

COALITION FOR A LIVABLE FUTURE

107 SE WASHINGTON STREET, SUITE 239 • PORTLAND, OR 97214
PHONE: 503.294.2889 • FAX: 503.225.0333 • WWW.CLFUTURE.ORG



October 15, 2009

Metro Council
600 NE Grand Avenue
Portland, OR 97232

DEPT OF
JUL 14 2010
LAND CONSERVATION
AND DEVELOPMENT

Dear President Bragdon and Metro Council:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Coalition for a Livable Future's *Equity Atlas* substantiates that people have been priced out of Portland's urban core and settled into the outer areas of the region. Yet, transportation costs in these areas are higher now and projected to rise in the future. Without adequate planning for affordable housing, linked to transportation, these communities could languish in increasing isolation, with growing housing and transportation cost burdens.

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

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

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

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

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

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

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

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

Metro has struggled to ensure that its local jurisdiction partners demonstrate how the projects and plans they propose help actualize Region 2040. Possible mechanisms include performance measurement tracked through an annual audit, or use of criteria to evaluate projects, like those used in the Nature in

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

the Neighborhoods Capital Grants Program and the Metropolitan Transportation Improvement Program. Furthermore, Metro should facilitate an agreement between jurisdiction partners to encourage adaptive management.

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

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

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

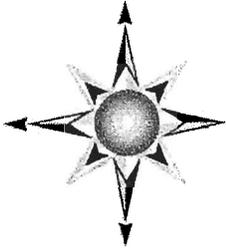
The Coalition for a Livable Future wishes to be a full partner with Metro, local jurisdictions, and metro area residents to ensure the upcoming decisions result in a healthy, prosperous region now and in the future. We urge you to take the next big step forward toward realizing 2040 and strengthening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

Sincerely,

Handwritten signatures of Ron Carley and Jill Fuglister. The signature on the left is Ron Carley's, and the signature on the right is Jill Fuglister's.

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

Cc: Reserves Steering Committee
JPACT
MPAC
greatestplace@oregonmetro.gov



COALITION FOR A LIVABLE FUTURE

107 SE WASHINGTON STREET, SUITE 239 • PORTLAND, OR 97214
PHONE: 503.294.2889 • FAX 503.225.0333 • WWW.CLFUTURE.ORG

January 12, 2009

RE: Equity Considerations in Making the Greatest Place Planning Processes

Dear Metro Council and Reserves Steering Committee:

As you know, CLF has been working to elevate the issue of equity in the context of our region's discussions of sustainable development for the past decade. By equity, we mean ensuring that our planning decisions result in increased access to opportunities by communities of color and low-income communities, historically disadvantaged populations with the greatest needs.

We appreciate Metro's intent to address equity considerations as part of the Making the Greatest Place planning processes as expressed when the Regional Reserves Committee was first created. We believe that there are opportunities to advance regional equity in the context of the designation of regional urban and rural reserves and in the Greatest Place decisions, and we urge you to now take action on the intention to address equity considerations and to work with us toward that end.

Some of the big-picture questions that arise around equity include how to avoid the future displacement of low-income and culturally diverse populations as land values continue to increase, and how to prevent the negative impacts when displacement occurs. These issues have arisen both for low-income populations in central city communities and for those living in manufactured homes. Other questions include how to ensure that everyone in the region has access to affordable housing and transportation, essential services, healthy neighborhoods and natural areas.

Public investments in existing lower income communities inside the Urban Growth Boundary may improve those communities while accommodating growth in ways that cost less than it would cost to provide infrastructure and services to UGB expansion areas. Evaluating the past and potential future impacts, and engaging affected communities, are necessary in order to make an informed decision on UGB expansions and other Greatest Place decisions.

EVALUATION

To begin understanding equity considerations associated with upcoming Greatest Place decisions, we request that Metro evaluate recent UGB

expansion decisions, development patterns, and demographic changes to determine the impact of those past decisions on low-income and culturally diverse populations. This will provide critical background information to inform the reserves discussion.

