

---

## DENSITY AT ANY COST, REVISITED

---

GERARD C. S. MILDNER

Academic Director, Center for Real Estate, Portland State University

In the November issue of the *Center for Real Estate Quarterly Report*, I published an article that expressed concern about the draft Urban Growth Report that Metro was considering. The article generated a flurry of comments, including a number of widely circulated emails, several articles in the *Portland Tribune*, an opinion editorial by Andre Baugh and Katherine Schultz, the chair and vice chair of the City of Portland's Planning and Sustainability Commission. In addition, Metro staff John R. Williams (Deputy Planning Director) and Molly Vogt (Interim Research Center Director) prepared an official response, listing what they characterized as 10 "serious problems" the information and conclusions presented in my earlier article. Metro staff's response was posted on the Metro website and distributed to the Metro Council on the night of the Council vote and is included as an appendix to this article.

On Thursday, December 4, the Metro Council held a hearing and approved the draft Urban Growth Report. The UGR received comments from environmental activists and urban planners arguing in favor, and letters of concern from the Portland Home Builders, suburban mayors, and leaders of various Portland business and real estate organizations. Personally, I'm glad the Council voted to approve the Report.

■ **Gerard Mildner, Ph.D.** is an associate professor of real estate finance and the academic director of the Center for Real Estate at Portland State University. Dr. Mildner has an undergraduate degree from the University of Chicago and a Ph.D. in economics from New York University. His research is focused on land use regulation, growth managements, rent control, urban transportation and the economics of local government. Any errors or omissions are the author's responsibility. Any opinions expressed are those of the author solely and do not represent the opinions of any other person or entity.

Using its MetroScope model, the Report documents the fundamental tradeoff between minimizing the expansion of the Urban Growth Boundary and housing costs. Continuing with Metro's "Region 2040 Plan" will lead to dramatic increases in housing rents and significant losses in the wellbeing of Portland residents. The remainder of this article explains why this is the likely outcome while addressing the issues identified in the Metro staff letter.

## **METROSCOPE ACCOUNTS FOR HOUSING PREFERENCES.**

Williams and Vogt argue that MetroScope incorporates housing preferences and they cite my participation in a 2008 review panel as an endorsement of the model.<sup>1</sup> However, demographic projections are established at the beginning of the planning process, including how much of the regional population growth will be accommodated outside the Portland UGB, known as the capture rate. Demography is a sophisticated social science that makes projections based upon past trends and current policy. However, the Metro policy of zero expansion of the UGB is unprecedented and difficult for federal and local demographers to model. As a result, consumers and businesses in the MetroScope model don't have the freedom to pick San Francisco, Denver, Houston, or Atlanta inside the MetroScope model, much less Estacada, Salem, or Battleground, should Portland housing costs explode.

In fact, I co-authored a report in 1996 that encouraged Metro to develop a more sophisticated economic and land use planning model, which led to the development of MetroScope.<sup>2</sup> One of our points at the time was that Metro needs to apply more sensitivity analysis to its planning assumptions and to its demographic assumptions and create feedback loops between housing consumer preferences, location decisions, and buildable capacity of the region (see the diagram that report on the following page).

