MAKING THE GREATEST PLACE

Engagement strategies and community response

Final report
Appendix III: Urban growth report comment index

November 17, 2009

DRAFT URBAN GROWTH REPORT COMMENT INDEX
Fall 2009

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Comment attribution	**Comment summary**	**Metro staff response**
City of Cornelius City of Forest Grove City of North Plains City of Hillsboro City of Banks Johnson-Reid	Metro's cluster forecast is incorrect because it does not include NAICS code 334, which is the code under which solar panel manufacturing would fall.	All NAICS codes, including 334, are included in the Metro forecast. NAICS code 334 is also included in the cluster forecast. The UGR's narrative erroneously states that SolarWorld is in NAICS code 2211, but this text error has no effect on the forecast or the assessment of land need. See Appendix 3 to the UGR for a list of the NAICS codes that are included in each cluster. See Appendix 12 to the UGR for the complete forecast, which includes all sectors.
City of Cornelius City of Forest Grove City of North Plains City of Hillsboro City of Banks Johnson-Reid	The UGR should forecast future land needs for specific industry clusters, including high tech, solar manufacturing, and bio-pharma.	Statewide Planning Goal 14 (Urbanization) requires that Metro ensure capacity for housing and employment. It does not require Metro to supply land with the specific characteristics that may be desired by individual industries or industry clusters. Long-term predictions about the site needs of specific (and emerging) industries are likely to be incorrect. When making specific decisions to expand the UGB, the needs of industry clusters may be considered.
City of Cornelius, City of Forest Grove, City of North Plains, City of Hillsboro, City of Banks, Johnson-Reid, Port of Portland, Portland Business Alliance, Commercial Association of Realtors	The UGR does not adequately incorporate the analysis found in the Hillsboro Draft Economic Opportunities Analysis.	Statewide Planning Goal 9 (Economic Development) requires cities and counties to provide for the specific types of employment needs and opportunities they identify in their Economic Opportunity Analyses (EOA). Goal 9 does not, however, apply to Metro. Oregon Administrative Rule 660-024-0040(5) states that "except for a metropolitan service district [Metro]… the determination of 20-year employment land need for an urban area must comply with applicable requirements of Goal 9…" EOAs often identify specific employment sectors that are the focus of a city's economic development strategy. In EOAs, those priority clusters are sometimes assumed to see additional growth beyond what is indicated in a trend forecast. The UGR, on the other hand, provides an assessment of all

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		employment sectors without identifying priority sectors. Though it may be beneficial to have a regional economic development strategy, Metro has not been charged with the task of developing that strategy and does not presume to have that role. Metro does, however, have a role in coordinating the population and employment forecasts for the region. Adding up the results of individual city forecasts would likely overstate regional growth in some sectors and understate it in others. Metro has some methodological concerns with the Hillsboro Draft Economic Opportunity Analysis (EOA). Primary concerns include: 1) The Hillsboro EOA's forecast treats Metro's older, pre-recession, medium forecast as a low (baseline) forecast. The Hillsboro EOA forecast explicitly rejects the long-term impacts of the current recession on manufacturing sectors. 2) The Hillsboro forecast for NAICS code 334 (computer and electronic product manufacturing), and photovoltaic panel manufacturing, in particular, is so optimistic that it overwhelms the entire seven-county forecast for this sector. Population growth rates as well as the growth rates for other employment sectors have to have some logical consistency and also fit within the context of a national forecast. If the Hillsboro forecast for this sector were correct, it would have serious implications for overall regional growth as well. Factoring in the multiplier impact of the Hillsboro photovoltaic forecast would essentially explode the forecast for manufacturing, which in turn would

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		stimulate growth in nonmanufacturing sectors such as services, retail, finance and other industries. Assuming the multipliers play out as usual, the employment forecast would likely increase from 1.5 percent annual growth (the current Metro forecast) and exceed two percent annual growth. Already, the Metro regional forecast is projected to grow faster than the U.S. average by 75 percent. At above two percent, our region's projected growth would exceed twice the normal rate. In addition, population growth would have to follow suit. Over a 20 year period, greater than two percent population and total employment growth is not realistic or sustainable. It is unlikely that a mature region like Portland metro can grow so much faster over the long-term than the regional, state and national trends depicted by other forecasters. The Hillsboro forecast for photovoltaic panel manufacturing employment is based on the Oregon Department of Energy goal for megawatts of electricity generated from solar panels. This methodology is predicated on the assumption that a significant share of the world's solar panels will be manufactured in Hillsboro. Solar panel manufacturing has entered a phase of standardization and overseas production, where companies will be competing based on low prices and low wages. Ramped up solar panel production in China and a softening of demand in Europe have resulted in a 50 percent drop in solar panel prices over the last year. This same trend has occurred in many other manufacturing sectors and is not expected to reverse itself. The greater degree of specificity found in the Hillsboro forecast, with its effort to make predictions about particular technologies (e.g. solar panels) makes it more likely to be incorrect. When planning for the longer term, policy

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		decisions will be much better served by forecasts that portray generalized aggregates that are tied to national data that have been exposed to continuous scrutiny. The Hillsboro EOA does not provide documentation of the methodologies used to forecast additional growth in the bio-tech and high tech clusters.
City of Cornelius City of Forest Grove City of North Plains City of Hillsboro City of Banks Johnson-Reid	Metro's forecast understates growth in solar manufacturing, bio-pharma, and high tech manufacturing, sectors in which our region has historic strengths.	The Metro forecast is based on data from IHS Global Insight, an internationally respected economic forecasting firm whose data is used by numerous public and private institutions. That data is subsequently adjusted to reflect our region's historic trends and economic strengths. Metro's forecast, in fact, indicates that the region will have a faster rate of growth in manufacturing and, more specifically, electronics manufacturing than the United States as a whole. But, as with the rest of the U.S., it is anticipated that manufacturing will represent a smaller share of total employment in the future. The recent recession is anticipated to have long-lasting effects, particularly on industrial sectors. Metro's forecast model has been peer-reviewed as has the recent Metro forecast (which includes the employment forecast). The peer review panel expressed confidence in the forecast's methodologies and results.
Westside Economic Alliance	Metro's forecast calls for a substantial decrease in manufacturing employment. "The Westside Economic Alliance rejects the premises used to explain these forecasts and challenges Metro to reconsider the implications of this vision."	The Metro seven-county forecast indicates growth in manufacturing employment at both the high and low ends of the forecast range. The forecast indicates that manufacturing will represent a smaller share of future employment. The Metro forecast also indicates that at the high end of the employment range forecast, manufacturing may bounce back faster than the rest of the economy.
Westside Economic Alliance	Metro's forecast is incorrect because it assumes that phenomena such as global warming, rising fuel prices, and a degraded environment will stifle population	Metro's seven-county forecast makes no assumptions about possible catastrophic events. Forecasted population growth rates are the product of large-scale demographic trends. The UGR suggests that rising fuel prices and

