



COALITION FOR A LIVABLE FUTURE

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October 15, 2009

Metro Council
600 NE Grand Avenue
Portland, OR 97232

Dear President Bragdon and Metro Council:

We offer the following comments regarding Metro's *Making the Greatest Place* on behalf of the Coalition for a Livable Future, a partnership of over 100 diverse organizations and hundreds of individuals to promote healthy and sustainable communities. For nearly 15 years CLF has worked to protect, restore and maintain healthy, equitable and sustainable communities, both human and natural, for the benefit of present and future residents of the greater Portland-Vancouver metro area. During this time we have consistently participated in Metro's long range planning processes. In the context of the *Making the Greatest Place* planning, we have served on the Reserves Steering Committee, TPAC, the RTP Workgroup, the HCT Think Tank, and TSMO Workgroup.

We support the three overarching recommendations outlined in Chief Operating Officer Michael Jordan's report released on September 15, 2009 and believe they reflect the values from Region 2040. We appreciate the hard work and thoughtful approach Metro staff brought to this effort.

While the recommendations in the COO report are laudable, we are concerned that the ability to achieve these goals is hampered by lack of accountability and local actions in contravention to the recommendations. We have seen a consistent pattern of discrepancy between Region 2040 aspirations and on-the-ground actions.

For example, Washington County is looking to create huge urban reserves, some of which include the floodplains of the Tualatin River and its tributaries. In addition, the list of projects proposed for the Regional Transportation Plan (RTP) includes many costly major road expansions that are not consistent with the RTP's goals or, for that matter, *Making the Greatest Place*.

Fundamentally, our approach to regional development has always prioritized protecting and restoring ecosystems inside and outside the urban growth boundary, preserving farmland, and building healthy, inclusive and equitable communities. If carried out using a comprehensive, accountable triple bottom line approach, we believe that our concerns can be addressed by responding to the following recommendations:

1) Make addressing climate change an overarching principle. The imperative of climate change is too big to limit our response to mitigation through reducing the production of greenhouse gases. The region's response to climate change must also include adaptation. Natural landscapes and the region's urban green infrastructure are essential to respond to predicted increases in winter storm events which

will result in increased stormwater inputs, to increased probability of urban/wildland fires, expansion of floodplains beyond current FEMA 100-year floodplain, and increased threat of landslides, especially in the urban landscape.

Climate change also will have major ramifications for regional (as well as global) water supply. Balance is needed, as some systems, such as Portland's, are underutilized while others are overutilized (e.g., Haag Lake Dam is being raised at great expense). Overutilization affects Total Maximum Daily Loads (TMDLs) and temperature, further exacerbating environmental issues. Fortunately, for now, there is no municipal water shortage; however, regional planning and coordination is needed in the region. Further, water providers need to begin working together (whether through requirement or incentive) and discontinue using sensitive water sources, such as the Clackamas River.

Metro's scenarios analysis completed last fall demonstrated that even under the most ambitious transit scenario, the projects that make up the Regional Transportation Plan (RTP) do not reduce global warming pollution below current levels. The actual project lists submitted for inclusion in the RTP are far behind this ambitious (but still, frankly, inadequate) transit-oriented scenario. Preliminary results from the performance evaluation show that both the federal and state priority lists are *worse* than doing nothing. This means that we will need to make up more lost ground in the next RTP update unless we make major revisions now to begin to meet the imperative of climate change.

2) Constrain urban reserves to a size that focuses regional development strategies on communities already in the UGB.

Once land has been urbanized it is impossible to reverse the impacts to farm, forest and natural resource lands. Metro's Urban Growth Report indicates that under *current zoning* we have enough land to fulfill our needs for the next 50 years if we utilize existing buildable land inside the current UGB more effectively. However, it is also imperative that streams, wetlands, and upland forests be protected and that ample parks, trails and natural areas be provided inside the Urban Growth Boundary. In the past, compact urban form has been promoted at the expense of natural resource protection. A quid pro quo of growing up and not out must be enhanced. For instance, cities and counties must remove height restrictions from their building code (thus demonstrating a commitment to efficient use of land within their existing UGBs) before being allowed to expand into urban reserve areas.

Washington County is proposing 34,000 acres of urban reserves. These are so large they will irreparably damage the future of agriculture in the western part of our metro region and Northwest Oregon, and consume floodplains and other natural landscapes.

Clackamas and Washington counties are in the top 5 agriculture-producing counties in the state. Multnomah County is among the top counties in food processing, which was the only manufacturing sector in Oregon to show positive employment gain in 2008.

Furthermore, the vehicle traffic these areas would generate once urbanized is completely contrary to the goal of an urban form that reduces greenhouse gas pollution.

3) Support vibrant centers to simultaneously get the most out of our limited dollars while advancing equity.

