

January 7, 2025

Periodic Review Specialist
Department Of Land Conservation and Development
635 Capitol St. Northeast, Suite 150
Salem, Oregon 973 01

RE: Metro Urban Growth Boundary Amendment Ordinance 24-1520

I am submitting this letter under my own name. I come to this issue with 36 years of local government experience in land use planning and more in the non-profit sector. The following are my own objections to Metro's Ordinance No. 2415-20 amending the Metro Regional Urban Growth Boundary (UGB). I participated orally and in writing at the September 26, 2024, Metro hearing on this matter and in writing on October 15, 2024, and October 28, 2024.

In general, the attached objections and related findings contend Metro's Council's decision to adopt Ordinance No. 2415-20 do not adequately address key elements of its Urban Growth Management Functional Plan, its Public Engagement Guidelines, Metro Regional Transportation Plan and portions of the Regional Framework Plan. This document provides detailed findings and conclusions based on the Sherwood Concept Plan findings as justification for Metro approval. Therefore, it is requested these objections be included in the record.

The above refer significantly to the fact that providing infrastructure to Sherwood's UGB proposal will cost a great deal and net a relatively small amount of developable land. The result will result in high development costs that will make it infeasible to develop moderate and affordable housing. I urge you to read the attached short report (Attachment 3) which explains this in detail.

The remedies being requested are identified in the objections document. In summary these are for DLCD to remand Metro's Decision (Ord. 24-1520) for it to propose more creative land use alternatives to promote a more compact urban form that will better address Metro Functional Plan requirements, the intent of the Regional Framework Plan and the Statewide Planning Goals.

Please also find attached supporting documentation also prepared and submitted by me.

Sincerely,

Ron Bunch

Attachments:

1. Findings in Rebuttal Findings in Rebuttal of the Sherwood Urban Growth Boundary Expansion (UGB) Proposal
2. Memo to Metro Council and Metro Core Committee October 15, 2025, regarding Equity and the Sherwood West UGB Expansion
3. Sherwood West Urban Growth Boundary Expansion Land use, Infrastructure, Funding and Other Costs

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Attachment 1:
Objections to Metro's Approval of the
Sherwood Urban Growth Boundary Expansion (UGB) Proposal

The following address claims and justifications contained in the Sherwood Urban Growth Boundary Concept Plan as the basis for expanding the Metro UGB.

OBJECTION A: METRO'S UGB PROCES AND DECISION WAS BASED ON MANAGED INPUT FROM SELECT GROUPS WHOSE INTEREST ALIGN TO GAIN BENEFIT FROM THE UGB DECISION, IN VIOLATION OF STATEWIDE PLANING GOAL 1 AND MEETRO'S PUBLIC ENGAGEMENT GUIDELINES.

Discussion:

Metro claims there was extensive input from community members, property owners, business owners, and public service providers.

There are important questions to be asked about this claim, particularly, how broad was the engagement process, who were involved, and what was their motivation. For example, the engagement record makes no mention of an on-line survey that done in 2021, that showed a majority of those surveyed (more than 80%) were opposed to a similar urban growth boundary expansion?

Finding IA: Many of those that support the UGB expansion would benefit financially or have other vested interests in the expansion. The endorsement of the UGB expansion came from these groups or their allies including those in the real estate, construction development sectors, consultants and economic development organizations. Other support came from local governments and agencies whose primary focus is to support their agency colleagues. Special districts are supportive of these actions because their narrow mission is to provide services, which in turn expands their tax base and service area. None of these expressions of support factually acknowledge negative consequences, or lost opportunities of this specific UGB expansion from a growth management perspective. There was either no, very little input from the larger Sherwood community such as neighborhood and civic organizations or those who advocate for affordable housing, natural resource protections, transportation, economic social and racial equity. For example, the above claim is contrary to statement from the Metro CORE Committee that the concept plan process failed to provide or address equitable, inclusive engagement or results.

The Guidelines for Goal 1 include this statement: “A. PREPARATION OF PLANS AND IMPLEMENTATION MEASURES Preparation of plans and implementation measures should be based on a series of broad phases, proceeding from the very general identification of problems and issues to the specific provisions for dealing with these issues and for interrelating the various elements of the plan. During each phase opportunities should be provided for review and comment by citizens and affected governmental units.”

Metro published its hundreds of pages of analysis of alternative UGB expansion areas after critical public hearings and after the Metro Council had already made a preliminary decision to approve the Sherwood UGB expansion.

Conclusion: There has been managed input from select groups whose interests align to gain benefit from the UGB decision. The input has focused on the benefits that would accrue to the specific interest of these groups and not the region or the whole community. Therefore the, the premise that extensive input can justify the UGB expansion is false.

Metro Council’s approval of the Sherwood West UGB expansion (Ordinance 24-1520) is not consistent with the intent of Statewide Planning Goal 1 as implemented in the by the Metro Public Engagement Guide – Appendices A and C, as it pertains to Statewide Planning Goal 1.

Recommended remedy: LCDC should conclude that Metro’s public engagement process was so deeply flawed that it contributes to fundamentally flawed decision making and remand the decision to Metro to reconsider the merits of its decision after allowing for proper citizen involvement.

OBJECTION B: THE SHERWOOD UGB EXPANSION WILL REQUIRE VERY LARGE INFRASTRUCTURE COSTS, AND THE AREA’S GEOGRAPHY WILL RESULT IN A HIGH-COST, LOW-DENSITY AUTOMOBILE ORIENTED LAND USE PATTERN, UTTERLY INCONSISTENT WITH STATE AND REGIONAL LAWS AND POLICIES CALLING FOR COMPACT, COST-EFFECTIVE, URBAN DEVELOPMENT WHICH SUPPORT LESS DRIVING AND HIGHER TRANSIT USE.

Discussion:

Metro and Sherwood claim that Sherwood West would be a “complete” community with a range of housing, employment types, access to retail shopping, connected buy a system of parks, trails and open space.

The claim does not match the likely outcome of the UGB expansion as proposed. It ignores that very large infrastructure costs, which I examined and critiqued in detail for Metro's consideration, and the area's geography will result in a high cost, low-density automobile-dependent land use pattern.

The cost to develop a relatively small amount of developable land that could be derived from the 1,290-acre UGB expansion makes it infeasible to build moderate income, affordable and low-income housing types or justify the development of new commercial land uses. This means that Metro failed in its statutory responsibilities to address the needs of the region's residents who will never be able to afford the expensive homes and apartments that have been and will be built in Sherwood West.

Finding 1B: The West Sherwood UGB expansion will be partially separated from the rest of the city by a major state highway (Highway 99 West) and bisected by major county arterial and collector streets. The new street system will allow external traffic from all points to access to use these streets as major east-west connectors. This will contribute to the making the project area car dominated and auto dependent.

A major factor why the area cannot become a "complete community is that it will net a relatively small amount of developable land out of the proposed 1290-acre expansion. The concept plan recognizes only about 605 acres of the total are developable. However, its estimated that this will be reduced to about 430 acres after removing land needed for streets, easements, parks, future schools and possibly public safety facilities.

This is significant, because the estimated cost of foundational and development infrastructure could be more than \$500 million (present value). This relatively small amount of developable land combined with these costs will lower the feasibility of developing affordable, moderate- and low-income housing. The development costs will be very high. Also, this will restrict land acquisition and development for parks and trails, further undermining the claim the Sherwood West UGB expansion will result in a "complete community"

The size, linear shape, topography and "through traffic potential" of the area will not be supportive of transit, pedestrian and bike travel per the proposed concept plan. Instead, shopping, entertainment, recreation, job and school access, will all be dependent on automobile travel. These same factors, combined with an overall low residential density would discourage development of a mixed use "sub-centers" or mixed-use

commercial/residential corridors. Much of the area will be a considerable distance from Sherwood's retail and commercial services and those of other communities thus requiring automobile travel.

Finding 2B: Much of West Sherwood will be an auto dependent and road dominated suburban style development . The existing and proposed street system, geography and topography will present significant barriers to non-automobile travel and to overall connectivity of land uses. The geographic characteristics of the area such as the steep topography , flood plains and linear form does not support the claim of a complete community.

Housing and infrastructure construction costs are greater on steeper land. Within suburban contexts, density on topographically constrained land must be relatively low and utilities and streets are more expensive to build. These costs require very low density and very expensive single-family homes.

Finding 3B: Those living in residential areas require services such as grocery stores, hardware, pharmacies, apparel, etc. on a regular basis. Retail and some commercial services exist already, east and west of Hwy 99W and will be accessible to the proposed expansion area but will require automobile travel. The claim that the area will be a complete community from the perspective that a complete range of goods and services will be easily accessible to residents cannot be proven.

Some small-scale neighborhood commercial retail development may occur, but it is more likely that existing commercial uses in Sherwood and nearby communities will accommodate retail demand from Sherwood West should it develop as circumstances dictate.

Competition from nearby established major retail centers in both Sherwood and nearby communities will be major barriers to development of retail commercial land uses in the UGB area. Local retail shopping opportunities both regional and sub-regional will accommodate much of the market for both durable and non-durable goods that will be generated by residential development in Sherwood West. The consequence is that significant traffic will be generated from West Sherwood to and from retail shopping and services in nearby communities. From this perspective inter-city travel within the sub-region will likely be increased. This further undermines Sherwood's "complete community" narrative.

Another impediment to new commercial/retail uses being established in the expansion area is that ODOT will likely discourage retail land uses that will add more trips to Highway 99W or require significant exactions to pay for the same . This would be in addition to already high development costs and city, county and service districts SDCs and road taxes.