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	growth in the seven-county region.	climate change are compelling reasons to consider growth management policies carefully. The use of a range forecast allows for that policy discussion.
Urban Greenspaces Institute	If Climate Change increases the number of floods and wildland fires, temperatures elsewhere in the U. S., especially in the arid regions of the Southwest, is it possible Climate Change "refugees" might increase population projects even more than your current modeling suggests?	Metro staff agrees that there is evidence to suggest that climate change may cause inter-regional migrations, but it is not clear what the degree and direction of these migrations may be. Consequently, Metro's seven-county forecast makes no assumptions about possible catastrophic events. The UGR suggests that rising fuel prices and climate change are compelling reasons to consider growth management policies carefully. The use of a range forecast allows for that policy discussion.
Westside Economic Alliance	The seven-county forecast is wrong because growth rates are lower than at any time since Oregon was granted statehood.	Growth rates are forecasted to decline, but this is because of the mathematics of having an ever larger base (existing) population. When expressed in absolute numbers, the forecast is consistent with previous forecasts, which have proven accurate (see Table 1, attached to the end of this document, for a comparison of an older Metro forecast with actual growth).
City of Cornelius City of Forest Grove City of North Plains City of Hillsboro City of Banks Johnson-Reid	The presence of an existing solar manufacturing cluster in Hillsboro will result in western Washington County capturing the bulk of future high tech and solar manufacturing jobs.	Solar manufacturing firms can be found throughout Oregon, the United States, and the world. Please see Table 2, attached to the end of this document, for a summary of Oregon's recent solar recruits' location choices. Two out of the nine recruits are in Hillsboro (one of those two, SpectraWatt, has since relocated to New York because of public subsidies), while the remaining firms are dispersed throughout the state.
Port of Portland	A job forecast is inadequate for assessing land needs associated with commodity flows (freight, logistics).	This is a comment that Metro received on the preliminary UGR as well. Metro would welcome specific suggestions on how to perform this portion of the assessment differently, but has not received any to date. The UGR's analysis considers land extensive uses with fewer employees. The overall demand model assumptions on employees per square foot by building

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		type have also been revised based on the feedback received on the preliminary analysis. These adjustments should address some concerns about land needs for freight uses.
Port of Portland	Freight facility expansion would likely consume other industrial land, which, in turn, would trigger demand for additional industrial land elsewhere in the region.	Freight-related jobs are included in the regional forecast and demand for capacity that is generated by these jobs is included in the UGR's assessment. Suggestions that a job forecast is not an adequate means of estimating land needs for freight uses have not been accompanied by specific suggestions for an alternative methodology.
Port of Portland	Modify the region's assumed job capture rate to make it more aggressive.	The capture rates (industrial and non-industrial) used by Metro in the UGR are an output of scenario modeling. The policy and investment inputs into that modeling are intended to represent a continuation of current policies and investment trends. If the region is to achieve a higher job capture rate, it would likely need to implement new policies and investments. Expressing a different point of view, we have received comments from Clark County and Vancouver that the assumed capture rate is too high.
City of Cornelius City of Forest Grove City of North Plains City of Hillsboro City of Banks Johnson-Reid	Large, vacant lots are needed in order to attract solar manufacturers to the Portland metropolitan region.	The location choices of several of Oregon's recent solar manufacturing recruits indicate that large, vacant lots are not needed by most firms. Please see Table 2, attached to the end of this document, for a summary of Oregon's recent solar recruits' location choices. Of the nine recent recruits listed, seven are on properties smaller than 25 acres (three of those are on less than 10 acres). Two-thirds of these recent recruits, including SolarWorld, North America's largest solar manufacturer, have located in existing buildings. One firm, SpectraWatt, has left Oregon for New York despite having a vacant 20 acre site (cited reason is because the public subsidies offered were more enticing). The UGR indicates a long-term need for several large lots. The Metro staff recommendation is that we find ways to use our existing inventory of land

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		more efficiently.
Port of Portland, Commercial Real Estate Economic Coalition	Land must be in the right amount and in the right location for the needed purpose.	Statewide Planning Goal 14 (Urbanization) requires that Metro ensure capacity for housing and employment. It does not require Metro to supply land with the specific characteristics that may be desired by individual industries or industry clusters. The purpose of the UGR is to identify any gap in capacity, not to assess how and where to address the gap. Local and regional investments can support efficient utilization of land inside the UGB.
Port of Portland	Much of the region's inventory of industrial land is not ready for development due to substantial constraints including brownfield status, location or lack of infrastructure, and regulatory overlays.	These constraints are taken into account in the UGR. Brownfield sites are assumed to only be available for development in the longer term. Only half of the capacity in recent UGB expansion areas is assumed to be available in the 20-year time frame because of infrastructure shortcomings. Portions of tax lots with environmental constraints are not included in the buildable land inventory. See Tables 27 and 28 on pages 72 and 73 of the UGR for additional information.
Commercial Association of Realtors	The UGR should not assume that public financing will be in place for unknown targeted public investments.	The UGR only assumes those policies and investment trends that currently exist.
Port of Portland	The buildable land inventory does not account for upland habitat protections that reduce capacity for development.	Title 13 (Nature in Neighborhoods) upland habitat protections only apply to future UGB expansion areas. The UGR assesses the current UGB's capacity.
Urban Greenspaces Institute	How many acres of the region's supply of buildable land for employment are urban forest canopy, headwaters areas, and other natural resource lands?	The UGR's buildable land inventory takes into account existing environmental regulations, discounting the inventory where appropriate.
Port of Portland	The lack of development in new urban areas (areas	Past UGB expansions have been made in the types of locations that are

