



Oregon

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June 8, 2012



TO: Land Conservation and Development Commission
Metro
Parties of Record

FROM: Jim Rue, Acting Director

SUBJECT: **Agenda Item 3, June 14, 2012, LCDC Meeting – Metro UGB**

The department's supplemental staff report on the Metro urban growth boundary amendment submittal, as directed by the Land Conservation and Development Commission on May 11, 2012, is attached. The report addresses Metro's response to the department's remand recommendation. Metro's response is included as Exhibit A to the report.

If you have questions about this agenda item, please contact Jennifer Donnelly, DLCDC Regional Representative, at (503) 725-2183, or jennifer.donnelly@state.or.us.



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TO: Land Conservation and Development Commission
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FROM: Jim Rue, Acting Director
Rob Hallyburton, Community Services Division Manager

SUBJECT: **Agenda Item 3, June 14, 2012, LCDC Meeting**

**SUPPLEMENTAL STAFF REPORT
PORTLAND METRO URBAN GROWTH BOUNDARY AMENDMENT**

I. AGENDA ITEM SUMMARY

This is a continuation of the Land Conservation and Development Commission (hereafter, “the commission”) May 10-11, 2012, review of Metro’s submittal of an amendment to the Portland Metropolitan Area urban growth boundary (UGB) to accommodate the full range of urban land uses through 2030. The submittal before the commission includes (1) a determination of the population and employment the region is expected to support in 2030; (2) analysis, findings, and conclusions regarding how much population and employment growth the region can accommodate within the existing UGB (the “capacity ordinance”); (3) a determination of the amount of additional land needed to be added to the UGB; and (4) analysis, findings, and conclusions regarding the appropriate locations for a UGB expansion.

For additional explanation of the submittal, see Chapter III of the department’s April 19, 2012, report to the commission.

If you have questions about this agenda item, please contact Jennifer Donnelly, DLCD Regional Representative, at (503) 725-2183, or jennifer.donnelly@state.or.us.

II. BACKGROUND

At its hearing on May 10, 2012, the commission heard an oral report from Department of Land Conservation and Development (DLCD, or “the department”) staff, a presentation from Metro, and oral argument from objectors. In its written and oral reports, the department recommended that the commission remand the submittal with instructions to Metro as follows:

1. Reconcile forecasted housing and residential land needs to the population forecast. Upon resubmittal, either: (1) demonstrate that the findings and conclusions contained in the housing and residential land needs analyses are supported by substantial evidence and based on the population forecast of 625,183, or (2) include the required findings and conclusions and reconsider whether or how much land needs to be added to the UGB.
2. Complete an employment land inventory in compliance with OAR 660-015-0015, as required by OAR 660-024-0050(1). Upon resubmittal, either: (1) demonstrate, based on evidence in the record, that the inventory of employment land within the UGB was completed according to these administrative rules; or (2) include a detailed inventory that identifies the supply of sites suitable for the expected uses as required by administrative rule.
3. Complete the UGB location analysis in a manner consistent with Goal 14 location factors and OAR 660-024-0060. Upon resubmittal, either: (1) demonstrate through evidence in the record that the method used by Metro in selection of analysis areas complied with Goal 14 and administrative rules, or (2) include additional findings demonstrating that the decision on selection of areas considered for inclusion in the UGB complies with Goal 14 and OAR 660-024-0060.
4. Demonstrate that the final decision complies with the Goal 14 location factors. Upon resubmittal, either: (1) demonstrate based on evidence in the record that the comparative analysis of alternative UGB expansion areas complied with the Goal 14 locational analysis independently of local location factors from the Metro Code, or (2) complete a new alternatives analysis that applies the Goal 14 factors separately from local factors.

On May 11, the commission invited DLCD and Metro representatives back to address outstanding issues and answer commissioners’ questions. The commission then deliberated on the issues before it. At the conclusion of the meeting, the commission continued the meeting to June 14, 2012, with a request to Metro to submit further explanation regarding how the existing record demonstrates compliance with relevant goals and rules and instructions to DLCD to consider this additional clarification and decide whether to modify its recommendation.

Metro provided the requested materials to the department on May 29, 2012 (Exhibit A). This report is the department’s response.

III. DEPARTMENT ANALYSIS

The department has reviewed the materials submitted by Metro since the commission hearing and offers the following observations.

A. Housing and Residential Land Need

See pages of 1-7 of Exhibit A for Metro's response to department concerns regarding housing and residential land needs. The department's review did not conclude the UGB submittal adequately demonstrates that the 20-year housing need by type will be accommodated by the amendment, or that the amount of residential land included in the boundary was needed (see pages 15-27 of the April 19, 2012, staff report.)

The commission can find Metro's submittal adequately demonstrates that housing needs will be accommodated. To do this, the commission must find that the total number of housing units Metro has determined to be needed for 20 years is sufficient, based on the combination of final population forecast converted to units, converted to land need.

Metro's claim in its oral argument and written response that the submittal complies with Goal 10 and ORS 197.296 is based in part upon the cities and counties being ultimately responsible to provide for needed housing. That is, Metro doesn't zone land and regulate development; that is the responsibility of the cities and counties. The local jurisdictions within the boundary must comply with OAR chapter 660, division 7, "Metropolitan Housing." This rule requires jurisdictions to designate land, allow specific residential uses, and require densities in a manner that complies with Goal 10 and the housing statutes. The rule contains specific density and housing mix requirements.

Division 7 can act as a "safe harbor" because the local governments that eventually assume zoning authority for the urban area are subject to the requirements of the administrative rule. The 15 units-per-acre requirement exceeds the density requirements of the rule, but there are no specific housing type or mix provisions implemented through the adopted amendment. The rule can serve as a substitute for specific Metro action regarding mix. The rule states: "The new construction density and mix standards and the criteria for varying from them in this rule take into consideration and also satisfy the price range and rent level criteria for needed housing as set forth in ORS 197.303." OAR 660-007-0000. The commission needs to find that Metro's UGB action will provide an *opportunity* for the cities to comply with the Metropolitan Housing Rule; with the "actions and measures" included in the capacity ordinance and the land added to the UGB, the department concludes that the commission can reasonably make this finding.

The other question before the commission is whether the UGB submittal includes an appropriate amount of land to accommodate a 20-year supply of residential land. The department's initial review found the record lacking in this regard because Metro didn't provide needed housing data by type at the "point" population forecast—only at the low and high end of a range. If the commission finds that Metro has adequately provided an opportunity for cities and counties to accommodate needed housing based upon the total number of units needed (15,896 units) at a

minimum density of 15 units per acre and, then the 1,657 gross acres that Metro added (approximately 1,000 acres developable) is appropriate. OAR 660-024-0040(1) states in part: “The 20-year need determinations are estimates which, although based on the best available information and methodologies, should not be held to an unreasonably high level of precision.” The number of needed units divided by the required density results in an acreage need reasonably close to the number of developable acres Metro added to the UGB.

B. Employment Land Inventory

See pages 7-12 of Exhibit A for Metro’s response to department concerns regarding the employment land inventory. All requirements in Goal 9 and its implementing rule, OAR chapter 660, division 9, apply only to “cities and counties.” A rule in OAR chapter 660, division 24, “Urban Growth Boundaries,” makes the inventory requirements in the Goal 9 rule applicable to “a local government” (which includes Metro).

Metro completed an inventory of land within the current UGB that is zoned for employment uses. The department found that the inventory was not performed according to all the requirements of OAR 660-009-0015(3) (see subsection C.3 of Attachment B to the April 19, 2012, staff report). The employment land inventory in the record includes most of the components required by the administrative rule, and many that are not required. The department found one component missing.

Regarding the commission’s boundaries in review conducted in the manner of periodic review, ORS 197.633(3) states in relevant part:

- . . . The commission shall confine its review of evidence to the local record. *The commission’s standard of review:*
- (a) For evidentiary issues, is whether there is substantial evidence in the record as a whole to support the local government’s decision.
 - (b) For procedural issues, is whether the local government failed to follow the procedures applicable to the matter before the local government in a manner that prejudiced the substantial rights of a party to the proceeding.
 - (c) *For issues concerning compliance with applicable laws, is whether the local government’s decision on the whole complies with applicable statutes, statewide land use planning goals, administrative rules, the comprehensive plan, the regional framework plan, the functional plan and land use regulations. . . . For purposes of this paragraph, “complies” has the meaning given the term “compliance” in the phrase “compliance with the goals” in ORS 197.747. (emphasis added)*

ORS 197.747 provides:

For the purposes of . . . periodic review under ORS 197.628 to 197.651, “compliance with the goals” means the comprehensive plan and regulations, on the whole, conform with the purposes of the goals and any failure to meet individual goal requirements is technical or minor in nature.

In light of the fact that Metro completed a robust employment land inventory that included consideration of many of the site characteristics as required by the rule, the commission could find that the failure to address site characteristics “necessary for a particular industrial or other employment use to operate” as “minor in nature” and conclude the submittal “on the whole, conforms with the purposes of the goals” as Metro suggests in its response in Exhibit A.

C. Selection of Analysis Areas

See pages 12-16 of Exhibit A for Metro’s response to department concerns regarding how the areas selected for analysis under the Goal 14 location factors were determined. Metro did not apply the locational factors in moving from 28,256 acres of land designated urban reserves to studying only 8,300 and eventually 9,800 acres for further study. Instead, in 2010, “Metro used past studies, such as the Great Community Report, and findings from the urban and rural reserves process to eliminate some areas from further consideration.” However, under applicable law as expressed in OAR 660-024-0060(1)(b), all lands of the same hierarchy under ORS 197.298 are to be studied together and the evaluation of those lands is to be based on the locational factors of Goal 14. Thus, Metro should have applied the locational factors of Goal 14 to all of the urban reserves.

The methodology in division 24 does provide that a local government does not have to study all lands of the same priority under ORS 197.298 under certain circumstances. Under OAR 660-024-0060(1)(a), of the 28,256 acres of land designated urban reserve, Metro would be excused from considering those urban reserves it determined were not “suitable to accommodate the need deficiency under OAR 660-024-0050.” In that sense, the applicable law at least contemplates studying only a subset of the urban reserves for expansion of the UGB.

The commission is charged with determining whether, under the standard of review provided in ORS 197.633(3)(c), it may determine that the UGB submittal on the whole complies with applicable laws. The Court of Appeals has explained that in making that determination, the commission is required to interpret the law; to explain inconsistencies; and to have evidentiary support. Thus, the commission’s order must “demonstrate in its opinion the reasoning that leads the agency from the facts it has found to the conclusions that it draws from those facts.” Where, as here, it is clear that an applicable provision of law has not been followed, to approve a submittal, the commission must analyze whether, nonetheless, the submittal achieves the purpose of the law.

The commission could determine that the submittal achieved the purpose of Goal 14: “To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.” The commission would need to provide an explanation regarding the inconsistency between the methodology provided in division 24 and what Metro did.

D. Location Factors

See pages 16-19 of Exhibit A for Metro's response to department concerns regarding how Metro applied the Goal 14 location factors and Metro Code factors. A UGB amendment is subject to four location factors in Goal 14.¹ In addition to these, Metro simultaneously applied five factors from its own code to help guide the decisions regarding where to expand the boundary.² The department recommended remand of the amendment because it found that the record does not demonstrate that the decision properly applies Goal 14 requirements (see pages 30-31 of the April 19, 2012, staff report for a more complete explanation of the departments' recommendation).

Metro's response provides evidence and examples from the record to show that the decision is consistent with Goal 14. The response includes reasoning that is a plausible interpretation of Goal 14 requirements.

EXHIBIT

- A. Metro's response to LCDC/DLCD concerns, May 29, 2012
 - Attachment 1 (pp. 20-29 of digital file)
 - Attachment 2 (pp. 21-75 of digital file)

¹ (1) Efficient accommodation of identified land needs;
(2) Orderly and economic provision of public facilities and services;
(3) Comparative environmental, energy, economic and social consequences; and
(4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

² (1) Equitable and efficient distribution of housing and employment opportunities throughout the region;
(2) Contribution to the purposes of Centers;
(3) Protection of farmland that is most important for the continuation of commercial agriculture in the region;
(4) Avoidance of conflict with regionally significant fish and wildlife habitat; and
(5) Clear transition between urban and rural lands, using natural and built features to mark the transition.

Responses to LCDC/DLCD Concerns May 29, 2012

1. Meeting Housing Needs

Metro followed a stepwise approach to determine housing needs over the next 20 years and to provide capacity for those needs. Metro determined the region's need and capacity for housing both by overall numbers and by types and density of housing.

Need and Capacity: Overall Number of Dwelling Units

Metro began with population and employment forecasts: *20 and 50 Year Regional Population and Employment Range Forecasts*, September, 2009. The Metro Council adopted a resolution on December 10, 2009, that accepted the forecast as the basis for its analysis of UGB capacity. Cap Ord Rec 3861. The Council chose to develop a range, rather than a "point", forecast to account for the inherent uncertainty involved in long-range forecasting and to give it flexibility to select a point on the range after considering optional paths to accommodate needs. Metro's forecast was "vetted" by an independent panel of economic and demographic experts from across the U.S., as well as by local economists and demographers. Cap Ord Rec 98; 4034; 3861; 3867-3868. The forecast predicts population in the Portland Metropolitan Statistical Area (PMSA) (seven counties around the metropolitan area) will grow to approximately 2.9 to 3.2 million people by 2030, the end of the 20-year planning period. Cap Ord Rec 4633; 4035. The forecast predicts employment in the PMSA will grow to approximately 1.3 to 1.7 million jobs by 2030. Cap Ord Rec 4633; 8158.