Conclusion: For the above reasons the proponents of the Sherwood West expansion have not proven it will be a “complete community. “ The reasons for this are:

- A range of housing types will not be developed in Sherwood West, because of the small amount of net developable land compared to the size of UGB expansion. High infrastructure and development costs will preclude building moderate, affordable and low-income housing.
- The size, configuration geography and topography of the area present barriers to non-automobile travel (transit, bike and pedestrian) and connectivity of land uses.
- New commercial uses , beyond some neighborhood commercial, cannot be viable area because of land/infrastructure costs, low residential densities, auto dependence and competition from nearby established and viable commercial uses.
- Land costs will restrict the ability to provide parks and trail connections as envisioned. Because of low land use densities and associated costs, the land use pattern will be auto dependent.

Metro Council’s approval of the Sherwood West UGB expansion (Ordinance 24-1520) is inconsistent with its Regional Transportation System Plan because generally the UGB area will increase auto dependency, force investments in road infrastructure, perpetuate a low density, high-cost suburban development pattern and will result in unforeseen impacts on the Metro 2023 Regional Transportation System Plan (Title 2) , including Highway 99W. It is also counter to the Metro Code Titles 1 Housing Capacity, Title 7, Housing Choice, and Title 11 Planning for New Urban Areas, and Title 12: Protection of Residential Neighborhoods – Access to Parks and Schools.

Recommended remedy: Remand the Metro Council’s decision with direction to the staff and Council to analyze the automobile dependency of the proposed UGB expansion area and consider alternative measures for changes inside the UGB or alternative adjustments of the UGB that will support a less car-centric development pattern.

OBJECTION C. IMPLEMENTATION OF THE SHERWOOD WEST CONCEPT PLAN WILL NOT RESULT IN DEVELOPMENT OF AFFORDABLE AND MIDDLE HOUSING TYPES THUS FAIL TO MEET HOUSING NEED IN SHERWOOD AND ADDRESS AFFORDABLE HOUSING NEED IN THE STATE AND PORTLAND METRO REGION.

Discussion: It is unlikely that Sherwood West will be capable of providing more than a token amount of moderate, affordable or low-income housing for the reasons stated above.

Findings IC: Per the above, high infrastructure costs, and a relatively small amount of net, developable land will reduce the feasibility to build moderate, affordable and low-income housing in many parts of the Sherwood West UGB expansion area. Furthermore, the cost of needed new public facilities is not static. They will increase over time associated with labor and materials costs and local government exactions during the 20 – 30 years during which it's expected the area will be developed.

Infrastructure systems are not developed all at once. Cost estimates today can change dramatically. Experience has shown they could be much greater even a few years from when the original estimates were prepared. This is significant from the perspective of providing affordable housing and developing a complete community. The greater the infrastructure costs, the less affordable housing becomes and development defaults to higher profit margins on expensive large homes.

Water and sanitary rate structures will also need to be increased to keep pace with inflation and pay for needed capital investments and major maintenance in Sherwood West. Utility rates are a housing cost issue. Utility rates should be spread over a variety of a relatively large customer base, to be build affordable. Systems must be designed, built and maintained to be resilient to “rate-shocks” such as when they fail. Otherwise, low- and moderate-income housing residents can be burdened with these costs. This would be significant for Sherwood West and to utility customers system wide.

Conclusion: The Sherwood West Concept Plan does not explicitly show how Sherwood can make a long-term commitment to provide affordable, moderate- or low-income housing. Furthermore, for reasons, Sherwood West will most likely be developed at densities not supportive of public transit which will further reduce the potential to site these housing types. While the cost of infrastructure is acknowledged to be high, there is also uncertainty about the long -term costs of both constructing maintaining, repairing these systems. However, the past has shown Inflation, and other factors will drive costs

higher, thus placing additional cost burden on households. Because of this Metro's approval of the UGB expansion decision is contrary to Functional Plan Titles 1 and 7, Housing Capacity and Housing Choice.

Recommended remedy: Remand the decision to the Metro Council to consider and address the impacts of low residential densities and high infrastructure costs and increased household transportation costs on housing affordability.

OBJECTION D. METRO'S ENDORSED UNJUSTIFIED CONCLUSIONS OF HOUSING NEED, APPROVED LOW DENSITY SINGLE FAMILY RESIDENTIAL DEVELOPMENT IN SHERWOOD WILL DO NOTHING TO INCREASE THE SUPPLY OF HOUSING NEEDED IN THE REGION, AND NEVER CONSIDERED HOW HOUSING NEEDS COULD BE SATISFIED ON LAND ALREADY INSIDE THE UGB.

Discussion: A fundamental question posed by this claim is for whom will new housing in Sherwood West be built? A big part of the supply problem is tied to affordability, and the types of housing that the industry either chooses or must build to be profitable. What the Sherwood West plan asserts is that the UGB expansion will meet overall housing need more than it would. This particular expansion gives all the signs it will be oriented toward building predominantly single-family housing at or above market rates. It will not and cannot provide an appreciable amount of moderate and affordable housing.

It must be noted that West Sherwood Concept Plan referenced the governor's executive order 2023-02, and the finding the Portland metro region experienced a 50.4% increase in homelessness. This is because homelessness results from many-factors and the solutions are multi-faceted. Therefore, questions to address here is, "Will the expansion result in the type of housing at this location that will address local regional issues of homelessness and need for transitional housing. Sherwood West Concept Plan does not present any evidence that it would.

Providing needed housing is more than land supply. The approach to increasing the housing supply includes other factors such as mobility to provide access to stable family wage jobs within a reasonable distance, the ability of a household to have more than one wage earner which requires access to childcare and financial support such as family-tax credits and mortgage subsidization. These factors are more likely to occur in existing communities that have developed the full range infrastructure and private and public institutional support.

Finding D1. In addition to not considering the impact of land and development costs, the West Sherwood plan only considers the housing issue from a land supply side. The expansion plan does not recognize and attempt to address the complexity of the housing supply and housing affordability problem. The metro and statewide housing shortage is caused by combination of factors such as income, interest rates, lack of affordable childcare, the wrong kind housing being developed, the lack of homeless services and transition housing services, etc.

Sherwood's claim about meeting the need region's housing need is only partly correct. Implementation of the Sherwood West Concept Plan as proposed will meet the need of mostly low density single-family and attached housing at high price points and not for those with low and moderate incomes or those. Particularly left out of this discussion is housing for low-income persons and others such as the growing population of the elderly

Finding D2: The UGB expansion proposal did not provide justification about how Sherwood's specific housing needs is forcing a UGB expansion and whether the types of housing proposed in Sherwood West will address its own and regional housing need. It is not at all strategic in terms of matching infrastructure investments, and long-term costs against the benefits of the kind housing that will be built in Sherwood West. Furthermore, it did not consider less expensive options to expanding the UGB to this extent such as infill and redevelopment tailored to more specific housing types that can be served by transit and existing infrastructure.

Finding D3. In projecting housing need and type, the Sherwood Concept Plan emphasized population growth as more of factor than what is actually projected. Population is expected grow in the Metro region. It will increase but not at the level or in ways it has in the past. Demographic change, particularly ageing, and smaller household size will be significant factors in the need for different kinds of housing. Importantly the region must catch-up to the need for more low-income and affordable housing.

Findings D4. Sherwood's 2018 – 2038 Housing Needs Analysis (HNA) and subsequent updates identified a deficit of land of about 610 housing units within its current UGB to meet its projected house needs. On the other hand, The Sherwood West concept plan proposes between 3,000 and 5,500 housing units on new UGB lands "to address the city's current deficit of residential land and additional demand that is expected"

This is an enormous difference between what Sherwood states its needs in its HNA and what the above UGB will provide for are. There is no analysis to support that either city or the region needs this amount of housing at this location.

The most relevant analysis is that Sherwood identified a deficit of 608 housing units within its current urban growth boundary through its 2018 – 2038 Housing needs Analysis and subsequent updates. This work by itself does not justify adding 1,290 acres to the city's urban growth boundary which would only net 430 net buildable acres, much of which is proposed to be accommodated by employment uses. Furthermore, there is no evidence presented that a housing deficit exists within the south-west portion of the Portland metro urban growth boundary at this time. This is especially so in view of ongoing development of thousands of new homes in the River Terrace 1 and 2 and Cooper Mountain UGB expansion areas.

From a housing production perspective, the West Sherwood Concept Plan concept provides an example that about 1,500 units of multi-family and mixed-use housing can be accommodated on less than 100 acres. This undercuts the assertion that almost 1,300 acres are needed for the UGB expansion. Furthermore, upon review of potentially vacant and redevelopable land inside the City a very large number of single family and multi-family units could be built on undeveloped and underdeveloped land under the right policy conditions.

Portland State University's Population Research Center projects that the metro region's rate of population growth will decline, including that of Sherwood and other Metro cities to about .5% per year in the coming decades. Furthermore, the region's population, including Sherwood's, is getting older. Seniors will be a much larger demographic segment in the mid to longer term. This will have impacts on the housing market, as older adults transition from existing single-family homes. The consequences of existing single-family dwellings coming onto the market is unknown but has the potential to meet part of future demand for single family housing.

On the issue of housing affordability, I agree with the arguments made by other objectors, including Housing Land Advocates, 1000 Friends of Oregon and the West of Sherwood Farm Alliance.

Conclusion: The Sherwood West Concept Plan simplified regional housing need and conditions to justify a low density UGB expansion that will not appreciably address the regions need for a variety of housing types to serve a range of housing needs. Furthermore,

the UGB Concept Plan over-emphasized regional population growth and correspondingly inflated Sherwood's and the region's need for future housing. Also, the Concept Plan did not consider less expensive and more accessible development alternatives to the UGB expansion.

The cost of new residential units in the UGB area including apartments, and "middle housing" will likely be a barrier even to people now experiencing homeless or being significantly underhoused. Subsidized and transitional housing types are also needed. The West Sherwood plan does not address these specific housing needs.