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	brought into the UGB since 1997) is not necessarily because of a lack of infrastructure or governance, but because the land is not suitable for industrial development.	dictated by current State law. Over time, these areas are intended to develop into complete communities, including employment opportunities. It is hoped that the designation of urban reserves will identify sites that are well-suited for development. Metro staff believes that infrastructure and governance must be addressed to make any future UGB expansion areas developable.
City of Tualatin, Commercial Association of Realtors	The UGR should not assume that industrial uses will locate in multi-story buildings.	The UGR's analysis does not assume that industrial uses will locate in multi-story buildings.
Commercial Association of Realtors	The UGR should not assume "ever-increasing" floor-area ratios for all building types with no regard for market feasibility.	Metro staff concurs and asserts that the UGR's assumptions regarding floor-area ratios (FAR) are conservative. No change in FAR is assumed in the short-term and very modest increases (10%) are assumed in the long-term. Assumptions about increases in FARs for industrial uses are particularly modest. The FARs that are assumed in the UGR account for the thresholds at which structured parking becomes necessary.
Commercial Association of Realtors	The refill rates assumed in the UGR do not seem reasonable.	The refill rates assumed in the UGR are the product of modeling that is informed by historic data and professional expertise.

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City of Cornelius, City of Forest Grove, City of North Plains, City of Hillsboro, City of Banks, Johnson-Reid, Port of Portland, Portland Business Alliance, Commercial Real Estate Economic Coalition	Undersupplying land for priority industry clusters would be harmful to the economy.	Metro performs the UGR analysis every five years to ensure a 20-year supply of capacity for jobs. The effect of this is that, in the short-term (five years), there will be four times the needed capacity for jobs. It is extremely unlikely that amount will be insufficient to accommodate growth before the next UGR analysis in five years. This five-year cycle creates a built-in cushion to allow for choices among sites. Experience has shown that the majority of recent solar manufacturing recruits have located in existing buildings and on smaller sites.
Port of Portland	Regional choices related to land supply and transportation will determine the economic future of the region.	Many factors at the global, national, state, regional and local levels have effects on the region's economy. The UGR is not intended to serve as an economic development strategy; it informs land supply decisions that will be made in 2010.
Port of Portland	One of the "six desired outcomes" is economic competitiveness and prosperity—why is there no strategy presented to achieve this outcome or an assessment of how other desired outcomes may conflict with this outcome?	The purpose of the UGR is to identify whether a capacity gap exists and, if so, to what degree. This UGR intentionally presented a variety of policy options to consider for addressing land needs and achieving the region's desired outcomes, but it is not the purpose of the UGR to determine the specifics of those policy options. The viability of those policy options does not have an impact on the capacity analysis. Those policy options can be more thoroughly considered in 2010.
Port of Portland	The UGR and transportation investment strategy need to link up with industry cluster needs. Use the Portland Regional Partners for Business list of clusters instead of the Portland Development Commission's (PDC) list.	Though it may be beneficial to have a regional economic development strategy, Metro has not been charged with the task of developing that strategy and does not presume to have that role. Because there is no agreed upon regional economic development strategy,

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		there is no "right" cluster list to use. The Draft UGR used the PDC list as a way of presenting information in a format that addresses the economic development priorities of many cities in the region. The full forecast, which includes all employment sectors, is the basis for the capacity assessment. The cluster forecast does not figure into the capacity assessment. New cluster definitions will not change the capacity assessment.
City of Portland	The vast majority of our jobs are created through the growth of small businesses. We need to nurture and retain those companies while attracting others.	Metro's analysis indicates that most employment will occur in smaller firms. Attracting larger firms is also of importance to the region's economy.
Port of Portland	Two key elements of the strategy for providing large lot supply (brownfield cleanup and fast process for UGB expansions) will be undefined at the close of public comment on October 15.	The purpose of the UGR is to identify whether a capacity gap exists and, if so, to what degree. This UGR intentionally presented a variety of policy options to consider for addressing land needs, but it is not the purpose of the UGR to determine the specifics of those policy options. The viability of those policy options does not have an impact on the capacity analysis. Those policy options can be more thoroughly considered in late 2009 and in 2010.
Port of Portland, Commercial Real Estate Economic Coalition	Brownfield cleanup should be a priority	Metro concurs that brownfield cleanup should be a regional priority and welcomes partnerships to institute more brownfield cleanup programs. A MPAC subcommittee will be looking at brownfield cleanup as one option to make more of the region's existing industrial capacity available.
City of Portland	The City of Portland is committed to cleaning up, over time, the City's brownfield sites.	The City has a strong brownfields cleanup program and Metro efforts, focused elsewhere in the region, serve as a complement. Metro staff is open to new opportunities to partner with the City of Portland in brownfield cleanup.
City of Portland	The City of Portland is committed to consolidating and assembling adjoining parcels to provide larger sites. Opening up huge tracts of otherwise excellent agricultural land for industry, when we have land with	Metro staff is open to opportunities to partner with the City of Portland in employment land assembly.