Metro divided the population forecast by the estimated household size over the next 20 years and determined that the total number of households in the PMSA in 2030 will range from 1,181,300 to 1,301,800. Cap Ord Rec 3861; 8158. By subtracting existing households from this total, Metro determined that the PMSA would need to accommodate from 348,600 to 469,100 households. Cap Ord Rec 4304. Relying upon historical settlement patterns since 2000, Metro assumed 61.8 percent of these dwelling units will be built inside the regional UGB. Cap Ord Rec 4305. Metro applied a vacancy rate of four percent to account for relocating households. Cap Ord Rec 4304. This calculation led to a determination that the UGB would have to accommodate between 224,000 and 301,500 new dwelling units through 2030. Cap Ord Rec 4633; 4304-4308; 8160.

Metro then turned analyzed the capacity of the existing UGB to accommodate these housing units. Metro completed its *2009-2030 Employment and Residential Urban Growth Report*, January, 2010 ("UGR", accepted by the same 2009 resolution that accepted the forecasts). The UGR found ample maximum zoned capacity within the current UGB to accommodate the number of new dwelling units needed at the high end (301,500 units) of the forecast range. Cap Ord Rec 4124-4161; Appendix 6, Cap Ord Rec 4303-4303. Maximum residential zoned capacity is calculated from local zoning and comprehensive plan designations. Cap Ord Rec 4150-4154.

This zoned capacity is the result of two sets of actions taken by Metro and local governments in the region. First and foremost, cities and counties "upzoned" to implement Metro's 2040 Growth Concept. Consistent with the Growth Concept, most of the upzoning was made in the Central

City, the seven Regional Centers¹, the 30 Town Centers, the 60 Station Communities and the 400 miles of Corridors and Main Streets. Because these areas are commercial centers and are served by transit, the upzoning in these areas authorized multi-family dwellings and higher densities. Second, Metro added new capacity for housing by expanding the UGB in 2002.²

Metro's finding that maximum zoned capacity in the region was sufficient to accommodate housing needs at the high end of the forecast might have ended Metro's 2009 analysis. But Metro examined zoned capacity much more carefully, to determine whether it would be "real" capacity, for housing the market would actually build. Metro ran several scenarios through its econometric model,³ and learned that the housing market would not absorb the region's full zoned capacity under policies in place⁴ at the time of the analysis (2009). The scenarios showed the private sector would not build at the highest densities allowed by zoning in the center of Portland or in the suburban centers⁵ over the planning period. This is due in large part because the private housing market will not build high-density housing in areas of low land values and low rents. Cap Ord Rec 4156; 7911-7916. Instead, the market would send much of the housing outside the UGB to neighboring cities, principally the city of Vancouver. Cap Ord Rec 4134; 4162-4175; 6960-6995; 6996- 7046.

Given these market realities, Metro determined that the region had capacity for 196,600 new dwelling units if new no actions to "lead the market" were taken to use more of the zoned capacity. Cap Ord Rec 4157-4158. This determination left a need to accommodate between 27,400 and 79,300 new dwellings units. Cap Ord Rec 8160; 4304-4319; 8160-8162.

Metro found this result of full reliance on maximum zoned capacity, with no changes in policies, to be unacceptable. First, it would not meet Metro's responsibilities to provide opportunities for the types, mix and densities of housing shown to be needed in Metro's 2009 housing needs analysis. Changing demographics and housing market economics are leading to increasing preferences for multi-family dwellings and single-family dwellings on small lots and diminishing preferences for single-family dwellings on large lots. Cap Ord Rec 82; 3917; 4125; 6352; 6907; 7578; 7591. Instead, it would export some of those needs to Metro's neighbors. Second, sending housing units to surrounding cities would likely to result in sprawl and would generate commute trips back to jobs in the UGB. Third, it would diminish efforts by Metro and cities of the region to build compact, mixed-used, pedestrian-friendly and transit-supportive centers.

The prospect of these consequences led Metro and cities and counties to adopt new policies and actions, set forth in the Capacity Ordinance,⁶ to stimulate the market to use more of the UGB's maximum zoned capacity. When Metro tested the effects of these actions (using MetroScope), the results showed the private housing market would absorb another 30,300 housing units of existing zoned capacity.

¹ The Capacity Ordinance designated an eighth Regional Center – Tanasbourne/Amberglen.

² Ordinance No. 02-969B added capacity for 37,400 dwelling units.

³ Also used in its 2002 capacity analysis, acknowledged by LCDC.

⁴ No UGB expansion; only the investments in existing transportation and public services plans; etc..

⁵ "Centers" means the designated Central City, Regional Centers, Town Centers, Corridors, Main Streets and Station Communities.

⁶ Ordinance No. 10-1244B, now before the Commission.

The Metro Council decided, on recommendation by Metropolitan Policy Advisory Committee (MPAC), to aim its capacity and housing needs at the low end of the middle third of the range forecast. The “efficiency” actions taken by the Capacity Ordinance reduced the remaining need to 15,400 to 26,600 units at the middle third. Ultimately, the Council added 1,657 gross acres to the UGB for housing, finding that these several areas best met the need and the factors that guide the choice of land. Findings, UGB Ord Rec 4-8. These choices brought the forecast to a point near the lower end of the middle third of the range (625,183 new people by 2030) and added capacity for 15,896 housing units to the UGB.⁷

This means the zoning in place and actions taken by the Capacity Ordinance to use it more efficiently accommodated all but 15,896 of the 254,100 new units needed to house 625,183 new people through 2030. The actions taken by the Capacity and UGB Ordinances met Goal 14 and ORS 197.296(2) requirements to provide capacity for the number of housing units needed through 2030.

Need and Capacity: Housing Types and Densities of Dwelling Units

In Appendix 6 to the UGR, Metro determined the overall number of dwelling units needed to accommodate population growth at the high and low ends of the population forecast. Appendix 8 to the UGR parsed the overall need into the details, as required by statewide planning Goal 10 and the “needed housing” statutes (ORS 197.295-197.314).⁸ This second analysis shows the region’s historic performance building “needed housing” types, including the mix and densities of those units and their affordability. The analysis then forecasts the performance of the region in meeting needs over the next 20 years. Cap Ord Rec 4372-4398. The analysis assumes no change to the policies or levels of investment in place (in the Regional Transportation Plan, e.g.) at the time of the UGR. This means it is based upon the zoning in place in 2009.

The analysis shows performance at both the high (301,400) and the low (224,000) ends of the range of housing units needed. Figures 3.3a and 3.3b show vacant land demand for each housing type at both ends of the range. Cap Ord Rec 4378-4379. Figure 4.1B shows vacant and partially vacant land by zoning/housing type. Cap Ord Rec 4380. Figure 4.1D estimates the number of developed acres with infill and redevelopment opportunities based on zoning, land values, improvement values and lot sizes. Cap Ord Rec 4382. Figures 303.1a and 303.1b show projections for the numbers of housing units needed by type, tenure and affordability. Cap Ord Rec 4394- 4396.

Reconciliation of Need and Capacity for Housing Types and Densities

The housing needs analysis in Appendix 8 of the UGR forecasts housing needs by type at the high and low ends of the forecast range, and the maximum zoned vacant and infill/redevelopment capacity available to meet those needs. Metro reconciles the capacity (supply) to the need (demand) by feeding the critical inputs – maximum zoning, policies and public investments in place in 2009, etc. - through its MetroScope model. Because MetroScope is an econometric, equilibrium model, need and supply are not static; they respond to each other through price effects. Consequently, the modeling does not produce a gap between supply and demand so long as there is maximum zoned capacity for the numbers of types of units needed.

⁷ Approximately 1,000 net acres at more than 15 units/net developable acre.

⁸ “Needed Housing” Data Tables, Appendix 8 to the *2009-2030 Employment and Residential Urban Growth Report*

Cap Ord Rec 4394. Because the region has excess maximum zoned capacity even at the high end of the forecast for the numbers of types of housing units needed, as shown in Appendix 8, MetroScope shows that region can accommodate them. But Metro’s analysis did not end here, either.

Figure 303.2 shows housing will become more expensive by 2030 if there are no changes in policies and investments. Cap Ord Rec 4397-4398. MetroScope yields this result in part because the private housing market will not, under 2009 policies, produce the preferred number of multi-family housing units despite the zoned capacity that is available. The problems the region faces are not ones of zoned capacity. The problems are market capacity and affordability.⁹

The policy and investment actions taken by the Metro Council in the Capacity Ordinance are aimed at increasing market capacity and affordability. The Findings for the Capacity Ordinance explain how the actions taken will use more of the zoned capacity for multi-family dwellings and single-family housing on small lots:

“As noted in section IA1, communities within the UGB have sufficient zoned capacity to accommodate the dwelling units needed through the planning period. Analysis (MetroScope and experience) shows, however, that the market will not absorb all of the maximum zoned residential capacity because development is not market feasible, infrastructure is not available and is not expected to be available during the planning period, or both. Rec. 8160. But the same analysis also indicates that certain actions and combinations of actions can increase the feasibility and likelihood of residential development in places that would remain undeveloped or under-developed in 2030 without such actions. The Metro Council’s strategy is to take the actions described below to “lead” the market to use more of the zoned capacity of the region in order to use those lands more efficiently and to minimize expansion of the UGB. By this ordinance, the Metro Council adopted new policies in the Regional Framework Plan (RFP) to focus investments in those places in the region intended to accommodate higher residential densities: the Central City, seven Regional Centers, 30 Town Centers, light rail Station Communities, and hundreds of miles of designated Corridors and Main Streets. The Council also adopted a new approach to housing affordability: transportation investments in transit and other modes in order to make transportation more affordable. These investments will focus on parts of the region where households spend more than 50 percent of monthly income on housing and transportation.

This ordinance revised Title 1 (Housing Capacity) of the Urban Growth Management Functional Plan (UGMFP) to ensure “no net loss” of new residential

⁹ The market capacity problem is implicitly recognized in the “needed housing” statute, which requires a local government to demonstrate that measures it takes to use land more efficiently “demonstrably increase the likelihood that residential development will occur at densities sufficient to accommodate housing needs for the next 20 years....” ORS 197.296(6)(b). The statute goes on to say: “the local government shall at a minimum ensure that land zoned for needed housing is in locations appropriate for the housing types identified under subsection (3) of this section and is zoned at density ranges that are likely to be achieved by the housing market....” ORS 197.296(9).

capacity provided as the result of investments and other actions that generate the capacity. Rec. 8168; Ord Rec. 14-15 (Exhibit B).

The ordinance also revised Title 6 (Centers, Corridors, Station Communities and Main Streets) of the UGMFP to use investments and other incentives to induce cities and counties to revise their comprehensive plans and land use regulations to eliminate barriers to the types and densities of residential development and commercial and civic services that make higher-density residential development market-feasible. The community “assessment”, “plan of actions” and “investments” requirements of Title 6 were derived from the recommendations of a group of developers, development consultants, real estate economists, bankers and community development planners in a report prepared for Metro to facilitate development in centers and corridors. Rec. 3867.” Cap Ord Findings, pp. 3-4

Metro looked to the “actions or measures” listed in the “needed housing” statute (ORS 197.296(9)) and adopted actions it found reasonable: incentives (tax-increment financing, e.g.); increases in density (new Regional Center at Tanasbourne/AmberGlen, e.g.); minimum densities (Title 1 of the Urban Growth Management Functional Plan, e.g.); re-designation of non-residential to residential land (Beavercreek area of Oregon City, e.g.); a new infill/re-development strategy; and authorization of housing types not previously allowed (Tanasbourne/AmberGlen, e.g.). UGB Ord Rec Findings, pp. 4-8. The capacity gains from these actions was 30,300 dwelling units. Cap Ord Findings, pp. 4-10.

Areas Added to UGB

Metro added capacity (1,657 gross acres; approximately 1,000 net acres) to the UGB to accommodate a minimum of 15,896 dwelling units. The UGB Ordinance designated a “Town Center” in the South Hillsboro Area (SHA) and a “Main Street” in the South Cooper Mountain Area (SCMA) as the places where multi-family and small lot single-family dwellings will be concentrated. The remainder of these areas and the smaller Roy Rogers West area (RRW) were designated “Neighborhood.” The UGB Ordinance requires the cities that will urbanize the areas (Hillsboro, Beaverton and Tigard) to adopt zoning to provide capacity for at least 15,896 units [10,766 (SHA), 4,651 (SCMA) and 479 (RRW) units]. UGB Ord Rec Exhibit B, Conditions on Land Added to the UGB. The conditions will yield an overall density of more than 15 units/developable acre.