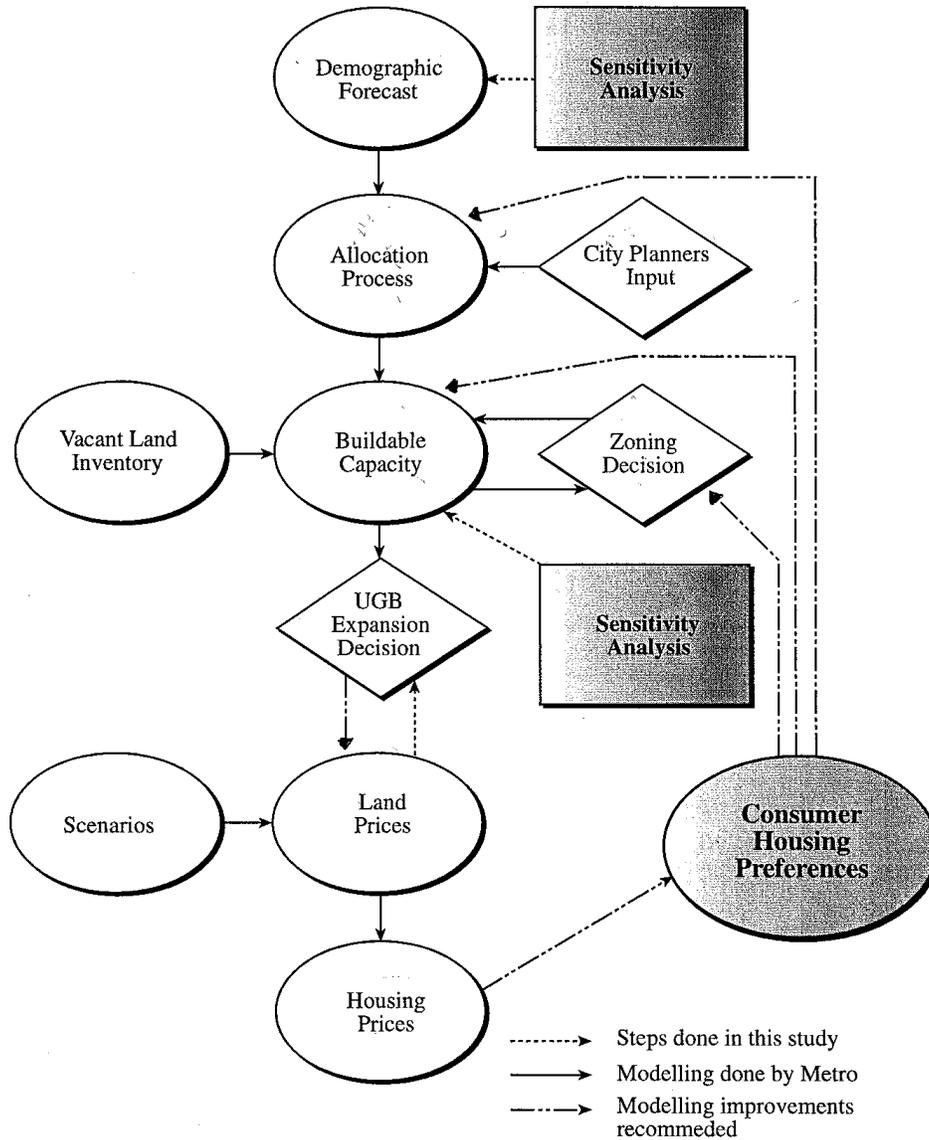
At the time, my co-authors and I were concerned that the increases in home prices and rents would steer more development activity towards the exurban communities in Oregon (Canby, North Plains, Newberg, McMinneville), as well as suburban Clark County, Washington. We were also concerned about the decision to focus future urban growth boundary expansion locations on Clackamas County, where housing demand was (and is) weak, rather than Washington County, where demand was (and is) much higher, would not lead to efficient outcomes. Sixteen years after the unproductive UGB expansion in Damascus, this seems like good advice not taken. And we were very much concerned whether Metro could force jurisdictions to change their zoning to raise neighborhood density.

---

<sup>1</sup> George C. Hough, Jr., Sheila A. Martin, Gerard C.S. Mildner, Risa S. Proehl, 2008. "Housing Needs Study for the Portland Metropolitan Area: Final Report," Portland State University, Institute of Portland Metropolitan Studies.

<sup>2</sup> Gerard C.S. Mildner, Kenneth J. Dueker, and Anthony M. Rufolo, 1996. "Impact of the Urban Growth Boundary on Metropolitan Housing Markets," Portland State University, Center for Urban Studies.

ANALYSIS OF LAND & HOUSING MARKETS



Since that report was written, Metro deserves credit for developing the Metro-Scope model, which does incorporate some consumer housing preferences into the allocation model and for introducing sensitivity analysis into the demographic forecasts. Also, Metro brought forward a referendum to limit their ability to adjust local zoning. However, it isn't fair to use the 1996 report or my participation in subsequent panels at Metro as an endorsement for all the ways in which Metro planners are utilizing the MetroScope model.

Fundamentally, Metro staff need to recognize that the MetroScope model is being overwhelmed by the huge rent and price increases that are being required to fit the anticipated population growth inside the existing UGB. Unfortunately, there is no feedback loop inside MetroScope that allows citizens to move elsewhere in the United States if the rent levels in Portland double from their current levels as predicted by the model.