Metro Council's approval of the Sherwood West UGB expansion (Ordinance 24-1520) is not consistent with its Title 11 Planning for New Urban Areas because the cost of future infrastructure will make it difficult near impossible to build needed housing and for efficient urbanization to occur. In this context the UGB expansion is it is It is also counter to Metro Functional Plan Titles 1 and 7, Housing Capacity and Housing Choice.

Recommended remedy: LCDRC should reject Metro's housing affordability analysis and remand the decision to Metro to reconsider what ways and places would do the most to increase the supply housing for the majority of residents who will never be able to afford to buy a home or rent an apartment in Sherwood.

E. CLAIM: SHERWOOD WEST URBAN GROWTH BOUNDARY EXPANSION WILL DO NOTHING TO ADDRESS THE CITY'S IMBALANCE OF JOBS TO HOUSING AND WILL INCREASE RATHER THAN DECREASE DRIVING IN THE REGION.

Discussion: The ratio of jobs to housing in a city and the types of jobs available are important issues but the Sherwood West Concept Plan misuses the concept. In general, most suburban cities have a reasonable ratio of jobs to housing. However, many, if not most residents work elsewhere – in nearby cities. Where this becomes a problem is where jobs in suburbs are so lacking that long distance commuting must occur from far-away locations.

From this perspective the Sherwood West UGB proponents have unreasonably appropriated the job-housing balance issue. The Concept Plan report claims more commercial and economic development will create jobs that will be taken by Sherwood residents. However, more jobs in one location does not result in people locating to be near these jobs, when they have the means to commute.

Finding 1E. Within metropolitan regions that have integrated regional economies and reasonably developed transportation systems, it is not possible for local policy action to create a localized balance of jobs to housing. Simply expressed, people who take a job in one location, may in a few years decide to work in another within the same region. However, they do not pack up their household and move to Sherwood from Beaverton or Tigard unless costs and other factors turn out to be advantageous, such as significant income increases or housing affordability.

Housing location is dependent on many factors other than job location including financial equity in existing homes and other property, personal relationships, schools, civic and religious association, mobility and importantly, income. Matching Income, housing affordability and access to jobs, are key components of creating localized jobs to balance conditions. However, in Metro regions, with reasonable transportation systems there is little that local governments can do to affect this.

The job housing balance issue matters more when people must commute from outside the region from areas such as distant Yamhill County, Woodburn, Estacada, Salem /Keizer, Rainier, etc. One factor is because housing in the Metro area is economically beyond reach. However, anecdotal evidence suggests many people, who do these commutes, are vested in their communities and prefer to live there. This is particularly true for those with families. Furthermore, technology has changed the nature of work and remote and hybrid work makes job and housing proximity less important.

Where local policy can make a difference in matching jobs to housing is to take actions promote safe, well, designed affordable housing that has transit access, including that for lower-income persons.

As with housing it is not possible for local jurisdiction to exert policy control to match business siting requirements with housing need and residents' skills. Nor is it possible for local land use controls to impact the types of businesses that would provide jobs residents will take. Also, the real estate market in this respect is regional or sub-regional in scope and dependent on many factors which local governments cannot control.

From a business location perspective, it is most likely that medium and small-scale businesses, office and industrial uses might locate in the in West Sherwood – not major companies or corporate offices. The Portland Metro Region already has inventory of these types of available lands. For example, the Hillsboro, Portland and Gresham sub-regions region will continue to dominate the high tech and manufacturing sector. Because of the

desire of technology industries to co-locate there will likely be a little spill-over to Sherwood of major higher-level technology jobs including research and development

Conclusion: The Sherwood West UGB expansion cannot meaningfully impact the city's job/housing balance either from the housing or job side because of the above-mentioned factors. The more likely outcome of Sherwood West's development pattern will be perpetuating the current suburban model of automobile dependent commuting between communities. The exception to this would be for the City to adopt policies and implementing measures that would promote development of significant affordable, moderate- and low-income housing to allow those entering the work force ,or whose skills ,match locally available jobs. This rationale for expanding the UGB is inauthentic. Without proof it is not a reason to expand the Urban Growth Boundary and is contrary to Metro Functional Plan Titles 1, 2, and 11 - Housing Capacity Housing Choice and Planning for New Urban Areas.

Recommended remedy: Remand the decision to Metro and direct the Metro Council to either demonstrate that increasing jobs in Sherwood would lead to reductions in driving and if not, to eliminate that is a factor in its current and future UGB decision making.

OBJECTION F: THE CLAIM THAT THE LAND SUPPLIED BY THE SHERWOOD WEST UGB EXPANSION WILL MEET OVERALL LAND NEED FOR EMPLOYMENT AND HOUSING IS UNSUPPORTED OPINION CONTRADICTED BY LOGIC AND THE FACTS:-

Discussion: The housing need issue has been addressed previously but it must be emphasized again that the Sherwood West UGB expansion is being proposed in the context of already developing River Terrace and Cooper Mountain UGB expansions that will provide many thousands of new residential units.

There is no quantitative information tied to locational need to support from these "opinions" from stakeholders that justifies an additional 1,290-acre UGB expansion for in this location for additional residential or employment uses of the scale proposed.

Findings F1: The statement of letters of support from 20 key employment stakeholders is misleading. There are no affordable housing providers in this group that explicitly state they need developable land in this specific location. Most of those who signed are economic development organizations and boosters, realtors, home builders and other development related businesses that have economic interests in the UGB expansion. Several local governments, including service districts also signed on, but they do not

provide employment in the private sector either, or do they provide housing. It would be more impactful if there were actual providers of low- and moderate-income housing, businesses- manufacturing companies, finance and banking organizations, health care institution's, etc. that provided data-driven reasons why they need land in this location to site their business operations.

Conclusion : This claim that stakeholders believe the expansion will provide needed land for housing and employment is an “opinion” which does not itself justify expanding the west Sherwood UGB. The claim cannot be supported by findings to show compliance with Functional Plan Titles 1, 2, and 11- Housing Capacity, Housing Choice and Planning for New Areas.

Recommended remedy: It is a false premise that the concept of jobs-housing balance is a reason to expand the Sherwood urban growth boundary. It cannot be factually supported. The remedy is to remand the decision to Metro to address its Code requirements to purposefully and factually opportunities for those who need affordable housing types and employment

OBJECTION G: THE SHERWOOD WEST PROPOSAL DOES NOT “BUILD ON OUR REGION'S STRONG HISTORY OF PLANNING” AND IS NOT “POISED TO DELIVER NEEDED RESIDENTIAL AND EMPLOYMENT LAND.”

Discussion: Previous UGB for planning for a Sherwood West Expansion occurred in 2018 - 19. It was discontinued because of the cost of providing services, strong opposition from the public and determination it was not needed. Based on this, the assertion that the current UGB expansion is the result of “strong planning” cannot be considered a factor to support it. From a cost perspective, the UGB will have significant short and long-range costs, result in overall very low densities, be automobile dependent and, likely be opposed by the public if the question was asked directly.

Finding G1: From a cost perspective, the expense of providing public services has increased from when the first planning effort for Sherwood West was done in 2018. Also, at the time the public was asked through an online survey if there was support for the expansion. The expression of non-support was overwhelming .

Furthermore, the statement Sherwood and the region have jointly undertaken strong planning in the area is contradicted by the location of the Sherwood high school West of

Hwy. 99 W. From a planning perspective this was a very poor planning decision from urban design/location, transportation access location and serviceability perspectives.

Conclusion: Sherwood's current and past planning efforts cannot be a factor in justifying the currently proposed UGB expansion. The previous expansion efforts for the area were abandoned because of costs, opposition from the community and a determination it was not needed. Furthermore, Sherwood's compliance with Metro's functional plan requirements to designate town centers corridors and increase the opportunity for dense housing and housing types inside the current city limits does not justify an UGB expansion.

Recommended remedy: Remand the decision to Metro directing it to disregard past planning efforts, including those supported by planning grants from Metro, as a basis for a UGB expansion.

CLAIM OBJECTION H: THE CITY OF SHERWOOD DOES NOT COMPLY WITH ALL METRO AND STATE HOUSING PLANNING REQUIREMENTS PERTAINING TO HOUSING INCLUDING HAVING AN ADOPTED HOUSING NEEDS ANALYSIS. AND THE CITY WILL NOT GROW AT AN AVERAGE ANNUAL GROWTH RATE OF 1.1% CONSISTENT WITH METRO PROJECTIONS.

Discussion: Sherwood's actions in the past several years may comply with the technical requirements of metro and state housing rules and legislation, but this is not applicable criteria to evaluate whether or not the West Sherwood UGB Expansion is justified. It is merely stating facts.

Findings I1. What is factual is that Sherwood like the rest of Washington County will experience declining annual growth rates to within the vicinity of 1 percent in the near term and then declining lower in the coming decades. This is inconsistent with the Sherwood West Plan's unsupported claims that the city may grow faster than the metro forecast in the coming years. Also, the city's own Housing Needs Analysis (HNA) acknowledges the City's growth rate will decline. West Sherwood Concept Plan goes further to justify the UGB expansion this by proposing the City's higher growth of the past two decades as an example of what "might" happen.

The most recent Portland State University population projections state that Washington County has been growing approximately 1.05% /year for the past 10 years. During the forecast period PSU's population report expects the county's population growth to

continue to decelerate further. The city of Sherwood's population growth and demographics will exhibit similar characteristics.

Conclusion: The consequences of demographic shift and projected lower growth rates on housing has implications both for Sherwood and region wide. Lower growth rates and changing household characteristics do not justify this UGB expansion, especially in view of thousands of new units being built in the River Terrace and Cooper Mountain UGB areas. For example, demographic change will require adaptive reuse and infill of residential and other lands inside current urban growth boundaries to create livable, compact, accessible, and multigenerational neighborhoods.

Therefore, the proposed UGB expansion proposal is not consistent with Metro Code that it consider Goal 14 factor related to the "efficient accommodation of identified land need" or the desired outcomes identified in Chapter 1 of the Regional Framework Plan.