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	services already in the UGB, doesn't make sense from a regional investment point of view.	
Port of Portland	A regional infrastructure fund is needed to make industrial sites shovel ready.	Infrastructure funding shortfalls have made it difficult to develop the region's existing supply of land for industrial uses. Metro welcomes a discussion of developing a regional investment strategy, including discussions about possible funding sources.
Portland Business Alliance	There is no reason to expect that funding will be more readily available for refill development than for expansion and to assume otherwise overstates the region's ability to accommodate growth in the existing land supply.	The refill rates that are assumed in the UGR are based on a continuation of existing public investment trends.
Commercial Association of Realtors	The Association appreciates the UGR's improved analytical approach and sensitivity to market realities, but does not believe its estimates or projections. The UGR should make conservative, market-based assumptions.	Metro staff appreciates the input given by the Commercial Association of Realtors that informed some of the UGR's technical assumptions. Metro staff believes that its approach to this analysis is market reality-based.
Commercial Association of Realtors	The UGR should not assume that the market will respond to our policies and investments.	As pointed out by the Commercial Association of Realtors, this UGR has an improved analytical approach that acknowledges market dynamics. The UGR's market assumptions are informed by modeling, historic evidence and the professional expertise of Metro staff, consultants, and private sector representatives.
Commercial Association of Realtors	The UGR should not assume political support for some set of future policy actions	The UGR only assumes those policies and investment trends that currently exist.
Port of Portland Portland Business Alliance	The "fast track" UGB expansion process that has been proposed by some will not be fast enough once planning, annexation, zoning, and infrastructure construction are considered.	An MPAC subcommittee will take up the issue of how to ensure that large lots are available and protected for industrial uses. The fast-track process is one proposal. Metro welcome other proposals.
Johnson-Reid	The draft UGR does not consider lands north of the existing Washington County UGB as candidate	The UGR's purpose is to identify any gap in the capacity of the current urban growth boundary (UGB) to accommodate growth. The UGR is not intended to

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	expansion areas for employment growth, modeling, and employment land capacity study.	examine how or where to fill a capacity gap outside of the current UGB. Scenario modeling was used to inform the UGR. Those scenarios assume a continuation of current policies and investment trends and, as such, assume that future UGB expansions will follow the existing hierarchy of lands as defined by State law. When urban and rural reserve designations are made, scenario assumptions about future UGB expansions will be adjusted.
Port of Portland	Habitat protection programs at the regional and local levels reduce the efficiency with which land is used inside the UGB.	Habitat protection and provision of parks and open spaces are key components of the 2040 Growth Concept. Balancing these goals with efficient development of land is often challenging and Metro is always looking for new ways of doing so.
Port of Portland	The UGR implies that there has been a problem of industrial land conversion and that there is a need to revise Title 4 of the Urban Growth Management Functional Plan. Title 4 provides adequate protection. If there are conversions from industrial uses, it is an enforcement issue.	Metro staff hopes to compile more information to determine whether industrial land conversion has been occurring and, if so, why. An MPAC subcommittee will take up the issue of how to ensure that large lots are available and protected for industrial uses.
Commercial Association of Realtors, Citizen comments (less than five)	Expand the UGB	The decision about whether or not to expand the UGB will be made by the Metro Council, in consultation with MPAC, in 2010. That decision will be based on the UGR's analysis and any new policies or public investments that are adopted by the end of 2010 that affect the region's capacity.
Citizen comments (approximately 100)	Focus growth inside the existing UGB	The decision about whether or not to expand the UGB will be made by the Metro Council, in consultation with MPAC, in 2010. That decision will be based on the UGR's analysis and any new policies or public investments that are adopted by the end of 2010 that affect the region's capacity.
Port of Portland, Portland Business Alliance, Commercial	30 days is not an adequate amount of time for public review and comment on the UGR	Metro must meet a State-mandated deadline (end of 2009) for the Metro Council's acceptance of the UGR. The public will be able to comment throughout most of 2010 on the various policy choices that will be considered for closing any capacity gap identified in the UGR.

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Association of Realtors		Metro staff appreciates the time commitment that various advisory committees have made in providing review of the UGR. Metro has been working with advisory committees to refine the approach and contents of the UGR since winter of 2008. A preliminary UGR was released in May 2009 in order to proactively solicit and respond to technical comments. To the extent possible, comments received on the preliminary UGR have been addressed in the draft UGR. Please see Appendix 1 to the Draft UGR for a summary of comments received and draft Metro staff responses.

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City of Portland	Future trends such as higher energy costs, carbon taxes or regulations, and changing demographics make Portland well-positioned to provide future residents with the kinds of housing choices that they will desire. Portland has the ability to accommodate 140,000 more households without any changes to zoning.	The UGR's analysis indicates that the City of Portland and the region have ample zoned capacity to accommodate the next 20 years of residential growth. The UGR shows a need to attract the residential market to that zoned capacity. Policies and investments that encourage redevelopment and infill in centers and corridors should remain the region's focus. The trends cited by the City may attract more of the forecasted households to existing urban areas than contemplated by the UGR.
Home Builders Association of Metropolitan Portland	How does Metro plan on achieving refill rates of 50 percent?	The draft UGR assumes a 33 percent refill rate, which is in keeping with historic rates and, according to Metro's market-based economic model, is likely to be achieved under current zoning.
City of Tualatin Portland Business Alliance	A 33 percent refill rate may not be a reasonable expectation.	The draft UGR assumes a 33 percent refill rate, which is in keeping with historic rates and, according to Metro's market-based economic model, is likely to be achieved under current zoning.
City of Tualatin	Where is the analysis that indicates where refill will be occurring?	Refill rates are expected to vary from city to city, with generally higher rates in Portland than in outlying communities. Please see Maps 1-4, attached to the end of this summary, which show historic and forecasted refill rates throughout the region for single-family and multi-family residential development.
Home Builders Association of Metropolitan Portland	Lands that are likely spots ("low-hanging fruit") for refill have already seen refill occur.	Redevelopment and infill (redevelopment in particular) are ongoing market phenomena. There are many underutilized sites throughout the region that remain ripe for redevelopment and new opportunities will continue to emerge over time.
Home Builders Association of Metropolitan Portland	How does Metro anticipate having 71,000 housing units subsidized to the tune of up to $50,000 per home and what will the impact be on schools and other public services if urban renewal districts are	The Home Builders Association is referring to scenario assumptions in its comment. For the purpose of scenario modeling, Metro assumed a continuation of existing investment trends. The residential incentive assumptions that Metro made were reviewed by cities, counties, the Portland