## **METROSCOPE'S SUPPLY CONSTRAINTS ARE EXTERNALLY CHOSEN**

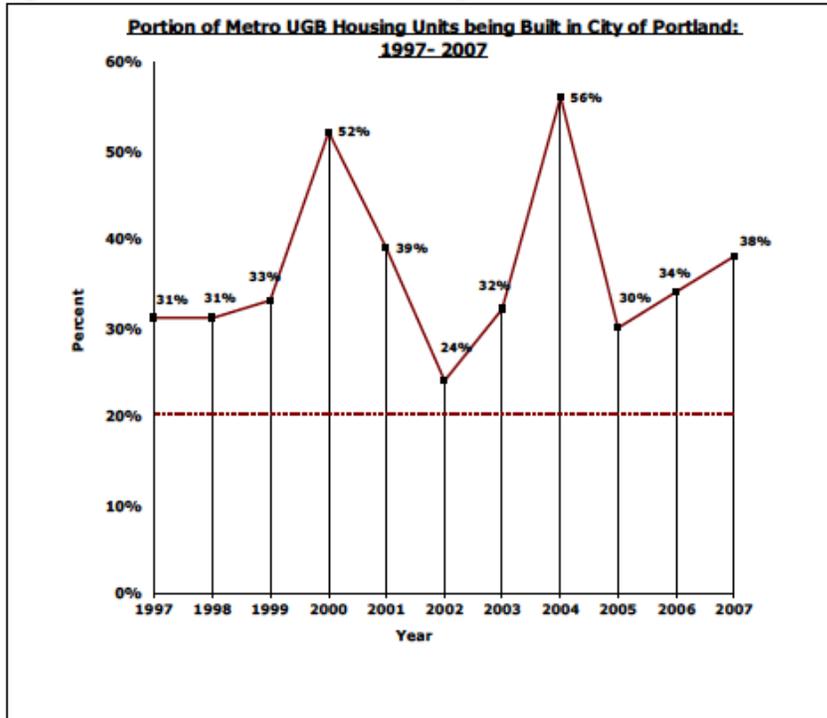
Williams and Vogt argue that the regional housing and employment capacity is determined by the policies and judgments of local officials and not a Metro or MetroScope assumption. That is exactly the problem with how the MetroScope model is being applied.

In establishing its buildable capacity, the City of Portland has offered large number of acres of land zoned for high density apartments that are currently occupied by other land uses. If you look at Appendix 4, pages 18-21, you find that 58 percent of the housing unit capacity within the Metro region is found in the City of Portland, well beyond its historic percentage. For example, if you look at a table from p. 41 of a 2009 City of Portland study, you will find that Portland averaged about 35 percent of the housing units built in the Portland Metro UGB from 1997-2007.<sup>3</sup>

---

<sup>3</sup> City of Portland, 2009. "Portland Plan: Household Demand and Supply Projections," Bureau of Planning and Sustainability.

Figure 10: Portion of Metro UGB Housing Units Built in Portland, 1997-2007



Portland's Goal:  
20%

Source: City of Portland Permits Data & Metro Information from Construction Monitor

Moreover, 89 percent of Portland’s capacity comes from redevelopment, which means the demolition of current houses and structures. This creates a significant cost to the developer since those existing structures have value and makes it less likely that the development will take place. In addition, redevelopment is facing increasing political risks due to citizen complaints about housing demolitions. Recent statements by Portland Mayor Charlie Hales suggest that Portland will create barriers to that limit the ability of property owners to demolish their properties in a redevelopment project.

Where will this high density housing be built? The planned location of future housing development capacity can be seen from p. 14 of a 2013 City of Portland study, which shows extensive development of high density housing in Downtown Portland, but also in the Lloyd District, the Pearl District, Central Eastside, and South Waterfront, as well as Interstate Avenue, the Gateway District, Rockwood, and 82nd Avenue.<sup>4</sup>

<sup>4</sup> City of Portland, 2013. “Comprehensive Plan Update: Growth Scenarios Report,” Bureau of Planning and Sustainability.