Recommended remedy: Remand the decision to the Metro Council to reconsider its projections for growth rates and to consider as an alternative to the Sherwood West UGB expansion to adaptive reuse and infill of residential and other lands inside current urban growth boundaries to create livable, compact, accessible, and multigenerational neighborhoods.

OBJECTION I: THE PROPOSED UGB EXPANSION WILL NOT MAKE EFFICIENT USE OF PUBLIC TRANSIT SYSTEMS, PEDESTRIAN AND BICYCLE TRAVEL TO COMMERCIAL AND CIVIC SERVICES

Discussion: This matter has been addressed above but is important stress again . The reason is it's speculative in view of what is known about the UGB expansion in terms of costs, natural resource and other geographic characteristics and the prospect it will be developed to very low densities.

I1. Findings: As previously concluded the 1,290-acre urban growth boundary expansion will not make efficient use of public investment in needed transportation infrastructure and other needed services. It will only result in about 430 acres of net developable land within an area three-times as large. There will be significant inefficiencies associated with building infrastructure that will cost many millions of dollars more , when compared to making more efficient use of land inside the existing urban growth boundaries and or targeting land that is much better situated to provide needed housing and jobs.

Conclusion: it is erroneous to claim that the proposed Sherwood West Concept Plan will result in a diverse set of land uses which will make efficient use of public infrastructure and support pedestrian and bicycle travel to commercial and civic services. Furthermore, approval of the Plan and expansion of the urban growth boundary is contrary to Metro Functional Plan Titles 1, 7 and 11 - Housing Capacity, Housing Choice and Planning for New Urban Areas.

Recommended remedy: See remedy proposed in response to prior objections.

OBJECTION J : THE UGB EXPANSION IS NOT NEEDED TO PROVIDE LAND FOR EMPLOYMENT USES

Discussion: The 2021 Sherwood Economic Opportunities Analysis (EOA) concluded, that considering existing developable land, including 127 acres within the Tonquin and Brookman areas, there was no basis for additional new land to accommodate future commercial or industrial employment during the period 2021 – 2041. The 2021 EOA stated that Sherwood had 249 unconstrained acres of employment land and about 124 acres available within the short term - five years.

However, the 2021 EOA numbers did not provide the proponents of the UGB expansion adequate justification to expand the UGB, in the West Sherwood area, so the city undertook an EOA update in 2023 to do so. The approach used in the new EOA provided the city greater flexibility in determining employment land need-based on new methodologies, aspirations and the unproven premise that it could “target” certain kinds of industry and other kinds of economic activity.

Findings J1: The more recent EOA - concluded that the city will need 485 net acres of employment land between 2022- 2042 . This is 236 acres more than currently; and of this, 143 acres may be required in the next five years.

The newer EOA also recommended that developable sites of significant size be made available size to attract major employers. Specifically, it referenced the need for “development-ready” larger sites for semiconductor and other technology-based industries.

In addition, as in effort to justify significant employment land expansion the revised EOA referenced the 2021 Federal Chips and Science Act legislation that emphasized the national need to increase semi-conductor manufacturing. Significant federal funds were

made available to promote/support technology manufacturing. It was speculated that additional industrial land in the Washington County could be a contender for these land uses. Business Oregon, Port of Portland and Oregon Business Council then prepared a publication that claimed no sites existed inside Oregon UGBs for large semiconductor manufacturers and that the only acceptable lands were on rural reserve lands near Hillsboro. However, once asked, Oregon Cities identified 10,000 acres of development-ready industrial land including several very large sites close to the Portland International Airport (PDX). The overall result of this was some federal funding was granted to technology projects on lands already inside cities. In Oregon these funds provided to modernize existing manufacturing, and product development facilities and not build on new sites.

Metro's recent employment lands analysis also found that there is adequate land for employment growth withing the existing UGB including technology uses for the foreseeable future.

Conclusion: The UGB expansion for employment lands is not justified from the proof provided. The reasons are anecdotal, especially for technology uses. From a regional perspective Metro's current land inventories indicate that there is enough industrial land inside the UGB to accommodate regional needs. Furthermore, from a site planning perspective and natural resource constraints the 130 acres proposed for mixed employment is more suited for smaller, industrial and office parks, specialized manufacturing, etc. than it would be for larger technology related manufacturing uses. These are the same kind of land uses that could locate on already available industrial lands within the Sherwood-Tualatin area UGB. Furthermore, for these reasons this UGB expansion is inconsistent with the Metro Regional Framework Plan Principles 1.4.2.

Recommended remedy: Remand the decision to Metro to reconsider its conclusion that the region needs additional sites for high-tech manufacturing, given the already available lands within the area of Sherwood and Tualatin inside the UGB.

OBJECTION K. THE CONCEPT PLAN CALLS FOR CHICKEN CREEK AND RELATED NATURAL AREAS AND ECOLOGICAL SYSTEMS TO BE SURROUNDED BY URBAN DEVELOPMENT. THIS IS A RECIPE FOR THEIR DESTRUCTION NOT A "BOLD VISION FOR THEIR PROTECTION"

Discussion: Other than simply stating that protection of natural areas and ecological systems will occur, the concept plan does not provide specifics how this will happen.

Findings L1. The Sherwood West Concept plan did not address the protection and/enhancement of the functions and values of the area's natural resources. First it does not acknowledge from a future regulatory perspective, the boundaries for the area's floodplain, topographic hazards, major tree groves, or wildlife habitat. Nor does it discuss the relationship of the area's natural resources with the overall health of Tualatin and Willamette River basins and how this would be enhanced. For example, future development will result in millions of square feet of impervious surface associated with development that will require storm water treatment and conveyance to the surface water system. Policies and standards are needed to prevent harm to existing natural drainage ways through pollutant and sediment loads and higher temperatures. Also, preliminary engineering concepts show major sewer trunklines being located along the Chicken Creek waterway. This is archaic and utility service plans must make a commitment to minimize harm to stream corridors and associated natural systems. Furthermore, the concept plan does not address, even from a general perspective, future development standards, needed to ensure the integrity and quality of the area's natural resources.

The public use of the Chicken Creek Greenway will depend on a well-developed trail system that likely cannot be funded by existing system development charges and other sources. This is described in greater detail above.

Conclusion: The Sherwood West Concept Plan presents no vision for Chicken Creek or other natural resources, let alone a bold one. The concept plan presents no evidence that there is valid intention to protect or enhance the area's natural resource qualities, functions and values through regulatory means. also, for the above these reasons the UGB expansion as approved by Metro is also inconsistent with Metro Functional Plan Titles 3 and 13 Water Quality and Flood Management and Nature in Neighborhoods.

Recommended remedy: Remand the decision to Metro to either explain how surrounding Chicken Creek and its riparian area and other natural resources areas supposedly protected by Title 13 will be protected and enhanced by roads crossing them, the runoff from surrounding paved area, and the impact of pets and invasive plants, or to find other ways or places to meet regional housing and employment needs that are not so destructive.

OBJECTION L. THE DEVELOPMENT PROPOSED IN THE CONCEPT PLAN IS INCOMPATIBLE WITH EXISTING FARM AND FOREST PRACTICE EITHER WITHIN THE PROPOSED UGB EXPANSION AREA OR OUTSIDE IT.

Discussion: Absent a much more innovative plan, the claim that development in the Sherwood West UGB expansion will be compatible with farm and forest practices inside or adjoining the UGB must be declared false on its face. Agricultural operations cannot exist with the scale of urbanization proposed by the concept plan. There are reasons why there is a separation between urban development and farming. Farming practices cannot co-exist with urban development. The conflicts are too great.

It is ironic from this perspective that it is claimed that part of the Sherwood West Concept is intended to serve as a “gateway to wine country” when the result will be the end of the Concept Plan’s winemaking businesses and other agricultural businesses. Furthermore, it is merely promotional and speculative to claim Sherwood West as this when the cities of Newburg and specifically Dundee have claimed this title already backed it up with substantial agricultural tourism investment and have supported land use actions to protect the area’s vineyards

Finding L1: The consequence of implementing the concept plan will be the demise of several agricultural operations within the area. Urbanization will have consequences on both existing agricultural uses and supporting business operations who support them for goods and services. It will undermine the millions of dollars invested in the area’s wine growing and other agricultural operations. It will also disrupt the lives of farm workers who depend on the area for jobs.

Conclusion: Fundamentally, the encroachment of urbanization including, traffic impacts, results in conflicts that are contrary to the viability of agriculture inconsistent in this case with Metro Title 11 and the Metro and Goal 14 locational factors.

Recommended remedy: LCDC should find that Metro’s finding about the compatibility of its proposed urban development with nearby farm and forest practices is unsupported by adequate facts and reasonable understanding of those practices. Metro will then have to reconsider either its conclusion, gather new evidence and/or find a different location for a UGB expansion or take measures that will avoid the need for an expansion at all. File: Liberty suggestions to Ron Bunch Jan 2025

Attachment 2: 10/15/24 Memorandum to Metro Council and Core Committee

MEMORANDUM

TO: Metro Council and Metro CORE Committee
FROM: Ron Bunch
RE: Equity and the Sherwood West UGB Expansion
DATE: October 15, 2024

Introduction

My name is Ron Bunch, and I am entering this memorandum and attachment in the record for myself. My comments are based on my experience of 36-year career of land use planning and community development in Oregon; twenty-four of which were in the Portland Metro Region. I am attaching a summary of a report I submitted previously about Sherwood West and infrastructure costs. Its purpose is to provide context to the following.

Background Discussion

I attended the September 26, 2024, Metro hearing and listened with interest to the Metro CORE Committee's presentation that the concept planning process did not address or represent equity issues. I agree. My experience with concept planning is that the process mostly aligns the mutual interests of local government, economic development organizations, and those engaged in consulting, real estate, finance and construction. In this context economic, social and racial equity issues are seldom considered, if at all.

