Sherwood West can provide larger lot industrial land to help meet the needs of employers. In addition, Washington County's employment rate is higher than that of the region, and employers are currently developing within Sherwood and adjacent cities. Sherwood has demonstrated that they are a place where people want to both work and live.

Thank you for your consideration. We look forward to continued partnership with Metro to make Washington County a great place to live and work.

Sincerely,



Frank Bubenik
Chair, Washington County Coordinating Committee

Georgia Langer

From: Wufoo <no-reply@wufoo.com>
Sent: Monday, September 23, 2024 10:50 AM
To: Legislative Coordinator
Subject: [External sender]Submit testimony to Metro Council [#264]

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Name *	Wesley Ward
Email *	wesleytward@comcast.net
Address	4315 SE 16th Ave Portland, OR 97202 United States

Your testimony

RE: Sherwood UBG expansion

Based upon the uncertainty of economic and population trends as documented by Metro, I urge Metro Council not to approve the expansion of Sherwood's UBG to accommodate potential housing and industrial growth. More attention should be given first to making better use of existing industrial land in Portland and other cities. I would suggest postponing decisions on UBG expansion until economic and population trends become clearer or tlaking an incremental approach rather than approving the full expansion proposed by Sherwood. Regarding expansion for housing, I would also suggest an incremental approach that requires a mix of housing types to create optimum density rather than allowing the "market" to dictate the housing mix. It appears that there are many ways to increase housing capacity within the Metro area, but there are very few if any ways to replace lost farmland. Metro should encourage the Land Use and Development Commission to close loopholes in exclusive farmland and forestland zoning.

Is your testimony related to an item on an	Yes

upcoming agenda? *