Urbanization of rural land is extraordinarily expensive. Metro and other studies show that the cost of providing sewers, water, roads, and sidewalks to accommodate a growing population on new land at the urban edge is up to *twice* as expensive as accommodating that same growth in the existing urban area, through infill, redevelopment, and making more efficient use of existing infrastructure.

Creating vibrant regional and town centers and compact neighborhoods in already developed areas has multiple benefits: it helps reduce global warming; protects farmland, parks, and natural resources; reduces wasteful spending on public infrastructure; and promotes health and equity.

Many cities are already working on developing vibrant centers by attracting more retail businesses, increasing housing, and obtaining better transit service. Projects exist throughout the region, including transit station areas in Forest Grove, the Beaverton Round, the Lents area, Tigard Triangle, and Milwaukie's downtown and future light rail stations. There are limited public and private dollars to help these areas succeed, and new areas added to the UGB will compete directly with these investments.

Focusing on centers will also advance equity if we simultaneously use tools and resources to ensure a mix of housing types and costs, including affordable units and accessible housing for people with disabilities and equitable distribution of parks, trails and natural areas. Metro's Housing Needs Analysis shows that affordable communities will be in regional and town centers. Affordability of these locations must be a top priority.

4) Invest heavily in bicycle, walking, and transit, and expanding the bi-state regional pedestrian and bicycle trail network, rather than road building. Connect these to investments in affordable housing, parks and natural areas and ensure they benefit communities with the greatest needs.

The project lists submitted for the RTP are full of road building projects, most of which will increase driving and greenhouse gases in the future, and lead to other negative health and community impacts that undermine regional goals. The principles promoted in the RTP appropriately call attention to the value of neighborhoods with a regular network of local roads that relieves local traffic from arterial streets and provides safe and convenient connections for bicyclists and pedestrians to public transit, schools and other local destinations. However, the proposed RTP projects seem to be directed at major road expenditures.

Prominent examples of how the proposed RTP project list falls short on many of the Making the Greatest Place goals:

- Washington County and cities are proposing over 100 road widening projects, some up to seven lanes, and over 80 new roads and road extensions.
- Over 80% of Clackamas County's budget is spent on road expansions, including over 60% for projects that widen roads to add vehicle lanes.
- 100% of Happy Valley's proposed budget is for new roads and road widening, with no funds allocated specifically to creating an integrated bicycle and pedestrian network, better functioning of the existing road system, or access to transit.

- The City of Portland and Port of Portland have proposed a new bridge to West Hayden Island, which will lead to additional global warming pollution and destroy one of the largest and most important unprotected natural areas in the region. The Portland City Council recently reaffirmed that the need for this bridge is contingent upon the outcome of the ongoing West Hayden Island Planning Process. We question why a bridge, the need for which is uncertain at this time, remains in the RTP, displacing other important projects.
- And as we have discussed extensively in other contexts, ODOT has already allocated tens of millions to plan the Columbia River Crossing, a multi-billion dollar boondoggle that will lead to many of the problems the region is working to avoid: sprawl development, increased driving, global warming pollution, and poor air quality. It will also create pressure to expand I-5 in other locations, and ODOT has already proposed both at the Rose Quarter and further south on I-5, exacerbating the negative impacts.

These expensive road projects also hinder our ability to make lower cost investments that would more effectively provide transportation choices and meet regional goals. Dozens of bike and pedestrian improvements or smaller transit access projects could be budgeted for funding in place of just one expansion.

Most road building projects should be removed from the RTP and replaced with large investments in bicycle, walking, and transit, and connect them to investments in affordable housing, parks and greenspaces. The only road projects that should remain in the RTP are ones that increase street connectivity, completeness, or efficiency, while integrating green streets measures to the greatest extent possible. These changes would support MGP outcomes for vibrant communities, safe and reliable transportation choices, leadership on climate change; and clean air and water.

In order to achieve this, Metro should create a system to encourage or require jurisdictions to remove outdated projects from lists, allowing more projects that meet regional goals to be included. Metro should build on the evaluation methods used in the MTIP to create a process in the RTP and other MGP decisions that are truly accountable to the outcomes. Furthermore, the RTP should put a premium on making connective transit more competitive with auto travel.

6) Invest in green solutions to water quality, flood reduction, and support healthy ecosystems and watersheds.

CLF member, Urban Greenspaces Institute, has submitted detailed comments regarding Climate Change and Ecosystem related issues. We support and stand behind these recommendations.

7) Make affordable housing an integral component of Making the Greatest Places

Some of the big-picture questions that arise around equity include how to avoid the future displacement of low-income and culturally diverse populations as land values continue to increase, and how to prevent the negative impacts when displacement occurs. These issues have arisen both for low-income populations in central city communities and for those living in manufactured homes.