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	used to created these subsidies and pull money away from other public services?	Development Commission, and the Metro Technical Advisory Committee. There are no assumptions made about new levels of investment. Better performance may be achieved with additional investments, investments in different locations, or simply with additional time. It is not the role of the UGR to determine the possible impact on schools and other public services if cities continue their urban renewal programs.
Home Builders Association of Metropolitan Portland, Western Advocates, Inc.	The assumption about future park needs that is made in the UGR capacity calculation is incorrect. Cities and park providers have more financial resources today than they did in 2002 (year of previous UGR) to purchase park land.	There is no specific guidance in state planning law, from ORS 197.296 or Goal 8 on Recreational Needs, on methods to determine park needs. There is no perfect way of estimating future park needs since there is no regional level of service standard for parks. Until directed otherwise, Metro does not presume to have the role of setting a regional level of service standard for parks. The methodology used in the Draft UGR is the same methodology that was used in the 2002 UGR, which was on the advice of the Metro Policy Advisory Committee. That methodology is based on fiscal capacity to purchase park lands for active uses. Metro staff has gathered current information about system development charges collected throughout the region. Though some jurisdictions have increased their system development charge rates, land prices have also increased, resulting in no appreciable change in park purchasing power. The acres of parks and open space cited in the Regional Infrastructure Analysis include natural areas and other non-active use spaces. The UGR's parks calculation is only intended to estimate the land need for active-use parks (i.e. not natural areas) since these are lands that could otherwise be buildable for residential purposes. The buildable land inventory takes into account vacant lands that are not buildable because of regulatory protections (Titles 3 and 13 of the Urban Growth Management Functional Plan).

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		The effect of increasing the acres assumed for future parks in the UGR would be to increase the need for UGB expansions. Such expansions would not guarantee that parks are provided where population growth is occurring. Many existing urban areas will likely witness population growth, but will not necessarily have the option of purchasing additional park space. As an example, the Tualatin Hills Parks and Recreation District is contemplating reducing its goal for level of service (park acres per 1000 people) in urbanized areas.
Legal Aid Services of Oregon (Hillsboro Regional Office), Tom Cusack	Revise the table appearing on page 21 of Appendix 8 (needed housing data tables) to more accurately show the need for subsidies at higher rent levels than the less-than-$400 rent level currently shown.	Metro staff appreciates the careful review of the data and agrees that additional rent and ownership price categories should be denoted as "partially assisted." All categories of rental housing below $1,100 in rent and owner-occupied housing that is $200,000 or less in value may need government assistance. Corrections to tables 303.1a and 303.1b in Appendix 8 will be made in the final UGR.
Tom Cusack	Metro should review existing reports, Census data, and the American Community Survey data to determine the relative rate of Portland Metro housing mismatch by income and rent levels and adjust their demand/supply projections accordingly.	The UGR's method and the method proposed by Mr. Cusack are both valid approaches, but are suitable for different purposes. The method proposed by Mr. Cusack would provide an assessment of current conditions, but would not depict the housing production that is likely to occur in the next 20 years as required for the UGR. To get a sense of the mismatch referenced by Mr. Cusack, the housing needs analysis scenarios forecast future housing production and the number of future cost-burdened households (renters paying more than 50 percent of their income for housing and transportation). The UGR's approach acknowledges the fact that higher income households cannot be prevented from occupying market rate housing that is cheaper than what they could potentially afford.
Legal Aide Services of	The report fails to mention and account for the impact	As pointed out in the comment, the analysis doesn't indicate what a

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Oregon (Hillsboro Regional Office)	of units otherwise affordable to lower income households being occupied by higher income households.	household should pay (given their income), just what they do pay. This approach acknowledges that, rather than being static, housing prices are a product of market demand. This analytical approach is true to the dynamic faced by low income households in today's market. Without a housing quota system that sets aside housing for different income levels, this is also how future housing markets are expected to function. To assess affordability, the analysis provides information about the share of income spent on housing and transportation. For some households, this share is relatively small and for others it is substantial. It remains for policy discussion what can be done to improve these outcomes.
Legal Aid Services of Oregon (Hillsboro Regional Office), Tom Cusack	Add a narrative discussion and table that shows the relevant need for government housing including housing that receives public assistance.	Metro staff will add narrative to better describe affordable housing needs. The analysis indicates how many households (by rent or home price) may need government assistance. However, the question of how many households should receive government assistance is a policy matter that is open to interpretation. The UGR provides several analyses that can inform that discussion: Tables 303.1a and 303.1b, found in Appendix 8, provide the number of new, renter-occupied and owner-occupied dwelling units by rent or value range. In most rent ranges, there would appear to be a need for some amount of government assistance. This determination would also depend on wage levels. Tables 303.2a and 3032.b, found in Appendix 8, provide the number of renter-occupied dwelling units where the occupant is spending more than 50 percent of their income on transportation and housing. The UGR deems these households to be cost-burdened. The UGR further asserts that costs to these

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		households may be reduced through a number of mechanisms including, but not limited to, subsidies. Other mechanisms include transit investments and changes to local zoning codes to allow a greater diversity of housing types and sizes.
Legal Aid Services of Oregon (Hillsboro Regional Office)	Households with children, not seniors, will represent the majority of low income renters.	In trying to make the report more readable, Appendix 7 blends owners and renters. As a consequence, the low income renters with children household type is perhaps not as visible in the report as it could be. Household type two for renters has the same low income as household type one but is younger and has a larger household with a much greater chance of children being present. This household type has a higher propensity to consume renter single family homes and to travel much further than renter household type one. As noted in the comment, they consume a larger house or apartment than do seniors. As a consequence their cost burden is substantially higher (15 – 30%) than household type one.

