Memorandum

To: Reserve Steering Committee

From: 1000 Friends of Oregon, Land Use Representative to Reserves Steering Committee

Date: October 14, 2009

Re: Recommendations on Rural and Urban Reserves

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

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

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

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

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

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

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

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

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

Looking to the Future

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

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

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

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

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

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

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

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

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

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

Urban Reserves

• Be Conservative in Time and Population

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

² Prof. Arthur C. Nelson

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

⁴ Prof. Arthur C. Nelson, *Planning for a New Era*, Journal of the American Planning Association, Fall

^{2006.} Approximately 75% of those in a variety of surveys prefer attached housing or detached, small lot. ⁵ As the COO's report notes, the region needs approximately \$10 billion over the next few decades simply to repair and rebuild existing infrastructure. (p. 5)

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

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

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

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

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

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

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

⁷ Impresa, Inc., *Portland's Green Dividend*, prepared for CEOs for Cities, 2007.

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

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

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

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

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

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

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

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

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

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

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

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

• Reuse and Invest in the Land & Infrastructure We Have

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

⁹ ECONorthwest July 2004, p. 2-4

¹⁰ Id. at p. 5-3, Table 5-1.

¹¹ Metro, Regional Infrastructure Report, July 2008

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

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

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

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

• Economic Development: Be Truly Green

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

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

¹² Id.

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

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

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

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

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

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

¹⁴ Metro COO, Strategies for a Sustainable and Prosperous Region, Sept. 2009, p. 7.

¹⁵ Joe Cortright: <u>http://www.portlandtribune.com/news/story.php?story_id=124587742324069000</u>

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

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

Rural Reserves

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

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

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

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

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

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

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

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

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

Specific Area Recommendations

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

UR-B Bethany

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

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

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

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

UR-C North Hillsboro

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

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

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

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

Undesignated Areas around North Plains and Banks

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

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

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

UR-3 North of Council Creek

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

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

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

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

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

UR-E & F Southwest and Southeast of Cornelius

We do not support the COO suggestion to designate urban reserves south of Cornelius. This area is in active and long-time farming, and it includes a large floodplain of the Tualatin River, which forms an important natural landscape feature. The floodplain is extensive and makes urbanization of it very problematic. Urbanizing a floodplain is contrary to the current efforts of state and local governments to mitigate the impacts of climate change by *not* developing in such areas. The area should be designated as rural reserve, because it meets the rural reserve factors for both farm land and as an important natural landscape feature.

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

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

UR-G South of Hillsboro

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

UR-H Cooper Mountain East

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

UR-5 & 6 Farmington Area and West Cooper Mountain

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

UR-7 West Sherwood

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

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

We support the COO's and Clackamas County's recommendation of an urban reserve around Borland Road. We also support the County's recommendation of rural reserves south of Schaeffer Road in the Pete's Mountain area. Much of the remainder of the Stafford Basin does not qualify for rural reserves.

UR-W Central Oregon City

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

UR-Z and UR 13 Boring Area

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

UR-14 Troutdale

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

South of Willamette River

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