The Coalition for a Livable Future's *Equity Atlas* substantiates that people have been priced out of Portland's urban core and settled into the outer areas of the region. Yet, transportation costs in these

areas are higher now and projected to rise in the future. Without adequate planning for affordable housing, linked to transportation, these communities could languish in increasing isolation, with growing housing and transportation cost burdens.

Metro must assert itself by demanding of jurisdictions combined planning for permanent affordable housing and equitable, affordable transportation choices, particularly in centers and corridors targeted for future development. Jurisdictions that integrate permanent affordability measures in their infill and redevelopment efforts and transportation projects that show linkage to affordable housing should be prioritized. Those projects that do not address affordability should be revised.

We do not support the claim that expanding the UGB is necessary to increase the stock of affordable housing. The Urban Growth Report documents that over 95% of the residential construction permits have gone to areas inside the original 1979 UGB. Furthermore, the Urban Growth Report found that the price of new homes in UGB growth areas has averaged \$100,000 more than inside the preexisting UGB.¹ Metro should require specific levels of affordability as part of the Intergovernmental Agreement establishing urban reserves.

7) Target technical assistance and other Metro resources to support infill, redevelopment and job creation efforts that are consistent with MGP outcomes in local jurisdictions where these efforts benefit low-income and other historically disadvantaged communities.

Metro should evaluate where concentrations of low-income and other historically disadvantaged populations are located in the region (where they exceed the region's average) and prioritize support for these jurisdictions. The Nature in the Neighborhood Grant Program is a great example of where Metro is already doing this and should be a model for how Metro allocates other resources where appropriate.

Supporting a strong and diverse workforce is a key aspect of ensuring equity in our regional planning efforts. Metro should expand its minority, women and emerging small business (MWESB) program as well as provide tools and technical assistance to local jurisdictions to support them in expanding workforce diversity. For example, Metro should require all contractors responding to Metro RFPs to explain how they will recruit and consider a diverse workforce for employment. In addition, Metro should establish measurable workforce targets for specific populations as a key element of protecting and creating good jobs for the people who live here now, and those who will come, and provide tools to help jurisdictions achieve the targets

8) Convene key players to develop new revenue and investment strategies

Stimulating investment to realize the Making the Greatest Place plan is a critical element of our success. We urge you to identify new opportunities for revenue sharing, possibly at a more localized scale than the entire region, and incubate the appropriate partnerships to pilot this important strategy for advancing equity while also realizing other MGP goals. Additionally, we urge you to explore new financing and investment mechanisms and strategies, including the possibility of an infrastructure initiative, to help finance full realization of MGP and the 2040 vision.

¹ Median sale price of new construction was \$262,000 in areas within the UGB in 1997, and \$367,500 in Post-1997 UGB Expansion Areas. Draft Urban Growth Report (released September 15, 2009), page 112.

9) Develop strong accountability mechanisms with consequences as well as rewards.

Metro has struggled to ensure that its local jurisdiction partners demonstrate how the projects and plans they propose help actualize Region 2040. Possible mechanisms include performance measurement tracked through an annual audit, or use of criteria to evaluate projects, like those used in the Nature in the Neighborhoods Capital Grants Program and the Metropolitan Transportation Improvement Program. Furthermore, Metro should facilitate an agreement between jurisdiction partners to encourage adaptive management.

Metro should also strengthen accountability and adaptability by establishing key committees that align with the six Making the Greatest Places goals and the soon-to-be-established performance based outcomes. Leaders that make up MPAC, JPACT, and their associated technical advisory committees cannot be charged with policing themselves.

For example, Metro should re-establish a natural resource committee that provides advice from natural resource professionals. Formerly, the Water Resources Advisory Committee and Greenspaces Policy Advisory Committee provided such advice to Metro Council and staff. Metro should bring federal, state and private representatives with expertise in natural resource issues together to form a formal advisory committee. Similarly, Metro should establish equity, climate change, and economic vitality committees.

Metro has historically maintained a strong focus on the “place-based” elements of a creating a “sustainable and prosperous” region—primarily through a geographic and jurisdictional lens. As we have discussed throughout this document, we strongly recommend that Metro bring that same level of focus, prioritization, and capacity to issues concerning historically disadvantaged populations regardless of their location within the region—meaning that low income individuals, people with disabilities, culturally specific communities, seniors, and other groups. are considered and have equal footing as the jurisdictions within which they live.

The Coalition for a Livable Future wishes to be a full partner with Metro, local jurisdictions, and metro area residents to ensure the upcoming decisions result in a healthy, prosperous region now and in the future. We urge you to take the next big step forward toward realizing 2040 and strengthening the region’s work together to achieve this vision.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is for Ron Carley, and the signature on the right is for Jill Fuglister. Both signatures are written in a cursive, flowing style.

Ron Carley and Jill Fuglister
Co-Directors, Coalition for a Livable Future

Cc: Reserves Steering Committee
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