The Sherwood West Concept Plan is an example of this. Even though the concept plan proposes eventual annexation of 1,291 acres of land, it acknowledges that only about 605 acres is suitable for development. The net developable acreage is even lower – about 432 acres when land needed for public streets, parks and schools are taken out. The above study estimates that the cost of roads and services for the whole UGB will amount to \$472.8 million, or \$1.1 million per acre of developable land. These costs combined with system development charges would make it not feasible to build affordable and low-income housing. Furthermore, the area's overall low density makes transit infeasible.

Equity Focused Alternatives

If Metro Council and Sherwood are committed to equity, they must look for ways to provide developable land for housing and employment opportunities at much less cost. This can occur within the existing city, where services already exist and through policies and incentives that encourage infill and redevelopment. Also, the scope of the UGB expansion

proposal is too large and speculative. Much smaller, more easily served and developable areas should be considered first where different types of higher density and affordable housing would be feasible.

Infrastructure and Equity

The Sherwood West UGB. expansion will require a disproportionately high public and private investment to build and maintain new roads, water, sewers, and storm drainage systems for only 432 acres of developable land. Metro Council should ask, from an equity perspective, if it is equitable to leverage this scale of investment for such a low return . Fundamentally, are there ways to get much more affordable housing, accessible and safe transportation opportunities for more people from less or comparable investments elsewhere?

Copy: Jeffrey Kleinman
Robert Liberty
Nellie McAdams
Sam Diaz, 1000 Friends of Oregon

Attachment 1: Summary of Findings: Infrastructure Costs Sherwood West Urban Growth Boundary Expansion 9/26/04

File: Memo CORE Committee Metro Council

Attachment 1

Summary Findings: Infrastructure Costs and Land Use Implications: Sherwood West Urban Growth Boundary Expansion Proposal (9/26/04)

The following are the above report's main findings. These are based on information contained in the Sherwood 2024 Urban Growth Boundary Proposal, City of Sherwood budgets, fees and charges schedules, Clean Water Services (CWS) connection charges and Washington County's transportation development tax rates. The full report was submitted into the record at the above hearing.

Low Number of Net Developable Acres: The net developable land area within the proposed 1,291-acre UGB expansion is about one-third of total. This is only 432 acres, once undevelopable areas (steep slopes, stream corridors) and needed roads, utility easements, school grounds, public safety facilities and park land are removed.

High Cost of Public Roads and Utilities Costs Necessary for Development: The report estimates the order of magnitude of providing all public infrastructure to Sherwood West to be about \$472 million as follows:

Sherwood West Order of Magnitude Summary of Costs/Investments (Millions \$)

Highway 99 W Improvements	8.60
Foundational Infrastructure – Major roads, sanitary sewer collection system, water transmission lines, storm drainage conveyance and regional facilities and parks and trails	344.24
Development infrastructure – Streets and Utilities	119.00
Total	471.84

Costs for Highway 99 W Improvements to accommodate West Sherwood traffic are derived from Sherwood transportation planning documents. These estimates vary from the above low of \$8.6 million to \$30 million.

Infrastructure Funding Gaps: There are significant “funding gaps” for foundational infrastructure because some system development charges are inadequate. Sherwood would have to find a way to make up a deficit in the range of at least \$35 –\$ 45 million.

Other Costs for Schools, Highway 99W Crossing and Public Safety: Sherwood's UGB expansion plan did not consider other significant public costs, including elementary and junior high schools, a new fire station. These are estimated to cost about \$73 million.

High Infrastructure Costs Per Developable Acre: The above costs and the UGB expansion's low net yield per acre of developable acre results in high infrastructure costs to service developable land – up to \$ 1.1 million per developable acre.

High Cost of Infrastructure, City and County SDCs Added to Land Costs Would Make it not feasible to Build Affordable and Middle Housing.

Low-Density Development Would Make Transit Service Not Feasible and Increase Auto-Dependence. Residential density of Sherwood West, overall, would be very low. If the area accommodated 4,100 units, the overall housing density of the whole would be about 3.2 units per acre.

Parks Funding is Inadequate. The “foundational infrastructure” costs above do not include park and trail development. The City's parks SDCs, if applicable, are anticipated to yield between \$45 and \$50 million. At the expected cost per acre of developable land this might be adequate to purchase, but not develop, enough land for needed park improvements and trails.

The City of Sherwood Would Assume Substantial Long-term Maintenance, Repair and Replacement Costs for Sherwood West's Infrastructure. The City of Sherwood would assume major ongoing costs to maintain and eventually repair and replace many new miles of roads, sewer and water collection and conveyance lines and associated water pumping storage systems and sewer pump stations.

Inflation: The general costs of construction and maintenance of public facilities and services are based on present day assumptions. They are subject to inflation and will be significantly higher in coming years.

Natural Resource Lands – Stream Corridors: The Sherwood West Concept Plan acknowledges that a large part of the area is Metro Title 13 lands - stream corridors and riparian areas. These lands, steep slopes and other development constraints, make a significant part of the UGB expansion area difficult and expensive to develop. However, Sherwood's plans do not make specific recommendations how these areas would be managed to protect their natural resource functions and values.

Tualatin River National Wildlife Refuge: The Sherwood West concept plan acknowledges the proximity of the refuge but makes no mention of potential impacts of Sherwood West or measures to mitigate them.

File: RB 5 Summary Findings Sherwood West 101024

SHERWOOD WEST URBAN GROWTH BOUNDARY EXPANSION REVIEW OF INFRASTRUCTURE COSTS -

INTRODUCTION AND FINDINGS SUMMARY FINDINGS

The following summarizes infrastructure costs, housing affordability, land use and other issues not acknowledged by Sherwood in its 2024 Sherwood West Urban Growth Boundary (UGB) Proposal. Sherwood’s aspirational plan for UGB expansion was based on a predetermined outcome of how to urbanize West Sherwood rather than acknowledging the consequent risks and costs and whether these outweigh potential benefits. This report responds to these fundamental issues from an “order of magnitude” perspective which defines issues in broad themes. This process is often used in government and business venues to develop findings and criteria on which to base policy decisions. It is not dissimilar to what Sherwood and its supporters have done in developing a generalized development concept for Sherwood West. However, the questions to be answered are different. Often, this kind of approach addresses the most basic questions of whether to proceed or not, with a course of action.

A decision by the Metro Council to expand the regional UGB next to Sherwood by 1,291 acres would involve both private and public benefits and impose risks, costs and losses to several groups. An example is shown in Table 1. How these benefits, losses and risks are fairly mediated among stakeholders, including the region as whole, is a matter of public policy. In this context, it is important for the Metro Council to evaluate other growth options to ensure the development needs of both Sherwood and region are addressed in the most beneficial and least harmful ways possible. For example, decision-makers must ask, “Can needed housing and employment be better accommodated elsewhere and in different ways at less cost, risk and disruption.” For example, an alternative is that housing and employment needs may be better accommodated inside the existing Metro area cities and or targeted, more manageable and less impactful expansions.

Table 1: Benefits, Costs and Risks from Sherwood UGB Expansion as Proposed by West Sherwood Concept Plan.

Potential Beneficiaries	Motive and/or Benefits
PRIVATE BUSINESS, LOCAL GOVERNMENTS AND UTILITIES	
Property Owners and Land Investors	Financial gain from zoning commitments for entitlements and public investments

Commercial, Industrial and Residential Real Estate	Financial gain from real estate transactions and public investments from zoning and commitments for public investments
	Table 1 (Continued)
Banks and Financial Institutions	Financial gain from providing capital to private companies that urbanize the Sherwood West
Companies that do residential, commercial and public works construction	Financial gain from constructing the infrastructure and developing the area for urban use.
Existing Sherwood Businesses	Potential Financial gain from new Sherwood West residents and businesses but may be tempered by competition from new business.
New Commercial Business	Financial gain from expanded customer base.
School District and Special Service Districts and Private Utilities	Financial Gain: Larger enrollment and tax base, but must be balanced with need for future expenditures, including both capital investment, maintenance, administration and ongoing investment.
Washington County and Clean Water Services	Increased Revenues: Revenues from increased TDT and regional connection fees (RCC) would assist in expanding major street and sewer systems
PEOPLE	
Private Sector Workers (Not necessarily located in the region)	Short Term Jobs; Design, engineering, construction , real estate and public sector jobs
Public Sector Workers (Not necessarily Sherwood residents)	Jobs: Municipal, service district and education sector jobs
Those who need housing currently or in the future – home buyers and renters	Needed housing, but low-/ moderate-income housing and middle-housing may not be feasible due to costs
RISKS AND LOSSES	Description of Risks and Losses
Future and Existing Sherwood Property Owners and Residents	<p>Cost: Short and long -term public subsidization of UGB Expansion planning, management, and infrastructure maintenance.</p> <p>Costs: Personnel costs and refocus of political and administrative efforts on UGB expansion away from existing communities where more benefit can be derived.</p> <p>Costs: Increase in future utility rates and property taxes associated with development of extensive new urban infrastructure system ,inflation factors and maintenance of same in perpetuity.</p> <p>Quality of Life: Low transit feasibility, auto-dependence ,Increased traffic and traffic congestion and environmental degradation.</p> <p>Rapid changes in community character and disruption caused by significant period of major construction activity.</p> <p>Quality of Life and Cost: Climate impacts of auto-dependent development and environmental degradation of the area's natural resource functions and values.</p>

	<p>Quality of Life and Cost: Investment of time and resources in high-cost low return venture. No consideration of lower impact/cost alternatives to</p> <p>Table 1(Continued)</p> <p>meet future employment/ housing needs especially low- and moderate-income housing.</p>
Existing Property Owners, Workers and Agriculture	<p>Disruption of quality of life and uncertainty posed by spiral of property value speculation.</p> <p>Demise of existing agricultural operations urban encroachment; incompatible land uses; erosion of regional agricultural business infrastructure; hazard and disruption posed by increased traffic and congestion.</p> <p>Job loss for farm workers and vineyard operations and wineries;</p> <p>Loss of investment in farm and related business ventures and inability to acquire similar value land elsewhere.</p> <p>Disruption caused by long term construction activity.</p> <p>Loss of access to agricultural products .</p>
Environment and Climate	<p>Expansion of low-density auto-dependent sub-urban development with significant land, air, water, and energy consequences.</p> <p>Negative impact on local stream corridors such as on the Tualatin River watershed fish and wildlife habitat and water quality.</p> <p>Negative consequences for the adjacent Tualatin River National Wildlife refuge</p>

Summary Findings

The following are this report's main findings .These are based on information contained in the Sherwood 2024 urban Growth Boundary Proposal, City of Sherwood budgets, Clean Water Services (CWS) and Washington County connection charges and transportation development tax rates. Additional details and methodology follow about how the findings were derived.