The UGB Ordinance does not specify the numbers of types of housing units or their precise locations by zoning district. This will happen when the three cities revise their comprehensive plans and land use regulations to allow urbanization of the land. These land use decisions by the cities will be subject to Goal 10 and the housing mix and density requirements of the Metropolitan Housing Rule. The planning will also have to satisfy the conditions in the UGB Ordinance described above. Finally, the planning will be subject to requirements in Metro’s Urban Growth Management Functional Plan for housing capacity¹⁰ and affordable housing.¹¹

¹⁰ Title 1 requires the cities to establish minimum zoned densities and to authorize accessory dwellings in zones that allow single-family dwellings.

¹¹ Title 7 requires the cities to include strategies and implementing actions to ensure a range of housing types in the areas.

Hillsboro and Beaverton submitted conceptual plans for the SHA and the SCMA. The materials submitted for the SHA include a community plan map, densities in sections of the area by housing type (Reeds Crossing; Butternut Creek, e.g.), an affordable housing profile, and resolutions adopted by the city planning commission and city council endorsing the plan. UGB Ord Rec 5, 8, 10, 12, 19-21, 1638, 1763-1766. The city of Hillsboro informed Metro that it would meet the conditions of the UGB Ordinance. UGB Ord Rec 1237-1238. The materials submitted for SCMA are less specific but, nonetheless, indicate expected housing types and densities in conceptual plans. UGB Ord Rec 370-400; 983-1026; 1033-1035. The city of Beaverton also informed Metro that it would meet the conditions of the UGB Ordinance for SCMA. UGB Ord Findings, p. 2.

Conclusion

Metro has determined the overall number of dwelling units needed to accommodate the new population forecasted for the UGB to the year 2030: 254,100 new units to accommodate 625,183. Metro determined that the region had more maximum zoned capacity than needed to accommodate these units. But Metro also determined that the private housing market would be unable to use all the zoned capacity and, hence, would be unable to accommodate all 254,100 new units under 2009 policies and levels of investment. Metro adopted “actions and measures” under ORS 197.296(9) to enhance the market capacity of the UGB, accommodating the great majority (238,204) of needed units within the pre-expansion UGB. Metro added approximately 1,000 acres of net developable land to the UGB to accommodate the remaining 15,896 units at more than 15 units/net developable acre. These actions provided the capacity for housing required by Goal 14 and ORS 197.296(2) and 197.296(6).

Metro further analyzed housing needs by type, density and affordability. Metro determined the numbers of types of units needed at the high and low ends of its forecast range. It determined that the pre-expansion UGB had sufficient zoned capacity for these numbers of units at the high end of the range: 301,500 units. This means the pre-expansion UGB also has sufficient zoned capacity for the numbers of units at any lower point along the forecast range, including for the 254,100 units needed to accommodate the forecasted 625,183 new people by 2030. This analysis fulfilled Metro’s responsibility under ORS 197.296(3).

This analysis provided the information required by ORS 197.296(3), but it did not complete Metro’s requirements under the “needed housing” statutes or under Goal 10. That is because Metro’s analysis showed the market would not produce the units, particularly the more affordable types of units, that zoned capacity allowed. The analysis also showed housing costs and rents would rise if no new “actions or measures” were taken under ORS 197.296(6)(b) and 197.296(9).

In response to this analysis, Metro adopted the “actions and measures”, directed to the region’s centers, described above and in detail in its findings. These actions will yield another 30,300 units from the More-than-sufficient maximum zoned capacity for housing in centers. Metro’s analysis of housing needs by type and density shows the particular multi-family and mixed use zones that provide this zoned capacity. This analysis and actions taken by the Capacity and UGB Ordinances fulfill Metro’s responsibilities under ORS 197.296(7) and 197.296(9).

Metro has complied with the housing requirements under Goal 14 and the “needed housing” requirements of Goal 10 and ORS 197.296.

2. Metro’s Inventory of Employment Land

OAR 660-024-0050(1) directs local governments, when evaluating or amending a UGB, to inventory land inside the UGB: “for employment land, the inventory must include suitable vacant and developed land designated for industrial or other employment use, and must be conducted in accordance with OAR 660-009-0015.”

OAR 660-009-0015(3) calls for the following:

- (3) *Inventory of Industrial and Other Employment Lands. Comprehensive plans for all areas within urban growth boundaries must include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use.*
 - (a) *For sites inventoried under this section, plans must provide the following information:*
 - (A) *The description, including site characteristics, of vacant or developed sites within each plan or zoning district;*
 - (B) *A description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory; and*
 - (C) *For cities and counties within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land.*

Metro completed an inventory of employment lands in the UGB. The question is whether the inventory complies with OAR 660-009-0015(3). Metro draws the Commission’s attention to its inventory, described in detail in its “2009-2030 Urban Growth Report, Employment and Residential”, dated January, 2010, and found in Metro’s Capacity Ordinance record at pages 4040 to 4119. A significant portion of the inventory and analysis is contained in Appendix 11 to the Urban Growth Report entitled “Employment Demand Factors & Trends”, E. D. Hovee & Co., LLC, March, 2009. (Metro submitted the following side-by-side comparison between the requirements of the rule and the information on which the inventory in the Urban Growth Report is based at LCDC’s May 11 meeting.) Metro made its draft inventory available to local governments, many of which reviewed and corrected information in the inventory. Cap Ord Rec 4101-4102.

OR Administrative Rules Division 9 – Economic Development	Metro Employment Land Inventory
Inventory of vacant and developed lands within the planning area designated for industrial or other employment use.	Metro analyzed over 70,000 acres of employment land inside the UGB to determine which portions were vacant, partially vacant, or developed. <i>Metro Exceptions, Appendix D</i>
Inventory site characteristics of vacant or developed sites within each plan or zoning district.	Metro has reviewed each of the 28 zoning codes in the region and developed regional zoning

EXHIBIT A

<p>OR Administrative Rules Division 9 – Economic Development</p>	<p>Metro Employment Land Inventory</p>
	<p>classifications to allow for consistent analysis. Metro also maintains a GIS database (RLIS) of all tax lots in the three-county area. The database describes the zoning classification for each tax lot. Zoning, particularly for lands that are developed, is taken as a proxy for suitability for commercial, industrial, or mixed uses. <i>Cap Ord Rec 4101-4102</i></p>
<p>Description of minimum acreage or site configuration characteristics.</p>	<p>This characteristic is more appropriately understood as a demand characteristic (e.g., what is the minimum size site demanded by a retail use with 20 employees). That said, Metro’s GIS database (RLIS) includes acreages for all vacant or developed tax lots in the planning area. Site sizes figure into Metro’s assessment of development readiness of vacant lands. Site sizes are also taken into account in the large-lot inventory and need analysis. <i>Cap Ord Rec 4101-4102</i></p>
<p>Description of site shape</p>	<p>Metro’s GIS database (RLIS) includes all tax lots in the planning area. The GIS inventory depicts site shapes for all tax lots. Additionally, Metro’s GIS database depicts the shape of buildable areas. As would be expected, there is tremendous variation in site shapes across over 70,000 acres. <i>Cap Ord Rec 4101-4102</i></p>
<p>Description of topography</p>	<p>In addition to relying on local zoning, Metro’s assessment of environmental constraints relied on GIS analysis that identified the following constraints:</p> <ul style="list-style-type: none"> • Water quality and floodplain protection (Title 3) overlays • Slopes over 10 percent for tax lots zoned for industrial uses • Slopes over 25 percent for tax lots zoned for non-industrial employment or mixed uses <i>Cap Ord Rec 4102</i>
<p>Description of visibility</p>	<p>It is unclear how visibility could reasonably be assessed for over 70,000 acres of employment land. That said, Metro’s GIS database (RLIS) includes tax lots and public facilities such as streets, from which a site could be visible. Visibility is primarily important for office, retail, and service sectors, many of which prefer locations in centers, corridors, main streets and station communities. Metro’s GIS database depicts the locations of these design types. Metro’s buildable land inventory</p>

<p>OR Administrative Rules Division 9 – Economic Development</p>	<p>Metro Employment Land Inventory</p>
	<p>documents which design type applies to each vacant tax lot. <i>Cap Ord Rec 4619-4626</i></p>
<p>Description of specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.</p>	<p>Metro’s GIS database (RLIS) includes the locations of public facilities including streets, arterials, major arterials, highways, sidewalks, bike routes, Port terminals, freight routes, airports, major freight rail lines, branch freight rail lines, rail yards, schools, school districts, city halls, fire stations, fire districts, police stations, libraries, light rail lines, light rail stations, bus stops, frequent bus stops, street car lines, street car stops, the aerial tram, transit districts, water district boundaries, sewer district boundaries, parks and greenspaces, park district boundaries, trails.</p> <p>Actual water, sewer, and utility lines are not depicted for security reasons. However, industrial zoning may reasonably be taken as a proxy for the existence or possible future availability of specialized infrastructure, utilities or services.</p> <p>The entire inventory of vacant employment land was analyzed, by tax lot, for development readiness. These development-readiness determinations were review by city and county staff. Factors related to public facilities include:</p> <ul style="list-style-type: none"> • Presence of urban services, infrastructure • Transportation access • Transportation congestion • Aviation flight protection overlay zones • Marine use restrictions <p><i>Cap Ord Rec 4101-4103</i></p>

<p>OR Administrative Rules Division 9 – Economic Development</p>	<p>Metro Employment Land Inventory</p>
<p>Description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory</p>	<p>In addition to relying on local zoning, Metro’s assessment of environmental constraints relied on GIS analysis that identified the following constraints:</p> <p>Water quality and floodplain protection (Title 3) overlays</p> <p>Slopes over 10 percent for tax lots zoned for industrial uses</p> <p>Slopes over 25 percent for tax lots zoned for non-industrial employment or mixed uses</p> <p>Streets and sidewalks reduce the amount of buildable land available on any specific tax lot. Metro’s employment analysis used the same methodology described for the residential capacity analysis, setting aside percentages of land for future streets (tax lots under 3/8 acre - zero percent; tax lots between 3/8 acre and one acre - 10 percent; tax lots greater than one acre – 18.5 percent)</p> <p>This GIS inventory of constraints was reviewed and verified by city and county staff.</p> <p>The entire inventory of vacant employment land was analyzed, by tax lot, for development readiness. These development-readiness determinations were review by city and county staff (see UGR for a description). Factors included:</p> <ul style="list-style-type: none"> • Environmental constraints • Buildable acreage • Presence of urban services, infrastructure • Zoning • Transportation access • Transportation congestion • Existing building and land value • Owner constraints • Brownfield status • Aviation flight protection overlay zones • Marine use restrictions <p><i>Cap Ord Rec 4101-4105</i></p>

OR Administrative Rules Division 9 – Economic Development	Metro Employment Land Inventory
<p>For <u>cities and counties</u> within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land.</p>	<p>Using the development-readiness tiers described above, the vacant land inventory was broken into short and long-term supply of land for nine market subareas and for industrial and non-industrial uses <i>see Cap Ord Rec 4104</i></p> <p>For developed land, refill rates were used to describe the share of future employment that is expected to occur in the short-term and the long-term through redevelopment and infill. These rates are reported for six building types and for industrial and non-industrial uses for nine market subareas (see page 77 of the UGR).</p> <p><i>Cap Ord Rec 4104-4108</i></p>

In addition, Metro analyzed the relationship between building intensities and capacity and the likelihood of re-development of developed and partially-developed employment sites. This informed Metro’s estimate of the rate of re-development and responsiveness to investments to increase employment intensity of developed lots. Cap Ord Rec 4106-4110.

The context for Metro’s analysis is important in determining compliance of the inventory with state law. First, Goal 9 itself does not apply to Metro. Goal 9 calls upon cities and counties to complete an “Economic Opportunities Analysis” (EOA) to support economic development strategies. This is not a Metro function.¹² Metro’s responsibility is a Goal 14 responsibility: to ensure the UGB has capacity for the jobs it forecasts the year 2030. Metro’s inventory and analysis of employment capacity fulfills its Goal 14 responsibility.

Metro made efforts to coordinate its analysis with city and county EOAs and economic development priorities. For example, Metro completed an economic cluster forecast to depict expected growth of clusters that are common priorities in the region.¹³ Cap Ord Rec 4066-4070. Responding to local government priorities, Metro developed a separate analysis of need for large industrial sites. Cap Ord Rec 4089-4093; 4113-4114; 4117-4119; 4257-4269; 4293-4302.

Second, cities and counties within the UGB are subject to Goal 9 and must themselves develop an “Inventory of Industrial and Other Employment Lands” as part of their EOAs.¹⁴ Whatever detail has been omitted from Metro’s inventory is provided by the cities and counties of the region in their inventories. Nonetheless, Metro consulted with cities and counties and made corrections to be consistent with city and county employment site information. Cap Ord Rec 4101-4102.

¹² There is no adopted regional economic development strategy.

¹³ Active wear; advanced manufacturing; bioscience; clean tech; and software.

¹⁴ Metro cannot, responsibly, simply assemble city and county EOAs into a coherent inventory of employment lands. EOAs are often influenced by economic development objectives and aspirations. Not all local governments have completed EOAs. Those that have use a variety of employment forecasts as their starting points. These limitations are discussed more fully in Appendix 1 to the UGR. Cap Ord Rec 4197-4199.

Third, while it is feasible and practical for cities and counties to provide information on the shapes and visibility of each employment site in their inventories, given the hundreds or several thousand acres of employment lands in their jurisdictions, it is not practical for Metro to provide that level of detail for the approximately 70,000 acres of employment land in the 25 cities and three counties (portions within UGB).