We ask Metro to evaluate several questions regarding the relationship between UGB expansion and affordable housing:

- (1) What has been the sale price of new housing built in UGB expansion areas (compared to average home price at the time)?
- (2) How much of that new housing has been multi-family rental housing?
- (3) What is the average income of people living in each of the UGB expansion areas, and how does it compare to average incomes in areas within the UGB?
- (4) What are the combined housing and transportation costs for lower income households living in past UGB expansion areas?
- (5) Is there evidence of indirect benefits or burdens of new housing in UGB expansion areas on housing opportunities for lower income people in the communities near or far from the UGB expansion areas?

SCENARIOS

We also ask that Metro evaluate development scenarios and investment strategies of the Region 2040 and Making the Greatest Place planning components to determine where benefits will be realized and whether the planning process will lead to an inequitable burden on those with the fewest resources.

In particular, we ask Metro to evaluate:

- (1) The impact of paying for planning and infrastructure in UGB expansion areas on low and lower income communities within the same taxing authority. For example, if the UGB is expanded in Washington County, and that infrastructure is paid for with Washington County funds, what is the impact on the availability of funds to pay for public investments or services in Aloha and Beaverton?
- (2) The anticipated income level mix in Greatest Place model communities. Various descriptions of the model communities that could be built in UGB expansion areas have been provided, and we would like to see Metro help ensure that a range of income levels are served in model communities.

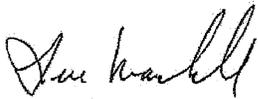
PROCESS

Metro and regional jurisdictions are relying on the periodic review of local comprehensive plans as a means of public involvement in determining local aspirations, growth, and development planning. Land use planning processes do not inherently engage low-income and diverse segments of our community, yet these populations are directly impacted by local and regional planning. In addition, they may be paying a disproportionate share of the costs of development or may be economically disadvantaged by these decisions.

We are concerned that those with the fewest resources in the region, who may be adversely impacted by regional planning decisions, are not being provided an opportunity to participate and voice their opinions. We request that Metro augment local public participation efforts with outreach efforts that are designed to specifically reach these populations. The City of Portland's grant making to local community organizations to carry out similar outreach is a model to consider. This not only achieves outreach goals, but also builds community capacity, achieving multiple goals at once.

We appreciate your consideration of these comments and look forward to working with you to advance equity in the Regional Reserves process and other Making the Greatest Place efforts.

Sincerely,

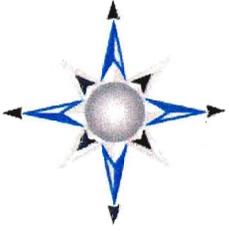


Sue Marshall
CLF Regional Reserves Representative



Ron Carley & Jill Fuglister
CLF Co-Directors

Cc: Clackamas County Urban & Rural Reserves Policy Advisory Committee
Multnomah County Citizens Advisory Committee for Urban and Rural Reserves
Washington County Reserves Coordinating Committee
JPACT
MPAC
Metro Committee for Citizen Involvement
Washington County Coordinating Committee
Clackamas County Coordinating Committee



COALITION FOR A LIVABLE FUTURE

107 SE WASHINGTON STREET, SUITE 239 • PORTLAND, OR 97214
PHONE: 503.294.2889 • FAX: 503.225.0333 • WWW.CLFUTURE.ORG

July 14, 2010

Urban and Rural Reserves Specialist
Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Sent via mail and email

Re: Objections to Metro Ordinance No. 10-1238A
Adopting Urban and Rural Reserves

Dear Department of Land Conservation and Development:

Coalition for a Livable Future writes to formally object to the regional urban reserves proposal for 28,165 acres of urban reserves, and in particular to the reserves proposal for Washington County, which we believe fails to meet the legal requirements for the Urban and Rural Reserves statute and administrative rule.