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City of Lake Oswego	The City supports the UGR's analysis and is committed to helping expand capacity in the Foothills area of Lake Oswego to create a dense, new transit-oriented neighborhood.	Metro looks forward to working with Lake Oswego and other cities to identify how to regional and local actions can be coordinated to achieve local aspirations that are supportive of the 2040 Growth Concept.
Home Builders Association of Metropolitan Portland	The public will not accept higher densities.	The UGR analysis does not assume any change to current zoning, so the UGR does not assume higher zoned densities in existing neighborhoods. The 2040 Growth Concept calls for focusing growth in centers and corridors as directed by the region's citizens.
City of Wilsonville Coalition for a Livable Future	Infill and redevelopment in centers and corridors are generally preferable and more efficient that outward expansion. Infill and redevelopment protect natural resources. There is no money for infrastructure in UGB expansion areas. Infill and redevelopment can help to fund the maintenance of existing infrastructure. Infill and redevelopment will be necessary to reduce carbon emissions.	Infill and redevelopment are key market responses that the 2040 Growth Concept calls for in centers and corridors.
League of Women Voters of Portland	Compact urban form and the integration of land use and transportation will be essential for addressing climate change and providing equity of opportunity. Areas around transit centers and light rail stations, such as Lents and Gateway offer great potential and deserve attention in the investment strategy.	Metro staff concurs.
Home Builders Association of Metropolitan Portland	Policies that push more households to live outside the Metro UGB do not mesh with Metro's goals for sustainability.	Metro staff concurs that there are negative implications of having more people choose to live in neighboring cities and commuting back to the Metro region. The draft UGR identifies a residential capacity gap. There are multiple ways to fill that gap that will be discussed in 2010.
Urban Greenspaces Institute	The urban forest canopy, headwaters areas, and upland habitat must receive heightened protection if the region is to pursue infill and redevelopment. Title	In determining the region's capacity for growth, the UGR must only assume regulations that are currently in place.

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	13 is insufficient protection.	
League of Women Voters of Portland	The League supports the diversification of the region's housing stock, by type and price.	Metro staff concurs that additional housing options are needed in the region in order to reduce the number and share of households that are cost-burdened.
Oregon Opportunity Network, Housing Land Advocates, AARP, Legal Aid Services of Oregon (Hillsboro Regional Office)	Housing and transportation affordability must be considered in growth management and investment decisions. Transit-Oriented Development should be promoted.	Metro staff concurs and notes that the UGR analysis finds that many of the region's existing centers and corridors offer the most affordable housing and transportation options. Yet, an affordability problem is likely to persist and perhaps worsen with a continuation of current policies and investment trends. Growth management policies and transportation investments alone will not, however, solve the affordability problem.
Legal Aid Services of Oregon (Hillsboro Regional Office)	Set concrete, regional goals, objectives and performance measures for housing affordability. Go beyond voluntary measures as they have not resulted in local jurisdictions making affordable housing a priority.	Metro staff appreciates this input. These tasks do not, however, fall under the purview of the UGR.
Home Builders Association of Metropolitan Portland	30 days is not an adequate amount of time for public review and comment on the UGR	The public will be able to comment throughout most of 2010 on the various policy choices that will be considered for closing any capacity gap identified in the UGR. Metro staff appreciates the time commitment that various advisory committees have made in providing review of the UGR. Metro has been working with advisory committees to refine the approach and contents of the UGR since winter of 2009. A preliminary UGR was released in May 2009 in order to proactively solicit and respond to technical comments. To the extent possible, comments received on the preliminary UGR have been addressed in the draft UGR. Please see Appendix 1 to the Draft UGR for a summary of comments received and draft Metro staff responses.

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		Metro continues to try to give review and comment opportunities, but must meet a State-mandated deadline (end of 2009) for the Metro Council's acceptance of the UGR.
Citizen comments (less than five)	Expand the UGB	The decision about whether or not to expand the UGB will be made by the Metro Council, in consultation with MPAC, in 2010. That decision will be based on the UGR's analysis and any new policies or public investments that are adopted by the end of 2010 that affect the region's capacity.
Citizen comments (approximately 100), Southwest Neighborhoods, Inc.	Focus growth inside the existing UGB	The decision about whether or not to expand the UGB will be made by the Metro Council, in consultation with MPAC, in 2010. That decision will be based on the UGR's analysis and any new policies or public investments that are adopted by the end of 2010 that affect the region's capacity.