Omission from Metro's inventory of very detailed characteristics of individual tax lots, such as shape and visibility, do not reduce its sufficiency to determine the region's capacity for employment capacity. The commission views omission of these details as minor in the context of the inventory Metro completed and the context described above. The Commission is also mindful of a provision in the Goal 9 rule that applies to the inventory requirements in OAR 660-009-0015(3):

“The effort necessary to comply with OAR 660-009-0015 through 660-009-0030 will vary depending on the size of the jurisdiction, the detail of previous economic development planning efforts, and the extent of new information on national, state, regional, county, and local economic trends. A jurisdiction's planning effort is adequate if it uses the best available or readily collectable information to respond to the requirements of this division.”

OAR 660-009-0010(5). The great size and complexity of the Metro region, composed of the 25 cities and the urbanized portions of three counties, and the detail of inventory information provided by the cities and counties in the inventories, leads to the conclusion that Metro's inventory, with details almost to the level specified in the Goal 9 rule, is adequate. Where the inventory does not achieve the level of detail specified in OAR 660-009-0015(3), the omission of the detail is minor and insignificant in Metro's analysis of employment capacity. In sum, Metro's inventory of employment sites and the analysis based upon it comply with Goal 14 and Goal 9 rule.

3. Analysis of Urban Reserves Under the Location Factors of Goal 14

Metro explained in its Findings and the staff report for the UGB Ordinance how it sorted among the 28,256 acres of urban serves in order to select the most appropriate land to accommodate the need for housing capacity and for industrial uses that need large-parcels:

“Metro began the search for the most appropriate land to add to the UGB for this capacity with review of the highest priority lands outside the UGB, prescribed by ORS 197.298(1): the 28,256 acres of land designated urban reserves pursuant to ORS 195.141. Metro neither studied nor included lower priority land. To evaluate urban reserves for possible inclusion, the Council used the location factors in Goal 14 and the relevant policies of Metro's Regional Framework Plan (RFP) as guides. The location factors and policies are implemented in Metro Code 3.07.1425C.

“The Council concludes that drawing UGB expansion from urban reserves complies with ORS 197.298(1), Policy 1.9.3 of the Regional Framework Plan and Metro Code 3.07.1425C(7).

“In its first level of analysis, Metro considered all 28,256 acres of urban reserves. In 2010, Metro used past studies, such as the Great Communities Report, and findings from the urban and rural reserves process to eliminate some areas from further consideration. Metro also consulted with cities and counties to determine their interest in providing capacity for the needs identified, to provide governance and to provide infrastructure for areas that might be added. Following these consultations and consideration of Metro policies, Metro chose for further study approximately 8,300 acres close to the UGB and most suitable for the needs identified in the UGB. In 2011, Metro again invited local governments to propose other urban reserves to be more closely evaluated. Ultimately, Metro studied 9,800 acres. The process Metro followed is set forth at UGB Ord Rec 474-478.” Findings, p. 10.

Among the sources on which Metro relied in its analysis of urban reserves, as noted above, are the findings from the ordinances adopted by the Metro Council to designate urban reserves.¹⁵ During the three-year process leading to designation of urban and rural reserves by Metro and Multnomah, Clackamas and Washington Counties, Metro and the counties considered some 400,000 acres for possible designation. The analysis was guided by two specific sets of factors from the rules adopted by LCDC to implement the reserves statute.¹⁶

Metro and the counties divided the 400,000 acres into discrete areas for purposes of application of the factors to each. As required by the rules, the local governments applied all the factors to all the areas. Reserves Ordinance No. 11-1255, Findings. At the end of the process, the Council selected 28,256 acres from the 400,000 acres studied to designate urban reserves. The Council found that these lands were the best suited for urbanization among the acres studied. LCDC has given oral approval to these urban reserves.

The reserve factors relate quite closely to the location factors of Goal 14. The location factors and their closest counterparts in the reserves factors are set forth below:

Goal 14 Location Factor 1: “Efficient accommodation of identified land needs”

Reserve Factor: “Can be developed at urban densities in a way that makes efficient use of existing and future public infrastructure investments

Reserve Factor: “Includes sufficient development capacity to support a healthy urban economy”

Reserve Factor: “Can be designed to be walkable and served by a well-connected system of streets by appropriate service providers”

Reserve Factor: “Includes sufficient land suitable for a range of housing types”

¹⁵ Ordinance No. 10-1238A and, following oral remand by LCDC, Ordinance No. 11-1255 (revised reserves in Washington County).

¹⁶ Senate Bill 1011, codified at ORS 195.137 to 195.145, directed LCDC to adopt rules to implement the statute. The rules may be found at OAR 660 Division 27: urban reserve factors at 660-027-0050; rural reserve factors at 660-027-0060.

Goal 14 Location Factor 2: “Orderly and economic provision of public facilities and services”

Reserve Factor: “Can be developed at urban densities in a way that makes efficient use of existing and future public infrastructure investments”

Reserve Factor: “Can be served by public schools and other urban-level public facilities and services efficiently and cost-effectively by appropriate and financially capable service providers”

Reserve Factor: “Can be designed to be walkable and served by a well-connected system of streets by appropriate service providers”

Reserve Factor: “Provide easy access to recreational opportunities in rural areas, such as rural trails and parks”

Goal 14 Location Factor 3: “Comparative environmental, energy, economic and social consequences”

Reserve Factor: “Can be designed to preserve and enhance natural ecological systems”

Reserve Factor: “Are subject to natural disasters or hazards, such as floodplains, steep slopes and areas subject to landslides”

Reserve Factor: “Are important fish, plant or wildlife habitat”

Reserve Factor: “Provide a sense of place for the region, such as buttes, bluffs, islands and extensive wetlands”

Reserve Factor: “Are necessary to protect water quality or water quantity, such as streams, wetlands and riparian areas”

Reserve Factor: “Provide a sense of place for the region, such as buttes, bluffs, islands and extensive wetlands”

Reserve Factor: “Provide for separation between cities”

Reserve Factor: “Provide easy access to recreational opportunities in rural areas, such as rural trails and parks”

Goal 14 Location Factor 4: “Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB”

Reserve Factor: “Are situated in an area that is otherwise potentially subject to urbanization during the applicable period”

Reserve Factor: “The adjacent land use pattern, including its location in relation to adjacent non-farm uses or non-forest uses, and the existence of buffers between agricultural or forest operations and non-farm or non-forest uses”

Reserve Factor: “The sufficiency of agricultural or forestry infrastructure in the area”

Reserve Factor: “Can serve as a boundary or buffer, such as rivers, cliffs and floodplains, to reduce conflicts between urban uses and rural uses, or conflicts between urban uses and natural resource uses.”

Metro's Reserves Ordinance No. 11-1255, adopted several months prior to adoption of UGB Ordinance No. 11-1264B, sets forth the findings and analysis of the areas that comprise the urban reserves, using the reserves factors set forth above. Reserves Ord Findings, pp. 1-178¹⁷, Rec 613-796. The "Overall Findings" from that document (pp 1-10) (Attachment 1 here), provide a general description of the process Metro and the three counties used to apply the factors to areas studied and the results of the analysis for areas designated urban reserves. Also attached here are references to materials in the Reserves Ordinance, Capacity Ordinance and UGB Ordinance Records that provide evidence to support the findings for each area designated urban reserve (Attachment 2).

The LCDC rules implementing Goal 14 and guiding the selection of land for addition to the UGB provide the following:

"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298." OAR 660-024-0060(5)

When Metro designated urban reserves, it considered characteristics that make land suitable for "great communities" (compact, mixed-use, pedestrian-friendly, transit supportive development pattern) and for industrial users paramount. Ideal characteristics for these land needs are sites that are flat, with large parcels and few environmental constraints. Metro also emphasized proximity to the UGB for efficient and affordable extension of public services and transportation facilities. Even though the designated urban reserves are intended to accommodate the next 50 years' worth of growth, no urban reserve extends further than 2.5 miles from the then-UGB. Reserves Ord Findings, pp. 3-5; Rec 615-617. When Metro analyzed the urban reserves for possible expansion of the UGB, these same characteristics loomed large in the analysis.¹⁸ Cap Ord Rec 7270-7280.¹⁹ UGB Ordinance Findings, pp.1-10 (Attachment 1 here); 11-12; 14; 15-16; 19-20; 23.

The relatively cursory review of all 28,256 acres of urban reserves that led to detailed review of the subset 9,800 acres must be considered in context:

- Metro needed only 2,000 acres for UGB expansion
- In the first stage of analysis, Metro emphasized and sorted the urban reserves for the characteristics that made the land suitable for its expressed needs for large tracts for industrial users and compact development forms, consistent with OAR 660-024-0060(5)

¹⁷ Area 1B pp. 18-21; Area 2A pp. 21-23; Areas 3B, 3C, 3D, 3F, 3G pp.23-26; Areas 4A, 4B, 4C pp. 26-31; Areas 4D, 4H, 5G, 5H pp. 31-34; Areas 4E, 4F, 4G pp. 68-70; Area 5A pp. 70-71; Area 5B pp. 71-72; Area 5D pp. 73-74; Area 5F pp. 74-75; Area 6A pp. 75-76; Area 6B pp. 76-77; Area 6C pp. 77-78; Area 6D pp. 78-79; Area 7A pp. 79-80; Area 7B pp. 80-81 and 127-148; Area 7C pp. 81-83; Area 7E pp. 83-84; Area 7I pp. 84-85; Area 8A pp. 85-86; Area 8B pp. 86-87 and 148-163; Area 8C pp. 87-90.

¹⁸ See "Site Characteristics and Goal 14 Location Factors", May 4, 2012, handed to LCDC at its May 10 hearing.

¹⁹ Community Investment Strategy, Volume 2, Appendix 8: "Preliminary Analysis of Potential Urban Growth Boundary Expansion Areas", August 10, 2010.

- Metro relied upon three year’s worth of careful evaluation of possible urban reserves using factors in the reserves rules that are quite similar to the location factors of Goal 14 – analysis completed only six months prior to completion of the UGB analysis.

In this context, omission by Metro of more detailed analysis under the location factors of Goal 14 of particular areas of urban reserves among the 18,456 acres not studied in detail (28,256 minus 9,800) is minor in nature. On the whole, Metro’s analysis conforms with the purposes of Goal 14. Metro’s selection of 9,800 acres from the 28,256 acres of urban reserves for more detailed review under the location factors of Goal 14 complies with the goal and the rules.

4. Application of the Location Factors of Goal 14 and of Metro Code Section 3.07.1425C to Areas Studied in Detail for UGB Expansion

In its April 19, 2012, “Report and Response to Objections”, the department expressed concern that Metro had mixed its consideration of how the areas under consideration for UGB expansion rated under the “location factors” of Goal 14 and Metro Code Section 3.07.1425C. The department worried that Metro’s mixing treatment of its own factors with those in Goal 14 made it difficult to ensure Metro’s choices of land to add to the UGB was based upon the location factors.

Goal 14, as the Commission and appellate courts have interpreted it, requires a local government to consider four location factors in when it chooses areas to include in the UGB from among all the areas in a particular “priority” [ORS 197.298(1)]. The goal also requires the local government to explain its choices by referring to its consideration of the four factors. Goal 14 does not prohibit a local government from considering other factors in its analysis. A recent case confirming that Goal 14 requires consideration of the four location factors also implicitly endorsed use by local governments of policies in their comprehensive plans when selecting lands for addition to the UGB:

“Once candidate lands have been located under ORS 197.298 (i.e., the higher-priority lands that have been identified as adequate to satisfy part of a land need and any remaining lower-priority lands that exist in quantities sufficient to accommodate the remaining need), the location of the boundary changes is determined by the full and consistent application of the Goal 14 locational factors, the Goal 2 exception criteria²⁰ to those candidate lands, and relevant plan and ordinance criteria.” *1000 Friends of Oregon, et al. v. LCDC and City of McMinnville*, 244 Or App 239, 266 (2011).

Metro has policies in its Regional Framework Plan, given effect in its land use regulations governing expansion of the UGB (Metro Code 3.07.1425C), that must be considered when Metro expands the UGB. There is no express or implied limitation in state law on Metro’s consideration of its own factors. Metro did not err by considering its own factors.

²⁰ Amendments to Goal 14 in 2005 removed the reference to the exception process and criteria at ORS 197.732. This case involves a review of a UGB expansion commences and reviewed under pre-amendment Goal 14.

The question remains whether Metro met the Goal 14 requirement to show its choice of land was based upon its consideration of the location factors. Metro need not show that it based its decision on the location factors to the exclusion of consideration of its own factors.

Examination of Metro's findings shows that the Metro Council applied and considered the four location factors as required by Goal 14, fully and consistently. The Findings made in the UGB Ordinance (No. 11-1264B) display analysis of each area added to the UGB under each location factor, followed by analysis under additional factors from the Metro Code. The Findings then explain the conclusions reached by the Council, comparing the selected areas with those not selected. It is apparent from those findings that the Council's selection was grounded in the Goal 14 location factors. For example, here is the Council's reasoning for selecting the South Hillsboro area for the UGB:

“Overall Conclusions for South Hillsboro

The Council concludes that SHA measures up better under the applicable factors for providing housing capacity than any area studied. With its large parcels, few owners, flat topography, a willing and capable city, developers ready to contribute millions of dollars to the capital cost of infrastructure, its presence on conflicted agricultural land, the large boundary it shares with the UGB and the Reserves Golf Course, its suitability for a compact, mixed-use, pedestrian and bicycle-friendly and transit-supportive development pattern, SHA is more likely than any area considered to become a “great community” and achieve the Outcomes set forth in the RFP.

