

# Coalition *for a* Prosperous Region

Clackamas County  
Business Alliance

Columbia Corridor  
Association

Commercial  
Association of Brokers

NAIOP Oregon  
Chapter

Home Builders  
Association of  
Metropolitan Portland

Portland Metropolitan  
Association of  
Realtors ®

Portland Business  
Alliance

Westside Economic  
Alliance

December 3, 2014

The Honorable Tom Hughes  
Metro Council President  
600 NE Grand Ave.  
Portland, OR 97232

Dear Chair Hughes and Members of the Metro Council,

On behalf of the members of Coalition for a Prosperous Region ("CPR"), please accept these comments on the Draft Urban Growth Report ("UGR"). Members of the CPR value the positive collaborative relationship enjoyed with Metro in the past and are sending this letter in the spirit of that relationship

CPR Members are extremely concerned that the Draft Urban Growth Report, released by Metro in September, does not reflect either the findings of Metro's own Housing Preference Study, historic housing trends in our region, or comply with ORS 197.296(5). Metro's Housing Preference Study found that 80% of respondents preferred a single family detached home. While that was part of the open-ended response part of the study, the actual forced choice analysis in the Study demonstrated that, to a large degree, people will make decisions reflecting their preferences even when faced with trade-offs. In addition, single family homes have historically made-up 60% of the housing units built in our region.

Metro's projection that only 37% of housing units built over the next twenty years will be single family is a dramatic departure from both buyer preference and historic data and ignores the individual culture and lifestyle of the 24 cities throughout the region. The development trends of the last two to five years, which were largely a result of the historic housing recession we were in or coming out of during that time, need to be weighed in that context. Additionally, the projection fails to recognize the potential inability of municipalities to accommodate such high density housing in the quantity and price ranges projected.

**CPR members ask that Metro use Metroscope to provide alternative planning scenarios in order to determine how much, if any, UGB expansion would be necessary if the single/multifamily assumptions were set at 50/50 and 60/40, respectively. This data would give Metro and others the information needed in order to determine how planning for growth could impact the region.**

Members are also concerned that the cost of the infrastructure that will be necessary within existing jurisdictions has not been measured, nor that the capacity levels and market demand in the various Metro cities has been adequately examined to guide where future growth will occur.

**CPR members ask that Metro's auditor measure whether the cities where the growth is projected have the infrastructure capacity to handle the growth and what the cost of that growth will be in those jurisdictions. Additionally, CPR members ask that Metro's auditor determine whether the housing growth contemplated reflects market demand or reality, and will be tenable to the impacted neighborhoods. There is a well-**

documented increase in neighborhood opposition to urban infill, across all spectrums. Infill at the level contemplated in the UGR will dramatically change the character of many existing Portland neighborhoods in ways that might not be palatable to people currently living in them. Indeed, neighborhood opposition has not been limited to the City of Portland. There are recent, and high profile, examples of opposition in the cities of Lake Oswego, Gresham, Forest Grove and Milwaukie that is reducing, delaying or increasing the cost of proposed development. In fact, a preference for retaining the character of existing neighborhoods, and opposing dense urbanization, seems to cross both geographic and socioeconomic lines.

We are also concerned that the forecast range for additional jobs, between 120,500 to 648,500 new jobs in the Portland/Vancouver metro area by 2035, is too wide, with the low end being insufficient for a prosperous regional economy. We are troubled that the UGR does not adequately distinguish future demand for large industrial sites that are 25 acres or more, particularly the market readiness of those sites, which have been shown in the 2014 Industrial Lands Inventory Update to be extremely limited.

It is critical that we ensure the region's competitiveness, and it is unquestionable that having adequate land availability is a key factor in adding middle income jobs. Without sufficient large industrial sites of 25 acres or more to support job creation at all income levels, we will not be able to adequately compete with other regions to attract and retain quality jobs.

Industrial lands generate a significant amount of the region's middle-income jobs, particularly for those that do not have a four-year college degree. These jobs are necessary to achieve regional equity. **At a minimum, the 2014 Industrial Lands Inventory Update should be included as an appendix to the UGR and Metro should use subsequent Industrial Lands Updates to inform future UGR updates.**

**Finally, members ask that Metro coordinate with TriMet in order to determine whether TriMet has the capacity to serve the projected areas, and what the cost of the increased capacity will be.** Transportation options, as well as commute times, have a substantial impact on livability as well as carbon emissions.

In addition to asking Metro to gather additional data and perform further reviews, **CPR asks that the Metro Council commit to addressing the inadequacies, omissions and concerns expressed by us and others and then modify the draft UGR to show how those issues are addressed before it is made final next year. We also recommend that a finding be made which states that impacted cities and agencies must confirm that their plans and capabilities align with the draft UGR before it is made final next year.**

Thank you for considering our concerns and requests.

Sincerely,

A handwritten signature in black ink, appearing to read 'Drake Butch', with a stylized flourish at the end.

Drake Butch  
Chair  
Coalition for a Prosperous Region