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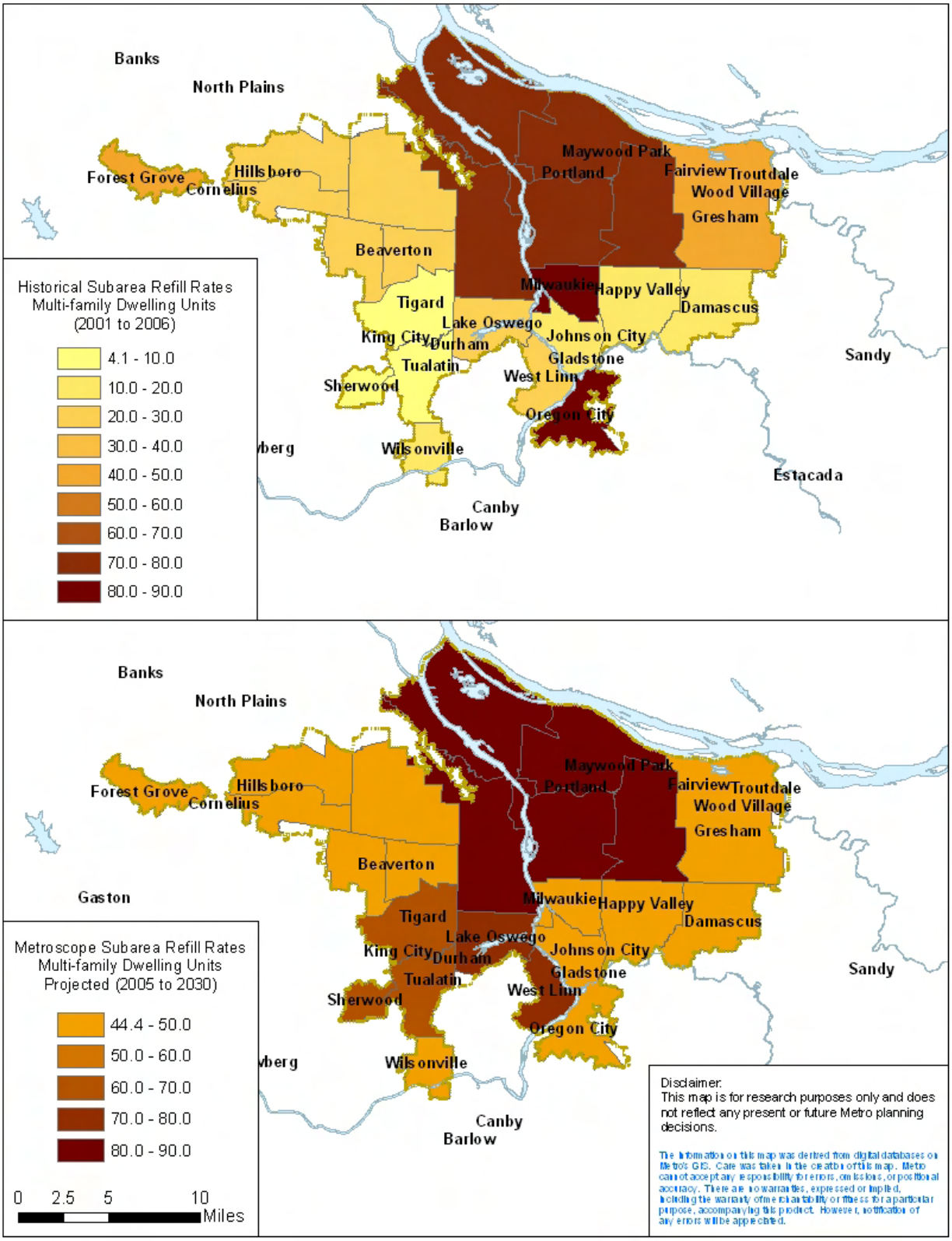
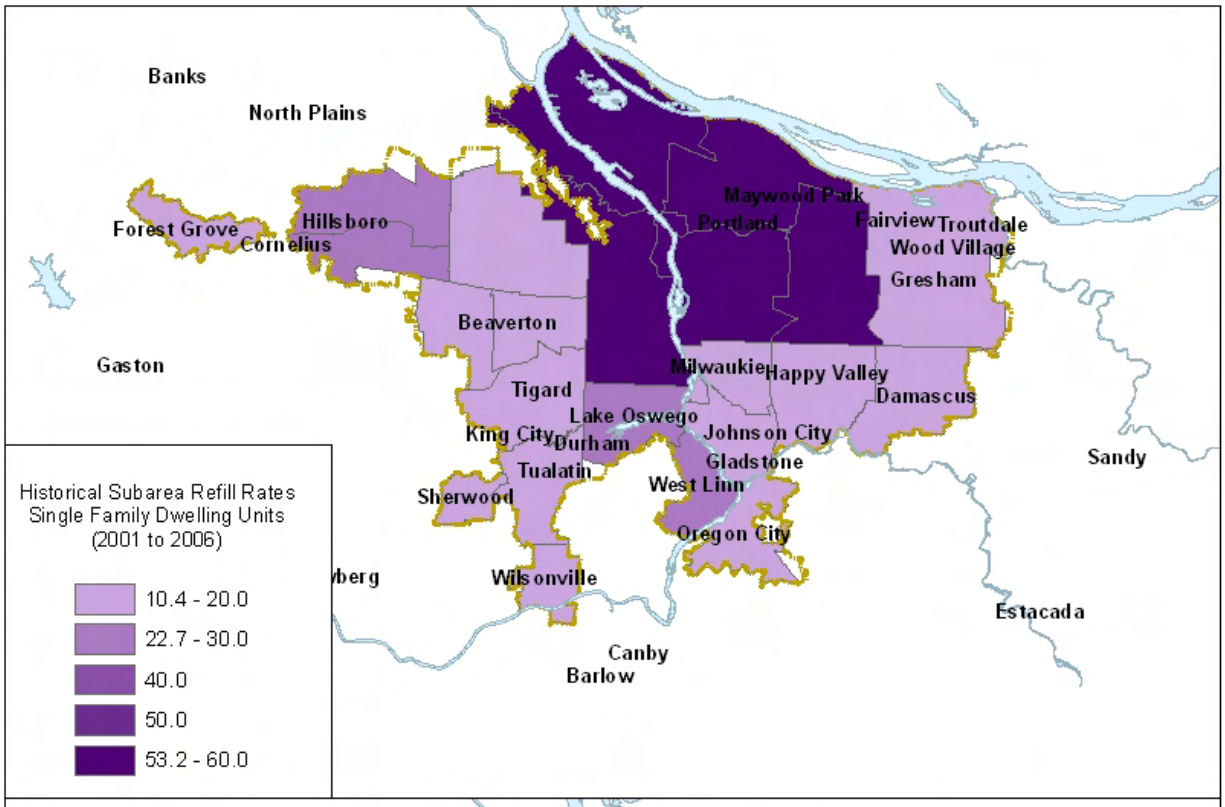
Maps 1 through 4:

Multi-family residential refill rates (historical and forecasted)



Single-family residential refill rates (historic and forecasted)