Compared to SHA, Gresham East has lower suitabilities for water, sewer and transportation services; and small parcels, many with development, that will make urbanization more difficult. Maplelane has the same disadvantages, but also has a high ratio of constrained to unconstrained gross vacant land, which limits its residential capacity. Beaver Creek Bluffs has the same difficulties as Maplelane, but a higher constrained land ratio. The Norwood area has lower water, sewer and transportation suitability than SHA. I-5 East has a high ratio of constrained to unconstrained land, including steep slopes that would fracture urban development in its northern portion, and many small parcels, 85 percent of which are improved. Elligsen, too, has much constrained land, difficult infrastructure issues and no easy way to ensure compatibility with agriculture to the south. The Advance area suffers from the same disadvantages. Sherwood West has a low ratio of constrained to unconstrained land, but lower suitabilities for water, sewer and transportation services than SHA. Urbanization of Sherwood West would likely divert the city's effort from enhancing its town center. Sherwood South has a high ratio of constrained to unconstrained land, a large number of small parcels with improvements and difficult infrastructure issues. Efforts to urbanize it, too, may divert Sherwood's effort to enhance its town center.

The Tonquin area, a quarry, has low suitability for housing and infrastructure issues. Roy Rogers West (Urban Reserve Area 6C) measures well under several factors, but has no easy way to ensure compatibility with agriculture to the west

and south. Its rural residential development pattern will make it more difficult to urbanize in a compact, efficient pattern.

Compared to SHA, the Vandermost Road area has a high ratio of constrained to unconstrained land and likely moderate to high adverse economic, social and energy consequences from urbanization. The Forest Grove North area has high suitability for services and medium sized parcels, suitable for urbanization (though not nearly as large as South Hillsboro). But it borders an extensive block of intensely farmed land with no effective buffers, rendering it incompatible with nearby agricultural practices. The Forest Grove North Purdin Road area shows lower suitability for public services than South Hillsboro. Its parcelization pattern makes it conducive to compact and efficient development. But like the Forest Grove North area, it borders an important agricultural area; urbanization there would present larger compatibility challenges than urbanization of SHA. The Forest Grove South area is small (37 acres) and sought by the city for industrial use in conjunction with an industrial site (25 acres) inside the UGB. It is well-suited for efficient and economically-serviced development. But, like the Forest Grove North study areas, Forest Grove South borders an extensive block of important farmland to the south, west and east; the impact of urban development on that block of agricultural land concerns the Council. Cornelius East has high suitability for public services and it presents few compatibility problems or adverse consequences. But its small parcels with residential development would make it very difficult to achieve efficient, compact urban development. The Cornelius South area has the same advantages as Cornelius East. Like the Forest Grove study areas, however, Cornelius South borders an extensive block of important farmland (south and east); the impact of urban development on that block of agricultural land concerns the Council.

The Hillsboro North-Jackson School Road area is highly suitable for efficient, compact development. But it is separated from the UGB (by the Hillsboro North area, added to the UGB by this ordinance) and, hence, not immediately adjacent to urban services as is the South Hillsboro area. It is, itself, important farmland and it borders an extensive block of important farmland, which is not protected from urbanization by North-Jackson School Road or by buffering natural or built features. The Shute Road Interchange area is also highly suitable for efficient, compact development. But it faces farmland compatibility issues. Given its location across Highway 26 and some distance from the Hillsboro and Tanasbourne/Amberglen Regional Centers, it is not likely to contribute to enhancement of those centers. UGB Ord Rec 588-705.”

The Commission would be concerned if Metro’s reasoning elevated its code factors over the Goal 14 factors in its selections. But, as can be seen from comparing the factors²¹, Metro’s factors complement the location factors. The Commission would also be concerned if Metro’s reasoning under its code factors led it to lands it would not reach using the location factors. As can be seen from that reasoning, however, application by the Council of its code factors was consistent with application of the location factors, and did not lead the Council to choose the “wrong” lands.

Metro properly applied the location factors and complied with Goal 14 and the Goal 14 rule.

²¹ Location Factor: Efficient accommodation of land needs
 Code Factor: Equitable and efficient distribution of housing and jobs
 Code Factor: Contribution to the purposes of Centers and Corridors
 Location Factor: Orderly and economic provision of public facilities and services
 Code Factor: Contribution to the purposes of Centers and Corridors
 Location Factor: Comparative EEES Consequences
 Code Factor: Equitable and efficient distribution of housing and jobs
 Code Factor: Avoidance of conflict with significant fish and wildlife habitat
 Code Factor: Clear transition between urban and rural lands
 Location Factor: Compatibility of proposed uses with agricultural and forest activities
 Code Factor: Protection of farmland most important to commercial agriculture
 Code Factor: Clear transition between urban and rural lands

Exhibit B to Ordinance No. 11-1255

REASONS FOR DESIGNATION OF URBAN AND RURAL RESERVES

I. BACKGROUND

The 2007 Oregon Legislature authorized Metro and Clackamas, Multnomah and Washington Counties (“partner governments”) to designate urban reserves and rural reserves following the process set forth in ORS 195.137 – 195.145 (Senate Bill 1011) and implementing rules adopted by the Land Conservation and Development Commission (LCDC) (OAR 660 Division 27). The Legislature enacted the new authority in response to a call by local governments in the region to improve the methods available to them for managing growth. After the experience of adding over 20,000 acres to the regional urban growth boundary (UGB) following the soil-capability-based priority of lands in ORS 197.298, cities and the partner governments wanted to place more emphasis on the suitability of lands for sustainable urban development, longer-term security for agriculture and forestry outside the UGB, and respect for the natural landscape features that define the region.

The new statute and rules make agreements among the partner governments a prerequisite for designation of urban and rural reserves. The remarkable cooperation among the local governments of the region that led to passage of Senate Bill 1011 and adoption of LCDC rules continued through the process of designation of urban reserves by Metro and rural reserves by Clackamas, Multnomah and Washington Counties. The partners’ four ordinances are based upon the separate, formal intergovernmental agreements between Metro and each county that are part of our record, developed simultaneously following long study of potential reserves and thorough involvement by the public.

The four governments submitted their ordinances with designated reserves to LCDC in periodic review on June 23, 2010. On October 29, 2010, the Commission gave its oral approval to the reserves designated in Clackamas and Multnomah Counties and to the rural reserves and most of the urban reserves in Washington County. The Commission, however, rejected the designation of Urban Reserve 7I, north of Cornelius, and directed reconsideration of Urban Reserve 7B, north of Forest Grove. The Commission authorized Metro and Washington County to consider designating as urban reserve, or leaving undesignated, land the County had previously designated rural reserve or left undesignated. In order to provide flexibility, the Commission also returned the rural reserves in Washington County for further consideration.

Washington County and Metro responded to LCDC’s oral decision by revising the intergovernmental agreement between them and adopting ordinances amending their respective comprehensive plan and regional framework plan maps (Washington County Ordinance No. 740; Metro Ordinance No. 11-1255). The ordinances made the following changes:

- The designation of Area 7I as urban reserve (623 acres) was removed
- 263 acres of Area 7I were designated rural reserves
- 360 acres of Area 7I were left undesignated

- The urban reserve designation of the 28-acre portion of Area 7B that lies east and north of Council Creek was removed; the portion was left undesignated
- 352 acres of undesignated land north of Highway 26, south of West Union Road, east of Groveland Road and west of Helvetia Road were designated urban reserve
- The rural reserve designation of 383 acres of Rural Reserve 6E south of Rosedale Road, west of 209th Avenue and north of Farmington Road was removed; the portion was left undesignated.

Metro Supp Rec. __ (SR 2).

These revisions reduced the acres of urban reserves in Washington County by 299 acres, reduced the acres of rural reserves by 120 acres and increased the acres adjacent to the UGB left undesignated by 391 acres, all compared with the reserves submitted to LCDC in June, 2010. Overall, there are 13,525 acres of urban reserves and 151,209 acres of rural reserves in Washington County, in part reflecting refinements of boundaries as they relate to street rights-of-way, floodplains and improved tax lot alignments. Metro Supp Rec. __ (SR 3).

II. OVERALL CONCLUSIONS

With adoption of Metro Ordinance No. 11-1255, Metro has designated 28,256 gross acres as urban reserves, including urban reserves in each county. Metro Supp Rec. __ (SR 3). These lands are now first priority for addition to the region's UGB when the region needs housing or employment capacity. As indicated in new policy in Metro's Regional Framework Plan in Exhibit A to Ordinance No. 10-1238A, the urban reserves are intended to accommodate population and employment growth for 50 years, to year 2060.

Clackamas County Ordinance No. ZDO-233 designates 68,713 acres as rural reserves in Clackamas County. Multnomah County Ordinance No. 2010-1161 designates 46,706 acres as rural reserves in Multnomah County. Washington County Ordinance No. 740, which revised the county's designation of rural reserves following LCDC's remand of urban and rural reserves in the county, designates 151,209 acres of rural reserves. Metro Supp Rec. __ (SR 2). As indicated in new policies in the Regional Framework Plan and the counties' Comprehensive Plans, these rural reserves – 266,628 acres in total - are now protected from urbanization for 50 years. Metro Supp. Rec. __ (SR 2). The governments of the region have struggled with the urban-farm/forest interface, always searching for a "hard edge" to give farmers and foresters some certainty to encourage investment in their businesses. No road, stream or floodplain under the old way of expanding the UGB offers the long-term certainty of the edge of a rural reserve with at least a 50-year lifespan. This certainty is among the reasons the four governments chose the longer, 50-year, reserves period.

The region's governments have also debated how best to protect important natural landscape features at the edges of the urban area. The partners' agreements and these ordinances now identify the features that will define the extent of outward urban expansion.

The region's urban and rural reserves are fully integrated into Metro's Regional Framework Plan and the Comprehensive Plans of Clackamas, Multnomah and Washington counties. Metro's plan includes a map that shows urban and rural reserves in all three counties. Each of the county plans includes a map that shows urban and rural reserves in the county. The reserves shown on each county map are identical to the reserves shown in that county on the Metro map. Each of the four plans contains new policies that ensure accomplishment of the goals for the reserves set by the four local governments and by state law. These new policies are consistent with, and carry out, the intergovernmental agreements between Metro and the three counties signed in February, 2010, and the supplemental agreement between Metro and Washington County signed on March 15, 2011. Metro Supp. Rec. ____.

Together, these reserves signal the region's long-term limits of urbanization, its commitment to stewardship of farmland and forests, and its respect for the natural landscape features that give the people of the region their sense of place. Urban reserves, if and when added to the UGB, will take some land from the farm and forest land base. But the partners understood from the beginning that some of the very same characteristics that make an area suitable for agriculture also make it suitable for industrial uses and compact, mixed-use, pedestrian and transit-supportive urban development. The most difficult decisions made by the four governments involved Foundation Agricultural Land¹ near the existing UGB and the circumstances in which this land should be designated as urban reserve to accommodate growth in a compact form and provide opportunities for industrial development, difficult or impossible on steep slopes. Metro designated 15 areas composed predominantly of Foundation Land as urban reserve, totaling 11,551 acres.²

Some important numbers help explain why the partners came to agree that the adopted system, in its entirety, best achieves this balance. Of the total 28,256 acres designated urban reserves, approximately 13,624 acres are Foundation (11,551 acres) or Important (2,073 acres) Agricultural Land. This represents only four percent of the Foundation and Important Agricultural Land studied for possible urban or rural reserve designation. If all of this land is added to the UGB over the next 50 years, the region will have lost four percent of the farmland base in the three-county area. Metro Supp. Rec. __ (SR 3; Att. 3).

There is a second vantage point from which to assess the significance for agriculture of the designation of urban reserves in the three-county region: the percentage of land zoned for exclusive farm use in the three counties that is designated urban reserve. Land zoned EFU³ has

¹ Those lands mapped as Foundation Agricultural Land in the January, 2007, Oregon Department of Agriculture report to Metro entitled "Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands.

² 1C (East of Gresham, portion); 1F (Boring); 5A (Sherwood North); 5B (Sherwood West); 6A (Hillsboro South, portion); 6B (Cooper Mt. Southwest); 6C (Roy Rogers West); 6D (Beef Bend South); 7B (Forest Grove North); 7C (Cornelius East); 7D (Cornelius South); 7E (Forest Grove South); 8A (Hillsboro North); 8B (Shute Road Interchange and new Area D); 8C (Bethany West)

³ Includes all farm zones acknowledged to comply with statewide planning Goal 3, including Washington County's AF-20 zone.

emerged over 35 years of statewide planning as the principal land base for agriculture in the counties, and is protected for that purpose by county zoning. The inventory of Foundation and Important Agricultural Lands includes land that is "exception land", no longer protected for agriculture for farming. Of the 28,256 acres designated urban reserves, some 13,746 acres are zoned EFU. Even including the 3,532 acres of these EFU lands that are classified by ODA as "conflicted", these 13,746 acres represent slightly more than five percent of all land zoned EFU (266,372 acres) in the three counties. If the "conflicted" acres are removed from consideration, the percentage drops to less than four percent. Metro Supp.Rec.__(SR 3; Att 3).