Low Number of Net Developable Acres: The net developable land area within the proposed 1,291-acre UGB expansion is about one-third of total, or only 432 acres ,once undevelopable areas (steep slopes, stream corridors) and needed roads, utility easements, school grounds, public safety facilities and park land are considered. This is illustrated by Table 2 below.

Table 2: Sherwood West Net Buildable Acres

Net buildable Acres (per Sherwood West UGB Concept Plan)	605
Less transportation 20% ROW and Utility Easements	(120)
Less Schools and possible Fire, Life, Safety Facility	(43)
Less Urban Parks	(50)
Total Net Buildable Area	432 Acres

Funding Gap for New Major Roads and Utilities: The total cost of major roads, sewer and water lines, and storm drainage facilities necessary to set the stage for development is estimated by the UGB Concept Plan to be in the range of \$344 million per the City’s most recent consultants estimates This includes \$46-50 million is needed for parks.

The plan proposes that development would “front” these costs through system development charges (SDCs). However, the City’s consultant identified significant “funding gaps” that would have to be addressed because SDC’s in some categories are not adequate. Sherwood would have to find a way to make up a deficit likely in the range of \$35 –\$ 45 million based upon projections. In addition, all or some of the SDC charges will be incorporated into the price of the housing, making it difficult for developers to deliver needed affordable housing, especially given the low densities that Sherwood and the Metro Chief Operating Officer (COO) are proposing.

It’s important to stress that Sherwood’s ability to levy SDCs to fund needed streets and utilities is much less than that of Clean Water Services and Washington County. The city is a “junior partner” in this respect.

Parks Funding is Inadequate. The “foundational infrastructure ” costs above do not include park land acquisition and development. The City’s parks SDCs, if applicable, are anticipated to yield between \$45 and \$50 million. At the expected cost per acre of developable land this might be adequate to purchase, but not develop, enough land for needed parks. If expended for land acquisition, these funds would also not be available to build the trail system proposed by the UGB Concept Plan.

Other Costs Schools, Highway 99W Overcrossing , Public Safety: Sherwood’s UGB Expansion plan did not consider other significant public costs, including elementary and junior high schools, a new fire station, and road improvements to Highway 99W such as overcrossing and street intersection improvements. These are estimated to be at least \$81.58 million. Schools and a new fire station represent “down-stream” costs and not

necessary for actual development of the Sherwood West. However, they are important to acknowledge as part of the total cost burden the public will carry.

Roads and Utilities Costs for Private Development: The cost of providing all infrastructure to the Sherwood UGB Expansion area includes neighborhood streets, smaller (8”) water, sewer and storm drainage lines, plus including all other parts such as catch basins, manholes, fire hydrant, etc. needed to serve private development. This is usually paid for by private development directly (not through SDCs) and recouped after property sales. This analysis estimates private development costs at about \$119 million based on the preferred land use concept in the UGB expansion plan.

Table 3: Sherwood West Order of Magnitude Summary of Costs/Investments (Millions \$)

Highway 99 W Improvements	8.60
Foundational Infrastructure – Major roads, sanitary sewer collection system, water transmission lines, storm drainage conveyance and regional facilities. Includes parks and trails	344.24
Development infrastructure – Streets and Utilities	119.00
Total	471.84

Note:

- **Costs for Highway 99 W Improvements to accommodate West Sherwood traffic are derived from Sherwood transportation plans. These estimates vary from the above to \$30 million.**

High Infrastructure Costs Per Developable Acre: The above costs and the UGB expansion’s low net yield per acre of developable acre results in high infrastructure costs of developable land – up to \$ 1 million per developable acre.

High Road and Utilities Costs, City and County SDCs Make it not Feasible to Build Affordable and Middle Housing: High system development charges, transportation and utility costs, will make it not feasible to build affordable and middle-income housing in Sherwood West.

Overall Low-Density Residential Development Precludes Transit Service and increases Auto-Dependence. Development of Sherwood West would have remarkably low density. Consider if the whole area of 1,292 acres accommodated 4,100 units, the overall site density would be about 3.2 units per acre.

The City of Sherwood Would Assume Substantial Long-term Maintenance, Repair and Replacement Costs for Sherwood West’s Needed Infrastructure. The Sherwood West UGB Expansion would result in the planning ,engineering, and construction of miles major sewer and water collection and conveyance lines and associated water storage tanks and

water and sewage pump stations. In addition, there will be several miles of new and reconstructed major collector and arterial streets in the area.

Sherwood would assume long term maintenance and repair of these major systems and also the utilities that support actual development. These are major ongoing costs, and per the City's 2023-2024 budget. It costs about \$8.2 million a year to do so for utilities inside the current City limits

It estimated that Sherwood's property tax and utility rate payers would take on the maintenance, repair and replacement (MRR) of an additional 72 miles of water, storm and utility lines and 26 to 34 miles of streets and roads associated with residential and commercial development. This new infrastructure would be added to the existing 61 acres of parks, 59 miles of road and 215 miles of utility lines inside the existing City limits.

Sherwood's current combined operations and maintenance budget for maintenance, repair and replacement of its existing roads and utilities is \$8.242 million per [Sherwood's 2023-24 budget](#). This would increase substantially with Sherwood West added to the city. Other public services, such as law enforcement, city administration, finance, planning, building inspection, etc. would also increase in proportion to land area and population.

Inflation: The general costs of construction and maintenance of public facilities and services are based on present day assumptions. They are subject to inflation and will be significantly higher in coming years.

Natural Resource Lands – Stream Corridors: The Sherwood West Concept Plan acknowledges that a significant part of the area is Metro Title 13 lands - stream corridors and riparian areas. This, and steep slopes and other development constraints, makes a significant part of the UGB expansion area difficult and expensive to develop. However, Sherwood's plans do not make specific recommendations for these areas other than they would be set aside for open space and natural areas. How this will happen and/or what entity would be responsible for ensuring protection is not known. For example, will these lands be part of large estate type subdivisions and become common open space tracts subject to management by a property owners association? Alternatively, is it aspired that some or all this land be public and managed by a public entity? Regardless, these lands will require oversight and management to ensure natural resources functions and values are maintained and do not present hazards to surrounding areas, such as wildfire, flooding and landslide.

Tualatin River National Wildlife Refuge: The Sherwood West concept plan acknowledges the proximity of the refuge but makes no mention of potential impacts of Sherwood West or measures to mitigate them. This is an important issue that must be addressed when making the UGB expansion decision.

BACKGROUND AND METHODOLOGY FOR ASSIGNING ORDER OF MAGNITUDE COSTS

Three categories of infrastructure costs for the UGB expansion are generally quantifiable. The first is the UGB expansion's need for "foundational infrastructure." This is the set of public facilities - major roads, surface water management, water and sewer lines that, per Sherwood's consultants' assumptions, are needed to "catalyze" private development in Sherwood West. This consists of the larger water, storage, conveyance and pumping systems, sanitary sewer collection, pumping conveyance system and major roads usually classified as major collector and arterial streets. The second cost category is related to the "development infrastructure" such as that needed to build a residential subdivision, apartments, industrial areas, etc. Once private development projects are completed and accepted, the city assumes ownership and long-term maintenance, repair and replacement costs. This is an important consideration because maintenance, repair and replacement (life-cycle costs) sometimes equal or exceeds the initial costs as facilities wear out and need replacement or remodeling over time. The final cost category includes public, but non-municipal, services. This includes things such as new elementary and middle schools, public safety facilities (fire station) and needed improvements to Highway 99W. Fire stations and schools are not needed for development to occur but need to be realized because of development much like maintenance, repair and replacement of infrastructure.

How Would Roads and Utility Infrastructure in Sherwood West be Funded.

Infrastructure must be in place before development occupancy can occur. Local governments and sometimes state government require infrastructure to be provided either before, or in conjunction with the use or occupancy of new development. For example, a new residential subdivision that would increase the traffic capacity of a major collector street would have to pay for adding lanes, intersection improvements, traffic lights, etc. This requirement is in proportion to a development's impacts on the street's safety and capacity. The same principle applies to other facilities such as needed sanitary sewers and storm drainage and surface water quality systems.

In Oregon, system development charges (SDCs) are one of the ways through which developers pay their projects' proportional cost of needed major infrastructure and to reimburse local governments for their investment in existing utility systems. This is one of the ways through which infrastructure will be funded in Sherwood West. The three primary sources of SDC revenue are [City of Sherwood SDCs](#), [Clean Water Services \(CWS\) regional connection charges \(RCC\)](#) and [surface water fees](#), and the [Washington County transportation development tax \(TDT\)](#). The Washington County [major streets transportation improvement program \(MSTIP\)](#) may also contribute by partially funding selected arterial street improvements.

All Infrastructure needed to serve specific developments, such as local streets, smaller water lines, and storm drainage are mostly paid for and built by developers to local government specifications. These costs, like SDCs, are rolled into the purchase, or lease price of property. They are in addition to SDC charges included in the cost of a new house.