Coalition for a Livable Future is a partnership of over 100 diverse organizations and hundreds of individuals to promote healthy and sustainable communities. For nearly 15 years Coalition for a Livable Future has worked to protect, restore, and maintain healthy, equitable, and sustainable communities, both human and natural, for the benefit of present and future residents of the greater Portland-Vancouver metro area. During this time we have consistently participated in Metro's long range planning processes, including on the Reserves Steering Committee through our representative, Sue Marshall. We submitted written comments on Urban and Rural Reserves to Metro Council on January 12, 2009 and October 15, 2009. Both of these comment letters are attached.

Objection: The large reserves proposed by Washington County have negative impacts on low-income communities and communities of color, on the region's ability to create and support vibrant communities, on agriculture and natural landscapes, and on the climate.

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

this expense is fewer dollars for development in existing communities and/or higher costs for everyone to meet our infrastructure needs.

The negative effects of these changes impact all communities as it means less money available to maintain and enhance our existing common resources. It means fewer funds to create the vibrant regional and town centers and compact neighborhoods in already developed areas. Developing these areas has multiple benefits: it reduces wasteful spending on public infrastructure; promotes health and equity; helps reduce global warming; and protects farmland, parks, and natural resources.

The funding spent on new infrastructure at the edge of the region means less investment in the communities that need it most, disproportionately affecting low income communities and communities of color. These communities frequently live in areas in need of public investment in parks, affordable housing, sidewalks, and other amenities, particularly as these groups have been forced out of the central city and into outer ring suburbs due to high housing costs.

The cost of serving newly urbanized areas also means that homes are rarely if ever affordable. Metro's Urban Growth Report documents that the price of new homes in UGB growth areas has averaged \$100,000 more than inside the preexisting UGB, and transportation costs, which are the second largest household cost for most families, is also significantly higher near the edge of the region.

Urbanization of these large tracts would also harm floodplains and other natural landscapes, and would eviscerate significant agricultural use in the western part of the region. Washington County is in the top 5 agriculture-producing counties in the state, leading to economic harm as well as loss of food security from urbanization.

Furthermore, the vehicle traffic these areas would generate once urbanized is contrary to the Oregon's goal to reduce greenhouse gas pollution by 75% by 2050. Transportation is responsible for over one-third of the greenhouse gas emissions that cause global warming. As discussed by [Oregon's Metropolitan Planning Organization Greenhouse Gas Task Force](#), we can reduce the need for travel and significantly reduce GHG emissions from automobiles by planning our metropolitan areas in ways that build in transportation options and decrease people's need to drive to meet their daily needs.

The low density development typical of UGB expansion areas, frequently far from job centers, will lead people needing to drive long distances for their daily needs, leading to increased greenhouse gas emissions, as well as greater costs to families, increased stress and less time together, poorer air quality, less exercise, poorer health, and a greater strain on our roads.

Remedy: Significant Urban Reserves are unnecessary, and we should instead focus on developing land within the current UGB.

Metro's Urban Growth Report indicates that under *current zoning* we have enough land to fulfill our needs for the next 50 years if we utilize existing buildable land inside the current UGB more effectively. We can and should invest current and future resources within the UGB. As we do so, we must: (1) protect streams, wetlands, and upland forests and provide ample parks, trails and natural areas; and (2) make permanent affordable housing and equitable, affordable transportation choices key drivers so that low-income and people of color populations housing are not displaced.

Sincerely,



Ron Carley
Co-Director
ron@clfuture.org



Jill Fuglister
Co-Director
jill@clfuture.org

Cc: Laura Dawson Bodner, Metro Regional Government
Maggie Dickerson, Clackamas County
Chuck Beasley, Multnomah County
Steve Kelley, Washington County

Attachments: Letter to Metro Council and Reserves Steering Committee, January 12, 2009, regarding Equity Considerations in Making the Greatest Place Planning Processes

Letter to Metro Council, copied to Reserves Steering Committee and others, October 15, 2009, regarding Metro's Making the Greatest Place