A third vantage point adds perspective. During an approximately 30-year period leading to establishment of the statewide planning program and continuing through the acknowledgement and early implementation of county comprehensive plans, the three counties lost more than 150,000 acres of farmland. Metro Supp. Rec. _(SR 3; Att 3). By contrast, if all the zoned farmland that is designated urban reserve is ultimately urbanized, the regional will have lost only 13,746 acres over 50 years.

If the region's effort to contain urban development within the existing UGB and these urban reserves for the next 50 years is successful, the UGB will have accommodated an estimated 74 percent increase in population on an 11-percent increase in the area within the UGB. No other region in the nation can demonstrate this growth management success. Most of the borders of urban reserves are defined by a 50-year "hard edge" of 266,628 acres designated rural reserves, nearly all of which lies within five miles of the existing UGB. Of these rural reserves, approximately 248,796 acres are Foundation or Important Agricultural Land. Metro Supp. Rec.__(SR 3; Att 3).

Why did the region designate *any* Foundation Agricultural Land as urban reserve? The explanation lies in the geography and topography of the region, the growing cost of urban services and the declining sources of revenues to pay for them, and the fundamental relationships among geography and topography and the cost of services. The region aspires to build "great communities." Great communities are those that offer residents a range of housing types and transportation modes from which to choose. Experience shows that compact, mixed-use communities with fully integrated street, pedestrian, bicycle and transit systems offer the best range of housing and transportation choices. *State of the Centers: Investing in Our Communities*, January, 2009. Metro Rec.181-288. The urban reserves factors in the reserves rules derive from work done by the region to identify the characteristics of great communities. Urban reserve factors (1), (3), (4),and (6)⁴ especially aim at lands that can be developed in a compact, mixed-use, walkable and transit-supportive pattern, supported by efficient and cost-effective services. Cost of services studies tell us that the best landscape, both natural and

⁴ (1) Can be developed at urban densities in a way that makes efficient use of existing and future public and private infrastructure investments;
(3) Can be efficiently and cost-effectively service with public schools and other urban-level public facilities and services by appropriate and financially capable providers;
(4) Can be designed to be walkable and service with a well-connected system of streets, bikeways, recreation trails and public transit by appropriate services providers;
(6) Includes sufficient land suitable for a range of needed housing types.

political, for compact, mixed-use communities is relatively flat, undeveloped land. *Core 4 Technical Team Preliminary Analysis Reports for Water, Sewer and Transportation*, Metro Rec. 1163-1187; *Regional Infrastructure Analysis*, Metro Rec. 440-481.

The region also aspires to provide family-wage jobs to its residents. Urban reserve factor (2) directs attention to capacity for a healthy economy.⁵ Certain industries the region wants to attract prefer large parcels of flat land. Staff Report, June 9, 2010, Metro Rec. 172-178. Water, sewer and transportation costs rise as slope increases. *Core 4 Technical Team Preliminary Analysis Reports for Water, Sewer and Transportation*, Metro Rec. 1163-1187; *Regional Infrastructure Analysis*, Metro Rec. 440-481. Converting existing low-density rural residential development into compact, mixed-use communities through infill and re-development is not only very expensive, it is politically difficult. Metro Rec. 289-300.

Mapping of slopes, parcel sizes, and Foundation Agricultural Land revealed that most flat land in large parcels without a rural settlement pattern at the perimeter of the UGB lies in Washington County, immediately adjacent to Hillsboro, Cornelius, Forest Grove, Beaverton, and Sherwood. These same lands provide the most readily available supply of large lots for industrial development. *Business Coalition Constrained Land for Development and Employment Map*, Metro Rec. 301; 1105-1110. Almost all of it is Foundation Agricultural Land. Metro Supp. Rec. (SR 3). Had the region been looking only for the best land to build great communities, nearly all the urban reserves would have been around these cities. It is no coincidence that these cities told the reserves partners that they want significant urban reserves available to them; while most other cities told the partners they want little or no urban reserves. *Washington County Cities' Pre-Qualified Concept Plans*, WashCo Rec. 3036-3578. These facts help explain why there is more Foundation Agricultural Land designated urban reserve in Washington County than in Clackamas or Multnomah counties. Had Metro not designated some Foundation Land as urban reserve in Washington County, it would not have been possible for the region to achieve the "livable communities" purpose of reserves in LCDC rules [OAR 660-027-0005(2)].

Several urban reserves factors focus on the efficient, cost-effective installation, operation and maintenance of public services to urban reserves once they are included within the UGB.⁶ Urban reserve factor (6) calls for land suitable for needed housing types. The partners began the analysis by examining lands within five miles of the UGB. Most of these lands initially studied are beyond the affordable reach of urban services. As noted above, water, sewer and transportation costs rise as slope increases. *Core 4 Technical Team Preliminary Analysis Reports for Water, Sewer and Transportation*, Metro Rec. 1163-1187; *Regional Infrastructure Analysis*, Metro Rec. 440-481. Not only does most of the Important Agricultural Land and the Conflicted Agricultural Land within five miles of the UGB exhibit steeper slopes than the Foundation Land close to the UGB; these non-Foundation Lands also exhibit rural residential development patterns on smaller parcels ("exception lands"). Metro Supp. Rec. __ (SR 3; Att 5); WashCo Rec. 1891-1894; 2905. With one exception (small portion of Urban Reserve 1F), designated urban reserves lie within two miles of the UGB. Metro Supp. Rec. __ (SR, Att 4).

⁵ (2) Includes sufficient development capacity to support a healthy economy.

⁶ Urban Reserve factors (1) (efficient use of public infrastructure); (3) (efficient and cost-effective public services); (4) (walkable, bikable and transit-supportive).

Despite these geopolitical and cost-of-services realities, the reserves partners designated extensive urban reserves that are *not* Foundation Agricultural Lands in order to meet the farm and forest land objectives of reserves, knowing these lands will be more difficult and expensive to urbanize. The following urban reserves are principally Conflicted and Important Agricultural Land:

- Urban Reserve 1D east of Damascus and south of Gresham (2,716 acres), ClackCo Rec. 1723;
- Urban Reserve 2A south of Damascus (1,239 acres), ClackCo Rec. 1722;
- Urban Reserves 3B, C, D, F and G around Oregon City (2,232 acres), ClackCo Rec. 1718-1720;
- Urban reserves 4A, B and C in the Stafford area (4,699 acres), ClackCo Rec. 1716;
- Urban reserves 4D, E, F, G and H southeast of Tualatin and east of Wilsonville (3,589 acres), ClackCo Rec. ___;
- Urban Reserve 5F between Tualatin and Sherwood (572 acres); WashCo Rec. 3517; 2998;
- Urban Reserve 5G west of Wilsonville (203 acres) ClackCo Rec. 711-712; and
- Urban Reserve 5D south of Sherwood (447 acres), WashCo Rec. 3481; 2998.

These non-Foundation Lands designated urban reserve, which total approximately 15,700 acres, (55 percent of all lands designated urban reserve), are the most serviceable among the non-Foundation Lands within the initial study area. Metro Supp Rec. ___(SR, Att 3); WashCo Re. 3006-3010; 3015.

Many areas of Important and Conflicted Agricultural Lands were not designated urban reserve in part because the presence of steep slopes, bluffs, floodplains, streams and habitat, limiting their suitability or appropriateness for urbanization:

- Rural Reserve 1B (West of Sandy River): the Sandy River Canyon and the county's scenic river overlay zone. MultCo Rec. 2961-2965; 2973-2985;
- Rural Reserve 2B (East Clackamas County): steep bluffs above the Clackamas River. ClackCo Rec. 560-563; 568-571;
- Rural Reserve 3E (East of Oregon City): steep slopes along Abernethy, Clear and Newell Creeks. ClackCo Rec. 748-755;
- Rural Reserve 3H (South of Oregon City): steep slopes drop to Beaver and Parrot Creeks. ClackCo. Rec. 557; 1718;
- Rural Reserve 4I (Pete's Mtn.): steep slopes. ClackCo Rec. 741-743;
- Rural Reserve 5C (East Chehalem Mtns): steep slopes and floodplain of Tualatin River; WashCo Rec. 2998-3027;
- Rural Reserve 5I (Ladd Hill): steep slopes and creek traverses. ClackCo. Rec. 592-595;
- Rural Reserve 6E (Central Chehalem Mtns.): steep slopes and floodplain of Tualatin River. WashCo Rec. 2998-3027;
- Rural Reserve 7G (West Chehalem Mtns.): steep slopes and floodplain of Tualatin River. WashCo Rec. 2997; 3006-3010; 3027;

- Rural Reserve 7H (West Fork of Dairy Creek); steep slopes on David Hill. WashCo. Rec. 3013; 3029; 3107;
- Rural Reserves 9A-9C (Powerlines/Germantown Road-South): steep slopes, many stream headwaters and courses. MultCo. Rec. 11; 329-330; 3004-3015;
- Rural Reserve 9D (West Hills South): steep slopes, many stream headwaters and courses. MultCo Rec. 2993-3033.

Metro Supp Rec. __ (SR,Att 4).

Urban reserve factors (5), (7) and (8)⁷ seek to direct urban development away from important natural landscape features and other natural resources. Much of the Important and some Conflicted Agricultural Lands are separated from the UGB by, or include, important natural landscape features or rural reserves on Foundation or Important Agricultural Land:

- Rural Reserve 1B (West of Sandy River): the Sandy River Canyon (Wild and Scenic River). MultCo Rec. 2961-2965; 2973-2985;
- Rural Reserve 2B (East Clackamas County): Clackamas River and canyons of Deep, Clear and Newell Creeks. ClackCo. Rec. 1722;
- Rural Reserve 3E (East of Oregon City): Willamette River and canyons of Abernethy, Clear and Newell Creeks. ClackCo Rec. 560-563;
- Rural Reserve 3H (South of Oregon City): Willamette Narrows, Canemah Bluffs and canyons of Beaver and Parrot Creeks. ClackCo. Rec. 553-554;
- Rural Reserve 4I (Pete's Mtn.): Willamette Narrows on eastern edge. ClackCo. Rec. 596;
- Rural Reserve 5C (East Chehalem Mtns.): Chehalem Mtns., floodplain of Tualatin River and Tualatin River National Wildlife Refuge. WashCo Rec. 2988-3027; 9677-9679;
- Rural Reserve 5I (Ladd Hill): Parrett Mtn., Willamette River, Tonquin Geological Area. ClackCo. Rec. 592-595;
- Rural Reserve 6E (Central Chehalem Mtns.): Chehalem Mtns., floodplain of Tualatin River. WashCo Rec. 2998-3027;
- Rural Reserve 7G (West Chehalem Mtns.): Chehalem Mtns., floodplain of Tualatin River. WashCo Rec. 3029; 3095; 3103;
- Rural Reserves 9A-9C (Powerlines/Germantown Road-South): steep slopes (Tualatin Mountains), stream headwaters (Abbey Creek and Rock Creek) and courses. MultCo. Rec. 11; 329-330; 3004-3015; 3224-3225; 3250-3253; 9322-9323;
- Rural Reserve 9D (West Hills South): steep slopes, many stream headwaters (Abbey Creek and Rock Creek) and courses. MultCo Rec. 2993-3033.

Metro Supp. Rec. __ (SR 4-5; Att 10).

⁷ (5) Can be designed to preserve and enhance natural ecological systems;

(7) Can be developed in a way that preserves important natural landscape features included in urban reserves;

(8) Can be designed to avoid or minimize adverse effects on farm and forest practices, and adverse effects on important natural landscape features, on nearby land including land designated as rural reserves.

Third, much of the Important and Conflicted Agricultural Lands rates lower against the urban reserves factors in comparison to areas designated urban reserve, or remain undesignated for possible designation as urban reserve if the region's population forecast proves too low:⁸

- Clackamas Heights, ClackCo Rec. 1721;
- East Wilsonville, ClackCo Rec. 1715;
- West Wilsonville, ClackCo Rec. 1713;
- Southeast of Oregon City, ClackCo Rec. 1719;
- Southwest of Borland Road, ClackCo Rec. __;
- Between Wilsonville and Sherwood, ClackCo Rec. __;
- Powerline/Germantown Road-South, MultCo Rec. 2909-2910.

Lastly, some of the Important and Conflicted Agricultural Lands lie adjacent to cities in the region that have their own UGBs and want their own opportunities to expand over time:

- Estacada
- Sandy

The partners also considered the rural reserve factors when considering whether to designate Foundation Agricultural Land as urban reserve. The first set of rural reserve factors focuses on the suitability and capability of land for agriculture and forestry. The factors in this set that address agricultural suitability and capability derive from the January, 2007, Oregon Department of Agriculture report to Metro entitled "Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands." All of the Foundation Lands designated urban reserve are potentially subject to urbanization [rural factor (2)(a)] due to their proximity to the UGB and suitability for urbanization, as described above. See, e.g., WashCo Rec. 2984-2985; 2971-2972; 3013-3014. All of the Foundation Lands designated urban reserve are also capable of sustaining long-term agricultural or forest operations [factor (2)(b)]. WashCo rec. 2972-2973; 2985; 3015. Similarly, all of the Foundation Lands designated urban reserve have soils and access to water that render them suitable [factor (2)(c)] to sustain agriculture. See, e.g., WashCo Rec. 2972-2975; 2985; 2998; 3016-3018. These lands also lie in large blocks of agricultural land and have parcelization, tenure and ownership patterns and agricultural infrastructure that make them suitable for agriculture. WashCo Rec. 2975; 2985; 3019-3024; 3027. The identification of these lands as Foundation Agricultural Land by the Oregon Department of Agriculture is a reliable general source of information to support these findings. See also WashCo Rec. 2976-2983; 3019-3025.