SDC costs in Sherwood are significant. For example, the current charge for single-family home is about \$51,500.

Once infrastructure is completed, inspected and approved, ownership is assumed by the City, which guarantees its maintenance, repair and replacement over the long term. Revenue for this comes from public utility fees and charges and property taxes. Larger replacement and maintenance projects, as happens when roads and utilities wear out, is often funded by capital reserve funds augmented by general obligation and revenue bonds and when available, state and federal assistance.

Parks and related facilities open space, and trails are considered infrastructure but, in most cases, the land is acquired, improved and retained by local governments. In the case of Sherwood West, development would be also subject to the city's Parks SDC.

The combined cost of all infrastructure, subject to systems development charges and other exactions charges such as permits, water connections and fees associated with the building process, are passed on to the consumer. This has a significant impact on the cost of new housing and other new development. In addition to SDCs, it's acknowledged that there are many other fees and charges are associated with building and engineering permits, inspections, water meter installations, planning review, permit administration, etc. These add up to significant costs depending on the scale and complexity of a project.

How Sherwood West Foundational Infrastructure Costs and Funding Gaps Were Determined: Sherwood's city engineering staff and its consultants prepared several order-of-magnitude cost scenarios based on a variety of land use mix scenarios. These are part of [Appendix O of the Sherwood West urban Growth Boundary Proposal – 2024](#). The latest estimates were done in February 2024. The cost of foundational infrastructure at that time was estimated to be \$334.027million. Infrastructure costs and funding gaps are summarized by Tables 4 thru 6.

These examples show that the City of Sherwood's systems development charges are minor contributors towards meeting the costs of needed infrastructure, compared to Clean Water Services Regional Connection Charges (RCC) and Washington County's Transportation Development Tax (TDT). The one area where it may provide adequate funds is parks. In this instance the park funding may be enough to purchase the land but not develop it. However, though important, parks do not contributor to actual land development.

Table 4: Estimated Costs of Sherwood West Foundation Infrastructure by District - \$Million

	Water	Sewer	Storm	Parks	Roads	Totals
North	10.75	18.16	10.93	23.43	72.85	136.12
Far West	8.37	4.80	2.76	0	26.92	42.37
West/ S. West	29.17	10.01	6.18	23.82	85.79	154.97

Totals	48.59	32.97	19.87	47.25	185.56	334.24
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Table 5. Funding Gap Analysis all Districts – Low Density Housing (0%) Middle Housing-
\$ Million

Water	Sewer	Storm	Parks	Roads	Total w/ all Revenue)	Total w/City Only
-18.79	32.30 (surplus)	-14.57	7.93((Surplus)	-17.54	-10.65	-203.53

Table 6. Funding Gap Analysis all Districts – High Density Housing (20%) Middle Housing-
\$ Million

Water	Sewer	Storm	Parks	Roads	Total w/ all Revenue)	Total w/City Only
-9.37	39.98 (surplus)	-13.62	\$23.90 (Surplus)	-10.04	30.78 (Surplus)	-175.078

Notes:

- **Source: Sherwood West Concept Plan (Feb. 13, 2024, Memo from Leland Consulting Group to Eric Rutledge, City of Sherwood)**
- **Surpluses in one SDC Category cannot be used to address deficits in another**

The policy related financial issue the City must address is, how can it cover the above financial shortfall?” The Sherwood West Concept Plan recommends that the city consider funding sources such as supplemental or increased system development charges (SDCs), local improvement districts, city-wide increased utility rates, and urban renewal to partially pay for infrastructure.

There are disadvantages of all these methods. They would increase costs for development, thus making it less feasible and transfer some costs of UGB Expansion to existing Sherwood taxpayers and ratepayers.

Development Related Infrastructure Costs: Development projects such as single-family subdivisions, office parks, and multi-family projects pay for the construction of local streets and utilities that directly serve these land uses. Traditionally, these are usually two-way streets usually within 30’ to 36’ rights-of-way that include water, sewer, storm drainage/water quality infrastructure. Some jurisdictions allow smaller streets through master planned projects’ such as planned developments. Street density is a valuable urban design tool to provide for walkable neighborhoods, especially in mixed-commercial/residential environments.

Some Industrial and commercial uses require larger streets constructed to accommodate large trucks. Most often industrial land uses have relatively low street density because uses typically require larger sites. Internal site circulation is often provided by easements that meet standards for fire protection. Commercial land uses locate within high traffic volume areas most often front on major collectors and arterials for access and pay commensurate SDC's and or participate in the costs of road and utility construction.

Water and sewer utilities are most often in public rights of way. If not, they are within located within dedicated easements. These typically consist of eight-inch water and sewer line lines unless design and fire flows require greater capacity. Sometimes industrial and commercial will require greater fire flows hence water lines are often installed up to 10"-12." Local Storm drainage systems also must manage flows and water quality. This means the curb and gutter, catch- basin and pipe system is often augmented by vegetated in- street structures, vegetated swales and local water quality facilities. Within West Sherwood CWS regional water quality facilities will be needed. These are often constructed by development to CWS's specifications.

The following estimates were calculated based on acreages of land use scenarios assigned by the Sherwood West UGB Concept Plan's various land use scenarios. It is acknowledged that site design is a significant factor in the quantities of utilities needed and there will be differences in quantity and costs associated with actual development occurs.

A summary of estimated quantities of private development streets and utilities for the UGB Concept's Plans preferred land uses is shown by Table 5 below. It is a compilation of tables 6 through 9 that follow

Table 6 – Summary of Estimated West Sherwood Private Development Costs Per Sherwood West Concept Plan Acreage Allocations

SF (L/M/H) Middle Housing, Cottage Cluster	Acres	Streets K/L'	Sewer K/L'	Water K/L'	Storm K/L' (Equivalent)	Total Cost \$ Million
	308	87.00	87.00	87.00	87.00	68.47
Muti-Family	33	7.87	7.87	7.87	7.87	7.05
Mixed Employment	130	18.48	18.48	18.48	18.48	18.84
Mixed Resident/Comm	25	8.5	8.5	8.5	8.5	8.50
Hospitality - Entertainment	63	15.75	15.75	15.75	15.75	15.68
Sub-Total	559	137.6	137.6	137.6	137.6	118.54

Notes:

- SF(L/M/H Density) Street Density = 20.7% of assigned land area.
- Multi-Family Steet Density = 17% of assigned land area

- Mixed Employment Street Density = 12% of assigned land area. Framework streets only would be developed. The site users would develop interior sites specific to their needs.
- Mixed Residential Commercial Street Density = 25% of assigned land area
- Hospitality/Entertainment Street Density = 25%+ of assigned land area

The acreage total above does not include the following :

- 40 acres for elementary and junior high schools,
- About 60,000 sq. ft (1.5 acres) for a new fire station
- Seven acres of commercial land that was not included for reasons explained below
- For the purposes of this analysis park acreage is distributed in the various land use districts and included as part of respective land use categories.

**Table 6A: Single Family, Middle Housing , Cottage Cluster
Streets and Utilities – Estimated Development Costs \$Millions**

Streets	87KL'	Sewer	87KL'	Water /L'	87KL'	Storm	87KL'
\$300/ L'	\$26.10	\$170/L'	\$14.790	\$160L'	\$13.920	\$180L'	\$15.66
Grading, base, paving, sidewalks, etc.		Includes manholes and clean outs, etc.		Includes, hydrants appurtenances, vaults etc.		Includes manholes, catch, basins, etc.	

**Table 6B: Summary Sherwood West Single Family Residential Street and Utilities
Development Costs: (\$Millions)**

Streets	\$26.10
Sanitary Sewer	\$14.790
Water	\$13.920
Storm	\$15.66
Total	\$68.470 Million

Notes:

- Residential Street Miles (Estimated). Street Connectivity is assumed to be between 200 -400 feet.
- Does not include accessory dwelling units because they most often share the same frontage as single-family housing
- Neighborhood Streets ROW is 28 – 36 feet in width. A general average of 32' in width was used for this analysis
- Sewers, water ,are considered 8" diameter. The storm drainage system is assumed be a combination of traditional and surface water quality systems and costs are estimated using an equivalent per lineal street length. Storm drain lines average 8"to 12" diameter. It is acknowledged that special circumstances will require exceptions. All utilities are within public streets or easements.

**Table 7a: Estimated Development Cost of Streets and Utilities for Multi-Family Residential
Development Streets and Utilities- 33 Acres**

Streets	7.87kL'	Sewer	7.87kL'	Water /L'	7.87kL'	Storm	7.87kL'
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\$370/ L'	2.92	\$190/L'	\$1.49	\$170/L'	\$1.34	\$180L'	\$1.41
Grading, base, paving, sidewalks, etc.		Includes manholes and clean outs, etc.		Includes valving, hydrants etc.		Includes manholes, catch, basins, etc.	

Notes:

- Development tracts range in size from .5 acre to five acres.
- Neighborhood Streets ROW considered to be 32 – 35 feet in width. Widths can vary to 24 feet for special applications and access. Street connectivity is assumed to be in the range of 400' to 800 feet. Alleys are not considered in this analysis.
- Cost of streets serving multi-family development will be higher than SF residential due to intensity of traffic volumes, driveway access, signalization costs of possibility of turn refuges for access
- Typically, eight-inch diameter sewer lines are adequate but in case of high-density housing peak flows may be higher. Costs have been adjusted to reflect this.

Table 7B: Summary Multi-Family Residential Public Facilities Costs (\$Millions

Streets	\$2.92
Sanitary Sewer	1.49
Water	1.23
Storm	\$1.41
Total	\$7.05 Million

Table 8A. Estimated Development Cost of Streets and Utilities for Mixed Use Employment - 130 Acres - \$Millions

Streets Cost	18,480L'	Sewer Cost	18,480L'	Water /L' Cost	18.490 L'	Storm Cost	18,590L'
\$450/ L'	\$8.28	\$190/L'	\$3.5	\$200/L'	\$3.7	\$180L'	\$3.35
(Grading, base, paving, sidewalks, etc.		Includes manholes and clean outs,		.Includes fire hydrants		Includes manholes, catch, basins, etc.	