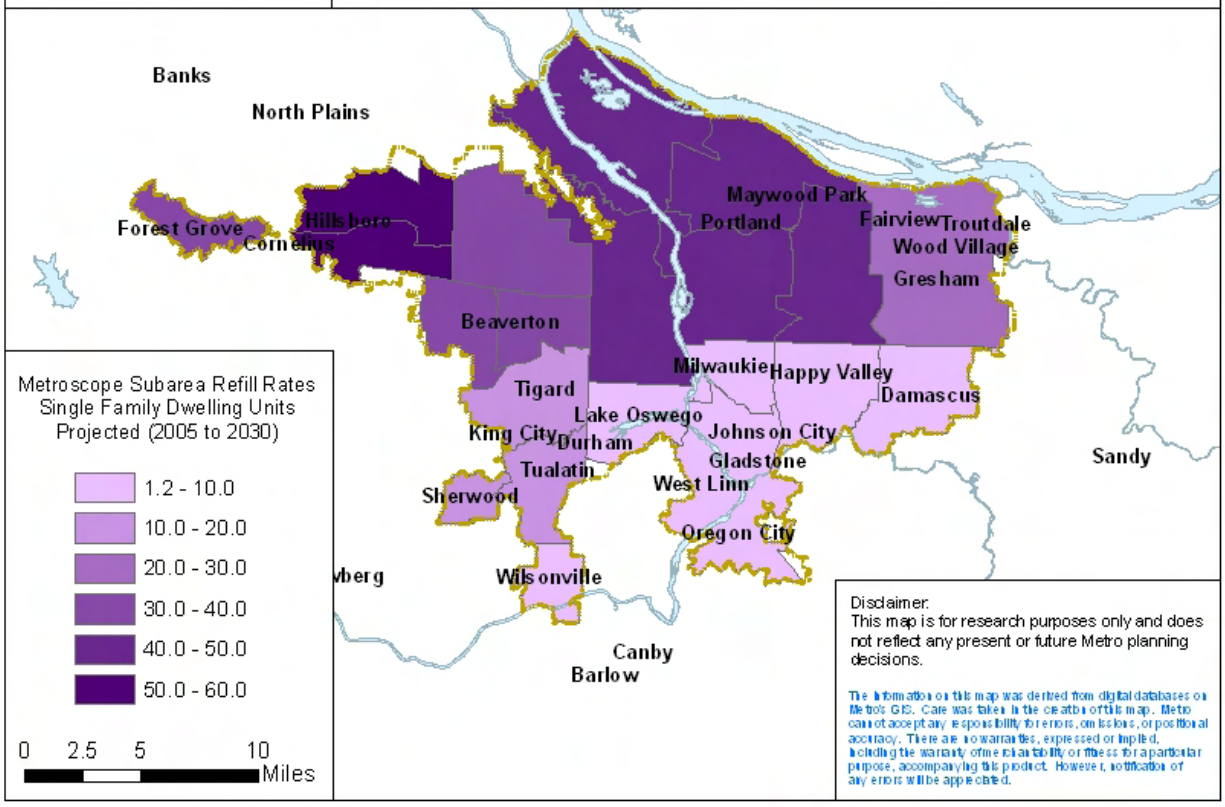


Table 1: Regional Forecast Comparison: History and 2000 UGR Forecast

Population - Portland Region (5 counties)

	Forecast	History	Difference	% Difference	commentary
2000	1,874,450	1,874,450	0	0.0%	forecast base year was 2000 Census
2001	1,902,500	1,922,984	-20,484	-1.1%	recession clouds pessimism in forecast outlook --> underforecast population growth
2002	1,934,340	1,958,976	-24,636	-1.3%	
2003	1,963,690	1,983,367	-19,677	-1.0%	
2004	2,007,710	2,003,354	4,356	0.2%	jobless recovery dampens regional up turn
2005	2,049,190	2,035,565	13,625	0.7%	
2006	2,090,960	2,075,034	15,926	0.8%	
2007	2,132,750	2,115,394	17,356	0.8%	
2008	2,170,100	2,147,260	22,840	1.1%	unforeseen recession taints trend forecast --> over forecast population growth
2009	2,203,000	2,158,115	44,885	2.1%	as steep drop in housing prices and economy depresses in-migration flows

Sources: Metro Regional Forecast: 2000-2030, Sept. 2002; U.S. Census Bureau; PSU; OFM

Employment - Portland Region (5 counties)

	Forecast	History	Difference	% Difference	commentary
2000	958,010	960,910	-2,900	-0.3%	forecast base year was 2000 BLS jobs
2001	954,750	953,750	1,000	0.1%	job growth stalls as recession hits the region
2002	951,300	932,260	19,040	2.0%	recession grips regional economy over a longer and deeper duration
2003	976,480	922,520	53,960	5.8%	--> over forecast growth during this down-cycle
2004	1,009,280	941,930	67,350	7.2%	
2005	1,043,510	971,190	72,320	7.4%	"jobless" recovery begins adding to a jobs recovery as real estate & finance bubble
2006	1,068,030	1,002,487	65,543	6.5%	spurs economic growth across the nation as growth inches towards pre-recession
2007	1,090,440	1,021,862	68,578	6.7%	growth trend
2008	1,120,200	1,022,319	97,881	9.6%	recession hits again --> over forecast jobs as growth again cycles deeper below
2009	1,144,900	N.A.			expected pre-recession employment trends

sources: Metro Regional Forecast: 2000-2030, Sept. 2000; U.S. Bureau of Labor Statistics and Oregon State Employment Division

5 counties = Multnomah, Clackamas, Washington, Yamhill and Clark

Table 2: Site choices of solar manufacturing firms in Oregon

Company	City	Acres	Using existing building?	Notes
PV Powered	Bend	9	Undetermined (appears yes)	Company founded in Bend. 100,000 square feet of building on former Oregon Woodworking site. Manufactures power inverters.
Solaicx	Portland	21	yes	
SolarWorld	Hillsboro	94	yes	Company in final stages of expansion at Hillsboro site. Moved into existing Komatsu silicon wafer facility.
Peak Sun Silicon	Millersburg	8	no	Company has option to purchase an additional 90 acres in Millersburg
XsunX	Wood Village	8.28	yes	Company first chose Oregon as a location and then began a site selection process, looking for existing buildings. The building that XsunX leases previously housed Merix, a high-tech manufacturer.
SpectraWatt	Hillsboro	20	no	Intel spinoff on Intel campus (has 20 acres). Halted construction because of a lack of investment money. Moved to New York because of public incentives.
Sanyo	Salem	20	no	
Oregon Crystal Technologies	Gresham	Less than 1	yes	In Rockwood urban renewal area – deciding between 2 existing buildings
Uni-Chem	Eugene	200	yes	Locating in old Hynix semiconductor factory, which is 1,000,000 square

				feet. Remainder of property is vacant.