Notwithstanding these traits that make these lands suitable for agriculture and forestry, some of the urban reserves on Foundation Land rate lower on the rural reserve factors than Foundation Land *not* designated urban reserve. WashCo Rec. 2978; 3025. Urban Reserves 6A (portion),

⁸ "Retaining the existing planning and zoning for rural lands (and not applying a rural or an urban reserves designation) is appropriate for lands that are unlikely to be needed over the next 40 years, or (conversely) that are not subject to a threat of urbanization." Letter from nine state agencies to the Metro Regional Reserves Steering Committee, October 14, 2009, page 15.

6B, 6C, 6D, 5A, 5B and 1F lie within Oregon Water Resources Department-designated Critical or Limited Groundwater Areas and have less ready access to water [factor (2)(c)]. WashCo Rec. 2294-2302; 2340; 2978-2979; 3019-3023; 3025; 3058-3061; 3288; 3489-3490. Metro Supp. Rec. (SR 3-4; Att7). Urban Reserves 8A, 8B (with new Area D, 6A (portion), 6B, 6D (portion), 5A, 5B, 1C and 1D are not within or served by an irrigation district. Metro Supp. Rec. (SR 3; Att 6). WashCo Rec. 2340; 3019-3023; 3025 Urban Reserve 6A contains the Reserves Vineyards Golf Course. Metro Supp. Rec. (SR 3).

The second set of rural reserve factors focuses on natural landscape features. All of the Foundation Lands designated urban reserve are potentially subject to urbanization [factor (3)(a)] due to their proximity to the UGB and their suitability for urbanization, as described above. The identification of these lands as Foundation Agricultural Land by the Oregon Department of Agriculture is a reliable general source of information to support this finding. Because urban reserves are intended for long-term urbanization, the partners were careful to exclude from urban reserves large tracts of land constrained by natural disasters or hazards incompatible with urban development. Metro Rec. 301; 1105-1110; WashCo Rec. 2986. Small portions of these urban reserves are vulnerable to hazards, but city land use regulations will limit urban development on steep slopes, in floodplains and areas of landslides once the lands are added to the UGB. Metro Supp. Rec. (SR, Att 10); WashCo Rec. 2986.

Little of these Foundation Lands are mapped as significant fish, plant or wildlife habitat [factor (3)(c)], the mapping of which is largely subsumed on the landscape features map. For the same reasons, little of these lands are riparian areas or wetlands. As with all lands, these lands are important for protection of water quality. But the lands are subject to local, regional, state and federal water quality regulations. See, e.g., WashCo Rec. 2986-2987.

There are several inventoried natural landscape features [factor (3)(e)] within the Foundation Lands designated urban reserve. Rock Creek flows through a portion of Urban Reserve 8C (Bethany West). The IGA between Washington County and Metro included a provision to limit development on approximately 115 acres of constrained land within the portion of the watershed in 8C, through application of the county's Rural/Natural Resources Plan Policy 29 and Clean Water Services programs developed to comply with Title 13 (Nature in Neighborhoods) of Metro's Urban Growth Management Functional Plan. Metro Rec. (SR, Att 10). Urban Reserve 6B includes portions of the slopes of Cooper Mountain. Metro's Cooper Mountain Nature Park lies within this area and protects much of the mountain's slopes. Metro Supp. Rec. (SR, Att 10). Urban Reserve 6D includes a segment of Tualatin River floodplain. King City will apply its floodplains ordinance to limit development there. WashCo. Rec. 3462-3463; Metro Supp. Rec. (SR, Att 10). There are such inventoried natural landscape features at the edges of Urban Reserves 6A (South Hillsboro, Tualatin River), 6C (Roy Rogers West, Tualatin River), 6D (Beef Bend, Tualatin River), 7C (Cornelius East, Dairy Creek), 7D (Cornelius South, Tualatin River), 7E (Forest Grove South, Tualatin River and Lower Gales Creek) and 8A (Hillsboro North, McKay Creek); Metro Supp. Rec. (SR, Att 10). These features serve as edges to limit the long-term extent of urbanization and reduce conflicts with rural uses [factor (3)(f)].

Urban Reserves 1F, 8A and 8B (new Area D) lessen the separation [factor (3)(g)] between the Metro urban area and the cities of Sandy and North Plains, respectively. But significant

separation remains (Sandy: approximately 9,000 feet; North Plains: approximately 2,000 feet). Metro Supp. Rec. (SR, Att 2); WashCo Rec. 2987. Finally, because private farms and woodlots comprise most of these Foundation Lands, they do not provide easy access to recreational opportunities as compared to Important and Conflicted Lands.

As indicated above and in county findings in sections VI through VIII, these 15 urban reserves on Foundation Agricultural Land rate highly for urban reserves and rural reserves. In order to achieve a balance among the objectives of reserves, Metro chose these lands as urban reserves rather than rural reserves. The characteristics described above make them the best lands for industrial use and for compact, mixed-use, pedestrian-friendly and transit-supportive communities. Designation of these areas as urban reserve will have little adverse impact on inventoried natural landscape features. Notwithstanding the loss of these lands over time, urbanization of these lands will leave the agricultural and forest industries vital and viable in the region.

The record of this two and one-half-year effort shows that not every partner agreed with all urban reserves in each county. But each partner agrees that this adopted system of urban and rural reserves, in its entirety, achieves the region's long-range goals and a balance among the objectives of reserves: to accommodate growth in population and employment in sustainable and prosperous communities and neighborhoods, to preserve the vitality of the farms and forests of the region, and to protect defining natural landscape features. The partners are confident that this system of reserves will allow the continuation of vibrant and mutually-reinforcing farm, forest and urban economies for the next 50 years. And the partners agree this system is the best system the region could reach by mutual agreement.

III. OVERALL PROCESS OF ANALYSIS AND PUBLIC INVOLVEMENT

A. Analysis and Decision-Making

The three counties and Metro began reserves work as soon as LCDC adopted the new rules on reserves (OAR Division 27). The four governments formed committees and began public involvement to raise awareness about reserves and help people learn how to engage in the process. Each of the four governments selected one of its elected officials to serve on the "Core 4", established to guide the designation process and formulate recommendations to the county boards and the Metro Council. The four governments also established a "Reserves Steering Committee" (RSC) to advise the Core 4 on reserves designation. The RSC represented interests across the region - from business, agriculture, social conservation advocacy, cities, service districts and state agencies (52 members and alternates).

The four governments established an overall Project Management Team (PMT) composed of planners and other professions from their planning departments. Each county established an advisory committee to provide guidance and advice to its county board, staffed by the county's planning department.

As part of technical analysis, staff gathered providers of water, sewer, transportation, education and other urban services to consider viability of future service provision to lands within the study area. The parks and open space staff at Metro provided guidance on how best to consider natural features using data that had been deeply researched, broadly vetted and tested for social and political acceptance among Willamette Valley stakeholders (Oregon Wildlife Conservation

Attachment 2

BORING (1D/1F)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

Making the Greatest Place – Strategies for a sustainable and prosperous region – A report from Metro’s Chief Operating Officer – Overview, Recommendation, Sections 3A, 3B, 3D and 3E, September 15, 2009, Capacity Ordinance record, Ordinance 10-1244B & 11-11252A, pages 2676-2677.

Clackamas County Urban and Rural Reserves Record – Report Disk 1/3-BCC-Indexed/6 Sept 10 Business Mtg/12-BCCRecommendationpacketforRSC092309, page 12

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 11-14

Letter from Dana Krawczuk, Ball Janik LLP, dated March 13, 2009, regarding the request to consider designating the SW corner of Highway 26 and Highway 212 as an urban reserve candidate area, noting that this urban reserve area will be served by infrastructure investments made in the Damascus area at a future time in the reserve planning period, pages 1207-1212.

Orderly and economic provision of public facilities and services

Joint state agency letter with department-specific comments on the candidate areas, dated April 6, 2009: ODOT initial assessment showing Highway 212 with low potential to accommodate additional traffic and high relative cost to improve conditions, and Highway 26 with medium potential to accommodate additional traffic and medium relative cost to improve conditions, including additional need for the I-84 to US 26 connector, pages 1230-1240.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, pages 1168-1180.

Attachment 2

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, pages 1181-1187.

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 11-14

Comparative environmental, energy, economic and social consequences

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 11-14

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 11-14

DAMASCUS SOUTH (2A)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

Making the Greatest Place – Strategies for a sustainable and prosperous region – A report from Metro’s Chief Operating Officer – Overview, Recommendation, Sections 3A, 3B, 3D and 3E, September 15 , 2009, Metro Capacity Ordinance record, Ordinance 10-1244B & 11-11252A, page 2678

Clackamas County Urban and Rural Reserves Record – Report Disk 1/3-BCC-Indexed/6 Sept 10 Business Mtg/12-BCCRecommendationpacketforRSC092309, page 11

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 9-11

Orderly and economic provision of public facilities and services

Joint state agency letter with department-specific comments on the candidate areas, dated April 6, 2009: ODOT initial assessment showing Highway 212 with low potential to accommodate additional traffic and high relative cost to improve conditions, pages 1230-1240

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, pages 1163-1167

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, pages 1168-1180

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, pages 1181-1187

Clackamas County Urban and Rural Reserves Record – Report Disk 1/3-BCC-Indexed/6 Sept 10 Business Mtg/12-BCCRecommendationpacketforRSC092309, page 11

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Comparative environmental, energy, economic and social consequences

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Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 9-11

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

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HOLCOMB (3B)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

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Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 14-16

Metro Capacity Ordinance Master Record List for Metro Ordinance 10-1244B & 11-1252A, Email: Oregon City Comments for Public Record: 2010 Growth Management Assessment and Recommendations, with attached letter to Michael Jordan FROM: Tony Konkol, City of Oregon City documenting existing capacity within Oregon City and inability to accommodate additional residential land needs at this time (attached)

Orderly and economic provision of public facilities and services

Joint state agency letter with department-specific comments on the candidate areas, dated April 6, 2009: ODOT initial assessment showing Highway 213 with low potential to accommodate additional traffic and high relative cost to improve conditions, and I-205 with low potential to accommodate additional traffic and high relative cost to improve conditions, including improvements to the Highway 213 interchange, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1230-1240.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1168-1180.

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Comparative environmental, energy, economic and social consequences

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 14-16

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

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HOLLY LANE/NEWELL CREEK CANYON (3C)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

Making the Greatest Place – Strategies for a sustainable and prosperous region – A report from Metro’s Chief Operating Officer – Overview, Recommendation, Sections 3A, 3B, 3D and 3E, September 15 , 2009, Metro Capacity Ordinance Record, Metro Ordinance 10-1244B & 11-1252A, page 2680

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Orderly and economic provision of public facilities and services

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Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1163-1167

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1168-1180

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1181-1187

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 14-16

Comparative environmental, energy, economic and social consequences

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 14-16

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 14-16

HENRICI (3F)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

Making the Greatest Place – Strategies for a sustainable and prosperous region – A report from Metro’s Chief Operating Officer – Overview, Recommendation, Sections 3A, 3B, 3D and 3E, September 15, 2009, Metro Capacity Ordinance Record, Metro Ordinance 10-1244B & 11-1252A, page 2681

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Orderly and economic provision of public facilities and services

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Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 14-16

Making the Greatest Place – Strategies for a sustainable and prosperous region – A report from Metro’s Chief Operating Officer – Overview, Recommendation, Sections 3A, 3B, 3D and 3E, September 15 , 2009, Metro Capacity Ordinance Record, Metro Ordinance 10-1244B & 11-1252A, page 2681

STAFFORD (4A)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

Letter from Doug Rux, Community Development Director, City of Tualatin to MPAC, dated December 1, 2009, joint statement from Tualatin and West Linn regarding the urbanization of the Stafford Area north of I-205 and the northern portion of the Pete's Mountain along the Tualatin River, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1504-1507

Letter from Lake Oswego Mayor Jack Hoffman regarding city's unwillingness to serve the Stafford Basin, Clackamas County Urban and Rural Reserves Record – Report Disk 2/6-ZDO 223 indexed/2-BCC hearing April 21 2010/1-UR Reserves BCC file County Findings with Citations, pages 121-122

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U4-1 – U4-9

Orderly and economic provision of public facilities and services

Letter from Doug Rux, Community Development Director, City of Tualatin to MPAC, dated December 1, 2009, joint statement from Tualatin and West Linn regarding the urbanization of the Stafford Area north of I-205 and the northern portion of the Pete's Mountain along the Tualatin River, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1504-1507

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Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1163-1167

