

March 11, 2024

Barbara Fryer, Community Development Department Director
City of Cornelius
1355 North Barlow Street
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Director Fryer:

Thank you for providing Metro with notice of the draft proposed City of Cornelius 2024 Economic Opportunities Analysis (EOA), with Case File No. CPA-01-24.

Metro's Regional Framework Plan (RFP) includes policies to protect our state's valuable natural resource lands, provide longer-term certainty to property owners of where future development will occur, limit transportation costs, and promote efficiency in urban development with a compact urban form.

These policies are advanced in part by encouraging the focused use of vacant and underutilized lands already in the urban growth boundary (UGB). They are further advanced by elimination of unnecessary barriers to compact, mixed-use, pedestrian- and bicycle-friendly and transit-supportive development, particularly in town centers, and the protection of rural reserves from urbanization.

Metro therefore supports many of the "core initiatives" recommended in the draft EOA, including those that would:

- Establish a detailed inventory of properties already in the UGB that are available and readily (re)developable for employment uses;
- Encourage infill, redevelopment, and/or adaptive reuse of underused properties;
- Limit the use of employment lands by those uses with less economic benefit;
- Increase the mixture of available housing types and support affordable housing development to benefit the local workforce;
- Promote walkability and higher-density, mixed-use, transit-oriented development in the City's town center;
- Study anti-displacement methods to protect existing small businesses;
- Streamline review processes and limit costs for employment-related development applications;
- Facilitate clean up and utilization of brownfield sites; and
- Promote the preservation of agricultural enterprises in the surrounding rural area.

RFP policies also recognize that each of Metro's cities and counties participate in a shared regional economy, wherein the actions of one partner jurisdiction can impact quality of life and economic vitality in another. Metro continues to promote collaborative, regional approaches to assessing and addressing economic needs and the use of our regional growth forecasts.

The draft EOA's employment land need forecast relies on an "alternative growth scenario" that assumes a desired 1:1 balance of jobs to local workers in 20 years, a major rebalancing from the current ratio. However, the draft does not yet provide a clear rationale for why the assumed local economic growth in this outcome-driven forecast is necessarily more likely to be achieved than the growth forecasted by Metro, or by the Oregon Employment Department (OED). Metro may have more modest growth projections than another analysis, but that doesn't mean Metro's forecasts are less reliable. Historically, Metro's growth projections have had a high degree of accuracy and, as acknowledged in the draft EOA, are a formally accepted "safe harbor" for forecasting.

The EOA could also benefit from further detailing which commercial and industrial properties already in the UGB are considered not suitable for future employment uses and why. For example, the amount of existing commercial and industrial lands that will be needed for new roads and utilities could be identified and justified, and an explanation could be provided for why future employment-related development cannot occur on slopes of 10%. Each property excluded from the buildable lands inventory due to constraints, and the reasoning for their exclusion, could be clearly listed.

We applaud the City's efforts to identify how greater economic opportunities can be created in Cornelius that are consistent with regional land use priorities and current trends.

Regards,



Glen Hamburg
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