Notes:

- Variety of lot sizes two to 15 acres that could accommodate single to multiple tenancies/users with full frontage streets. Proposed arterial streets previously identified will account for half of required frontage.
- Heavy industrial uses are not considered, but some freight traffic and warehousing will occur.
- Interior streets will occur associated with development need, but no minimum connectivity is assumed.
- Public access and delivery drives will be provided. Fire lane and emergency access will be responsibility of users

Table 8B: Summary Estimated Development Costs of Streets and Utilities for Mixed Use Employment (Millions \$)

Streets	\$8.28
Sanitary Sewer	\$3.51
Water	\$3.7
Storm	\$3.35
Total	\$18.84

Table 9A: Estimated Development Costs of Streets and Utilities for Mixed Residential - Commercial Employment - 25 acres

Streets Cost	8.5Kl'	Sewer Cost	8.5kL'	Water Cost	8.5kL'	Storm Cost	8.5Kl'
\$450/ L'	\$3.82	\$170/L'	\$1.45	\$200/L'	\$1.7	\$180L'	\$1.530
Grading, base, paving, sidewalks, etc		Includes manholes and clean outs, etc.		Includes valves, fire hydrants.		Includes manholes, catch, basins, etc.	

Table 9B: Summary of Estimated Development Costs of Streets and Utilities for Mixed Use Employment - 25 acres (millions)

Streets	\$3.82
Sanitary Sewer	\$1.45
Water	\$1.7
Storm	\$1.53
Total	\$8.500

Table 10A: Estimated Development Costs of Streets and Utilities for Hospitality District 63 Acre (\$Millions)

Streets Cost	15.75k L'	Sewer Cost	15.75KL'	Water Cost	15.75kL'	Storm Cost	15.7hkL'
\$450/ L'	\$7.01	\$170/L'	\$2.68	\$200/L'	\$3.15	\$180L'	\$2.84
commercial Street Standards		Includes manholes and clean outs, etc.		Includes valving, hydrants. Increased fire flows addressed by 10" lines.		Includes manholes, catch, basins, etc.	

Table10B: Summary Development Costs of Streets and Utilities for Hospitality District
63 Acre (Millions)

Streets	\$7.01
Sanitary Sewer	\$2.68
Water	\$3.15
Storm	\$ 2.84
Total	\$15.68

Neighborhood Commercial – Seven acres

A public facility needs, and cost analysis of proposed Neighborhood Commercial land uses was not done because Neighborhood Commercial land uses as proposed do not typically require public utilities more than single or multi-family land uses. These uses will most likely be located on developed major streets and often adjacent to employment zones. Therefore, it is reasonable to propose that seven acres of neighborhood commercial will most likely utilize existing major roads for access and public facilities and services. Identifying and costing out those facilities would be duplicative.

Other Infrastructure/public Services

Sherwood West will require other kinds of public services in addition to those provided by the city. The Sherwood West Concept Plan proposes that elementary and middle schools will be needed. Per the UGB Concept Plan these uses will require about 40 acres of land - 15 and 20-acres respectively. These schools would also likely draw students from surrounding area.

Schools: The Sherwood West UGB Expansion plan assumes two schools; an elementary and middle school would be required. If 40 % percent of Sherwood West 4,000 + households or 1,600 homes would consistently have children under the age of 18, then each school would need to accommodate 750 students each. This also assumes some enrollment from other areas. The cost of these schools is estimated to \$66.78 million per Tables 11 and 12 below.

Table 11: Sherwood West Elementary School Estimated Costs

Elementary school building cost per sq. foot (2024)	Sq. feet Needed per student	# of estimated students	Costs -\$Millions
\$240	70	750	\$12.60 - Building
Land Acquisition - 15 acres at \$700K developable acre			\$ 10.50 – Land
Site Work - parking grading and utilities and play fields			\$ 2.52 – Site Work
System Development Charges			\$.96 – SDCs
Street frontage Improvements and Utilities			\$.56 – Streets and Utilities
Total			\$27.10

Table 12 Sherwood West Middle School Estimated Costs

Middle school building cost per sq. foot (2024)	Sq. feet Needed per student	# of estimated students	Costs
\$230	100	750	\$17.25 - Building
Land Acquisition - 25 acres at \$700K developable acre			\$17.50 - Land
Site Work - parking grading and utilities and fields			\$ 3.45 – Site Work
System Development Charges			\$.92 – SDCs
Street Frontage Improvements and Utilities			\$.56- Streets and Utilities
Total			\$ 39. 68

Transportation frontage and utilities costs were calculated using \$800 per lineal foot assuming a 700- foot frontage per school. It should be noted that systems development charges might be reduced if these projects are on the major street system. This because SDC credits often are granted if the developer constructs needed improvements. SDCs that are applicable to schools are those levied by City of Sherwood, Clean Water Services and by the Washington County - Transportation Development Tax

Sherwood West Fire Protection and Public Safety Facility: Serious consideration should be given to the need to provide additional fire and life safety services through a dedicated emergency services facility in Sherwood West, should it urbanize. The closest facility is Station 33 at 15440 Oregon St., Sherwood. Currently , it is unlikely for fire and emergency response times to much of the proposed UGB Expansion to meet the National Fire Protection Agency response standards. In addition to safety concerns this could substantively increase fire insurance premiums for much of the area. Table 13 below summarizes the anticipated cost of a new public safety facility in the area.

Table 13: Sherwood West Public Safety Facility Estimated Costs

Building cost per sq. foot (2024)	Building Size	Costs – Millions \$
\$1,000	5,000 sq.	\$5.0
Land Acquisition: Min. 1.5 +/- acre		\$1.0 Land
Site Work - parking grading and utilities and fields		\$.25– Site Work
System Development Charges		\$ Not Specified
Street Frontage Improvements and Utilities		\$ Utilize Existing Streets
Total		\$ 6.25 (Minimum)

Traffic impacts of Sherwood West would significantly impact State Highway 99W. ODOT will significantly control access to Highway 99W. The state’s interest is to ensure the capacity of the Highway is maintained and ultimately a grade separated connection(s) will be required. Planning for Sherwood West has identified either one or two connections will be required. Preliminary cost estimates by the City of Sherwood about is about \$8.6 million for one undercrossing.

Table 14: Summary of “Other” Needed Public Services Cost - Millions

Elementary School	\$27.10
Middle School	\$39.68
Public Safety Facility (Fire Sub-station)	\$ 6.25
State Hwy 99W Crossing	\$ 8.6
Total	\$81.63

High local, county and service district (Clean Water Service) system development charges (SDCs) will have big impacts on the cost of development. The following Tables 15, 16 and 17 are examples of SDC’s that would apply to residential development

Table 15: City of Sherwood, Clean Water Services (CWS) Washington County System Development Charges Applicable Single Family Residential Development (Per Unit) Including Small Lot

Jurisdiction	Water SDCs	Sanitary Sewer	Storm Water/ESU	Parks	Transportation	
Sherwood	\$10,154	\$1,032	\$1,639	\$17,256	\$2,251	\$32,332.00
CWS		\$7,009	\$ 678			\$ 7,687.00
Washington Co.					\$11,478	\$11,478.00

Total	\$10,154	\$8,041.00	\$2,317.00	\$17,256.00	\$13,279	\$51,497.00
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Notes:

- **Water SDC** is calculated using a 5/8" – ¾' Meter. Charges include \$123 per meter inspection fee
- **Sanitary Sewer** is measured in EDU of 150 gallons per day Engineers estimate applies to other uses
- **ESU** is a city defined measurement of impervious of surface.
- **Clean Water Services Regional Connection Fee (RCC)** is collected by Sherwood. The city retains 4% and 96% is remitted to CWS.
- **Storm water quality rates** are set by CWS.
- **Small lot detached single family** (middle housing will be assessed impact fees the same as large lot single family).

Table 16: City of Sherwood, Clean Water Services (CWS) Washington County System Development Charges Applicable to (Town Home) Common-Wall Single Family Housing

Jurisdiction	Water SDCs	Sanitary Sewer	Storm Water/ESU	Parks	Transportation	
Sherwood	\$10,154	\$1,032	\$1,639	17,246	\$1,347	\$31,418.00
CWS		\$7,009	\$ 678			\$ 7,687.00
Washington Co. TDT					\$6,866	\$ 6,866.00
Total	\$10,154	\$8,041.00	\$2,317.00	\$17,256.00	\$8,213	\$45,971.00

Table 17: City of Sherwood, Clean Water Services (CWS) Washington County System Development Charges Applicable to a 50-unit Apartment Building. (SDCs = \$33,623 per unit

Jurisdiction	Water SDCs	Sanitary Sewer	Storm Water/ESU	Parks	Transportation	
Sherwood	\$175,548	\$ 51,624	\$81,950	\$535,300	\$77,400	\$921,822.00
CWS		\$350,450	\$33,900			\$384,350.00
Washington Co. TDT					\$375,000	\$375,000.00
Total	\$175,548.00	\$402,074.00	\$115,850.00	\$535,300.00	\$452,400	\$1,681,172.00

- **Water SDC** is calculated using a 3" Meter. Charges include meter inspection fee
- **Sanitary Sewer** is measured in EDU of 123 gallons per day Engineers estimate applies to other uses
- **ESU** is a city defined measurement of impervious of surface.
- **Clean Water Services Regional Connection Fee (RCC)** is collected by Sherwood. The city retains 4% and 96% is remitted to CWS.
- **Storm water quality rates** are set by CWS.

- **Small lot detached single family (middle housing will be assessed impact fees the same as large lot single family).**

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