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1168-1180

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B pages 1181-1187

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 17-20

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Comparative environmental, energy, economic and social consequences

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 17-20

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Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 17-20

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ROSEMONT (4B)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

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Letter from Lake Oswego Mayor Jack Hoffman regarding city's unwillingness to serve the Stafford Basin, Clackamas County Urban and Rural Reserves Record – Report Disk 2/6-ZDO 223 indexed/2-BCC hearing April 21 2010/1-UR Reserves BCC file County Findings with Citations, pages 121-122

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U4-1 – U4-9

Orderly and economic provision of public facilities and services

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Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1163-1167

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1168-1180

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Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 17-20

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Comparative environmental, energy, economic and social consequences

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 17-20

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U4-1 – U4-9

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 17-20

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U4-1 – U4-9

BORLAND (4C)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

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Letter from Lake Oswego Mayor Jack Hoffman regarding city's unwillingness to serve the Stafford Basin, Clackamas County Urban and Rural Reserves Record – Report Disk 2/6-ZDO 223 indexed/2-BCC hearing April 21 2010/1-UR Reserves BCC file County Findings with Citations, pages 121-122

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Orderly and economic provision of public facilities and services

Letter from Doug Rux, Community Development Director, City of Tualatin to MPAC, dated December 1, 2009, joint statement from Tualatin and West Linn regarding the urbanization of the Stafford Area north of I-205 and the northern portion of the Pete's Mountain along the Tualatin River, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1504-1507

Letter from Lake Oswego Mayor Jack Hoffman regarding city's unwillingness to serve the Stafford Basin, Clackamas County Urban and Rural Reserves Record – Report Disk 2/6-ZDO 223 indexed/2-BCC hearing April 21 2010/1-UR Reserves BCC file County Findings with Citations, pages 121-122

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Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1163-1167

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1168-1180

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B pages 1181-1187

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 17-20

Clackamas County Urban and Rural Reserves Record – Report Disk 1/3-BCC-Indexed/6 Sept 10 Business Mtg/12-BCCRecommendationpacketforRSC092309, page 8

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U4-1 – U4-9

Comparative environmental, energy, economic and social consequences

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 17-20

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U4-1 – U4-9

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 17-20

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U4-1 – U4-9

NORWOOD (4D)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 20-23

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U3-1 – U3-9

Orderly and economic provision of public facilities and services

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Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1163-1167

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Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B pages 1181-1187

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 20-23

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U3-1 – U3-9

Comparative environmental, energy, economic and social consequences

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Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

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Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U3-1 – U3-9

SHERWOOD NORTH (5A)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

Orderly and economic provision of public facilities and services

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1168-1180.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

Comparative environmental, energy, economic and social consequences

City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

SHERWOOD WEST - PARTIAL (5B)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

Orderly and economic provision of public facilities and services

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

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Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

Comparative environmental, energy, economic and social consequences

City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

TONQUIN - PARTIAL (5F)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

Orderly and economic provision of public facilities and services

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1163-1167

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City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

Comparative environmental, energy, economic and social consequences

City of Sherwood Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3474-3482

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

WILSONVILLE SOUTHWEST (5H)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 20-23

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk 1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U1-1 – U1-8

Clackamas County Urban and Rural Reserves Record – Report Disk 1/3-BCC-Indexed/6 Sept 10 Business Mtg/12-BCCRecommendationpacketforRSC092309, page 2

Orderly and economic provision of public facilities and services

Joint state agency letter with department-specific comments on the candidate areas, dated April 6, 2009: ODOT initial assessment showing that one of the highways least suitable to accommodate additional trips and most expensive to improve is I-5, especially the segment from Hwy 217 to south of the Willamette River with a huge relative cost to improve conditions due to identified severe capacity problems within and south of existing UGB and at Wilsonville interchanges, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1230-1240

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1163-1167

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Clackamas County Urban and Rural Reserves Record – Report Disk 1/3-BCC-Indexed/6 Sept 10 Business Mtg/12-BCCRecommendationpacketforRSC092309, page 2

Comparative environmental, energy, economic and social consequences

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 20-23

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U1-1 – U1-8

Clackamas County Urban and Rural Reserves Record – Report Disk 1/3-BCC-Indexed/6 Sept 10 Business Mtg/12-BCCRecommendationpacketforRSC092309, page 2

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Clackamas County Urban and Rural Reserves Record – Report Disk 2/i-Adoption/Final County Findings with Citations, pages 20-23

Draft Urban Reserve Factors Review, June 24, 2009, Clackamas County Urban and Rural Reserves Record – Report Disk1/2-TAC-indexed/10-June 25 09/2-Areas 1-4 For TAC, pages U1-1 – U1-8

Clackamas County Urban and Rural Reserves Record – Report Disk 1/3-BCC-Indexed/6 Sept 10 Business Mtg/12-BCCRecommendationpacketforRSC092309, page 2

SOUTH HILLSBORO - PARTIAL (6A)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Hillsboro Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3110-3452

Orderly and economic provision of public facilities and services

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1168-1180.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of Hillsboro Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3110-3452

Comparative environmental, energy, economic and social consequences

City of Hillsboro Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3110-3452

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

City of Hillsboro Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3110-3452

COOPER MOUNTAIN SOUTHWEST - PARTIAL (6B)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Beaverton letter with South Cooper Mountain Prospectus attachment, Metro Urban Growth Boundary Record, Ordinance 11-1264B, pages 368-400

Email with map and brochure regarding South Cooper Mountain Urban Reserves candidate area, describing the area's potential as a Great Community within Metro Urban Reserves, dated August 24, 2009, Ordinance 10-1238A, pages 1318-1321.

City of Beaverton Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3054-3061

Orderly and economic provision of public facilities and services

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1168-1180.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of Beaverton Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3054-3061

City of Beaverton letter with South Cooper Mountain Prospectus attachment, Metro Urban Growth Boundary Record, Ordinance 11-1264B, pages 368-400

Comparative environmental, energy, economic and social consequences

City of Beaverton Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3054-3061

City of Beaverton letter with South Cooper Mountain Prospectus attachment, Metro Urban Growth Boundary Record, Ordinance 11-1264B, pages 368-400

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

City of Beaverton Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3054-3061

City of Beaverton letter with South Cooper Mountain Prospectus attachment, Metro Urban Growth Boundary Record, Ordinance 11-1264B, pages 368-400

ROY ROGERS WEST - PARTIAL (6C)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Tigard Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3483-3494

Community Investment Strategy - Building a sustainable, prosperous and equitable region - Recommendations from Metro's Chief Operating Officer –Preliminary analysis of potential urban growth boundary expansion areas - July 5 2011, Metro Urban Growth Boundary Record Ordinance 11-1264B, pages 617-634

Orderly and economic provision of public facilities and services

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1168-1180.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of Tigard Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3483-3494

Community Investment Strategy - Building a sustainable, prosperous and equitable region - Recommendations from Metro's Chief Operating Officer –Preliminary analysis of potential urban growth boundary expansion areas - July 5 2011, Metro Urban Growth Boundary Record Ordinance 11-1264B, pages 617-634

Comparative environmental, energy, economic and social consequences

City of Tigard Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3483-3494

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

City of Tigard Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3483-3494

BEEF BEND SOUTH (6D)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of King City presentation to Washington County Planning Directors meeting, Washington County Urban and Rural Reserves Record, pages 1056-1059

City of King City Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3453-3465

Orderly and economic provision of public facilities and services

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1168-1180.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of King City Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3453-3465

Comparative environmental, energy, economic and social consequences

City of King City presentation to Washington County Planning Directors meeting, Washington County Urban and Rural Reserves Record, pages 1056-1059

City of King City Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3453-3465

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

City of King City presentation to Washington County Planning Directors meeting, Washington County Urban and Rural Reserves Record, pages 1056-1059

City of King City Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3453-3465

DAVID HILL (7A)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Forest Grove Pre-qualifying Concept Plan, indicating recent economic opportunity analysis determined that estimated capacity of the city within the UGB should be sufficient to meet housing needs during the next twenty years, Washington County Urban and Rural Reserves Record, page 3087

Orderly and economic provision of public facilities and services

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1163-1167

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, pages 1168-1180

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B pages 1181-1187

Testimony from Pete Truax, Mayor of Forest Grove dated January 21, 2010, regarding services available to David Hill area, Metro Urban and Rural Reserves Record, Metro Ordinance 10-1264B, page 1635

Comparative environmental, energy, economic and social consequences

Washington County Urban and Rural Reserves Record, A Engrossed Ordinance No. 733, Findings of Fact, page 9179

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Washington County Urban and Rural Reserves Record, A Engrossed Ordinance No. 733, Findings of Fact, page 9179

FOREST GROVE NORTH - PARTIAL (7B)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Forest Grove Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3084-3109

Community Investment Strategy - Building a sustainable, prosperous and equitable region - Recommendations from Metro's Chief Operating Officer –Preliminary analysis of potential urban growth boundary expansion areas - July 5 2011, Metro UGB record Ordinance 11-1264B, pages 635-652

Orderly and economic provision of public facilities and services

Joint state agency letter with department-specific comments on the candidate areas, dated April 6, 2009: ODOT initial assessment showing Highway 47 with high potential to accommodate additional traffic and medium relative cost to improve conditions, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1230-1240.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1168-1180.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of Forest Grove Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3084-3109

Community Investment Strategy - Building a sustainable, prosperous and equitable region - Recommendations from Metro's Chief Operating Officer –Preliminary analysis of potential urban growth boundary expansion areas - July 5 2011, Metro UGB record Ordinance 11-1264B, pages 635-652

Comparative environmental, energy, economic and social consequences

City of Forest Grove Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3084-3109

Community Investment Strategy - Building a sustainable, prosperous and equitable region - Recommendations from Metro's Chief Operating Officer –Preliminary analysis of potential urban growth boundary expansion areas - July 5 2011, Metro UGB record Ordinance 11-1264B, pages 635-652

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

City of Forest Grove Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3084-3109

Community Investment Strategy - Building a sustainable, prosperous and equitable region - Recommendations from Metro's Chief Operating Officer –Preliminary analysis of potential urban growth boundary expansion areas - July 5 2011, Metro UGB record Ordinance 11-1264B, pages 635-652

CORNELIUS EAST - PARTIAL (7C)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Cornelius Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3066-3083

Orderly and economic provision of public facilities and services

Joint state agency letter with department-specific comments on the candidate areas, dated April 6, 2009: ODOT initial assessment showing Highway 8 with medium potential to accommodate additional traffic due to railroad constraints and difficulty to widen and add railroad crossings and low relative cost to improve conditions for this small highway segment, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1230-1240.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1168-1180.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of Cornelius Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3066-3083

Community Investment Strategy - Building a sustainable, prosperous and equitable region - Recommendations from Metro's Chief Operating Officer –Preliminary analysis of potential urban growth boundary expansion areas - July 5 2011, Metro UGB record Ordinance 11-1264B, pages 653-661

Comparative environmental, energy, economic and social consequences

City of Cornelius Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3066-3083

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

City of Cornelius Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3066-3083

HILLSBORO NORTH - PARTIAL (8A)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Hillsboro Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3110-3452

Attachment 11 to Staff Report for Ordinance 11-1264B Metro Urban Growth Boundary

Orderly and economic provision of public facilities and services

Joint state agency letter with department-specific comments on the candidate areas, dated April 6, 2009: ODOT initial assessment showing Highway 26, Cornelius Pass to Shute Road/Helvetia Road interchange, with medium potential to accommodate additional traffic and medium relative cost to improve conditions. Also Glencoe Road interchange needing a new overpass structure and additional improvements to Jackson School Road interchange, Metro Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1230-1240.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1168-1180.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee, dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of Hillsboro Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3110-3452

North Hillsboro Industrial Area Infrastructure Analysis, Attachment 10 to Staff Report for Ordinance 11-1264B, Metro Urban Growth Boundary

City of Hillsboro Document, Attachment 11 to Staff Report for Ordinance 11-1264B, Metro Urban Growth Boundary

Comparative environmental, energy, economic and social consequences

City of Hillsboro Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3110-3452

City of Hillsboro Document, Attachment 11 to Staff Report for Ordinance 11-1264B

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

City of Hillsboro Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3110-3452

City of Hillsboro Document, Attachment 11 to Staff Report for Ordinance 11-1264B, Metro Urban Growth Boundary

BETHANY WEST (8C)

GOAL 14 LOCATIONAL FACTORS

Efficient accommodation of identified land needs

City of Beaverton Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3054-3061

Orderly and economic provision of public facilities and services

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee dated February 9, 2009: Preliminary Analysis of Providing Urban Level Water Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1163-1167.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee dated February 9, 2009: Preliminary Analysis of Providing Urban Level Sanitary Sewer Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1168-1180.

Memorandum from Core 4 Technical Team to Core 4 and Reserves Steering Committee dated February 11, 2009: Preliminary Analysis of Providing Urban Level Transportation Service within Reserves Study Area, Urban and Rural Reserves Record, Ordinance 10-1238A, pages 1181-1187.

City of Beaverton Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3054-3061

Clean Water Services Memorandum dated May 25, 2010, Washington County Urban and Rural Reserves Record, pages 9271-9274

Comparative environmental, energy, economic and social consequences

City of Beaverton Pre-qualifying Concept Plan, Washington County Urban and Rural Reserves Record, pages 3054-3061

Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