**Figure 5. BLI Housing Development Capacity**

Some of these areas are likely bets, but others are extremely unlikely. On the positive side, the highest rents in the region exist in Downtown Portland, the Pearl District, South Waterfront, and the Lloyd District, so anticipating demand there seems appropriate. However other areas face significant political barriers (the Central Eastside, Interstate Avenue) or very low demand (the Gateway District, Rockwood, and 82nd Avenue). As the MetroScope model churns away, looking for places to fit additional households without a UGB expansion, the demand pushes up rents through the region until these otherwise affordable locations until construction costs are covered. Because the theoretical capacity exists, this allows Metro to state in the Urban Growth Report that no expansion is needed today, while discussion of rent increases placed in an appendix.

## **METROSCOPE IS NOT DESIGNED FOR YEAR-ON-YEAR ANALYSIS**

Williams and Vogt argue that MetroScope is a long-run model and that my citation of annual Case-Shiller index housing price increases isn't relevant. My reference to the Case-Shiller index on p. 13-14 of my November article was to show that housing prices in the Portland region have fully recovered from the housing bust and are escalating rapidly. Supply in our region is constrained and the increase in demand has not lead to vigorous housing production, but rapid price escalation. For example, according to a recent report from real estate website Zillow, Portland has the fifth-fastest growing rental market in the country, with prices increasing by 7.2 percent between January 2014 and January 2015, while nationwide, rent increased 3.3 percent.<sup>5</sup>

In that sense, I think the response by Williams and Vogt is beside the point. It is well known that demand in Portland's apartment market has been on fire for many

<sup>5</sup> Zillow, 2015. "Rapid Rent Appreciation Reaches Beyond Housing Hot Spots to Smaller, Unexpected Markets." Press release, February 20.

years, and the decision to advocate a zero-expansion policy is pouring gasoline on that fire. Now is the exactly the time we should be adding urban reserves to the UGB so that housing costs are moderated.

## **METROSCOPE MODELS THE 7-COUNTY MSA, NOT METROPOLITAN PORTLAND**

Williams and Vogt claim that I am creating confusion between the 7-county Portland-Vancouver Metropolitan Statistical Area and the Portland Metro UGB area. I will agree that the terminology is confusing, but I think I've been clear in my presentation. Without providing a specific objection, I cannot respond.

## **METROSCOPE INCLUDES UGB EXPANSIONS**

In their letter, Williams and Vogt claim that, "In truth, a significant share of our designated urban reserves are assumed to be within the Metro UGB by the end of the planning period." This statement by Williams and Vogt is misleading. The computer runs of MetroScope test how much employment and residential capacity exists within the existing UGB. Page 26 of the Urban Growth Report asserts that under the baseline population and employment growth forecast, the existing UGB has 800 surplus acres for commercial development, 1,400 surplus acres for industrial development, 13,100 surplus acres for single-family development, and 9,600 surplus acres for multi-family development. If that forecast is accepted, no expansion in 2016 is warranted.

In the next 20 years of the planning horizon, the MetroScope model brings additional capacity from urban reserves into the UGB but at dates very far into the future. See the following table from the Urban Growth Report:

Table 4: Prospective UGB expansion modeling assumptions

Code	Year Available	SF DU	MF DU	Total DU	COM acres	IND acres
1C	2040	2,815	4,443	7,258	28	0
1D	2045	0	0	0	0	1,159
1F	2045	0	0	0	0	492
2A	2045	4,064	6,414	10,478	40	0
3B	2045	713	1,574	2,287	10	0
3C	2045	658	1,454	2,112	9	0
3D	2035	1,052	2,324	3,376	14	0
3F	2030	685	1,514	2,199	9	0
3G	2030	479	1,058	1,537	7	0
4A (1)	2040	1,293	2,856	4,148	18	0
4A (2)	2045	4,282	8,109	12,390	51	0
4B	2040	343	759	1,102	5	0
4C	2045	1,790	3,955	5,745	25	0
4D	2045	2,863	6,325	9,188	39	0
4E	2045	2,132	4,710	6,842	29	0
4F	2045	694	1,533	2,227	10	0
4G	2040	1,643	3,630	5,273	23	0
4H	2035	949	1,348	2,298	8	0
5A	2035	247	545	792	3	0
5B	2030	4,405	6,952	11,357	43	0
5D	2035	1,223	1,929	3,152	12	0
5F	2035	0	0	0	0	257
5G	2035	403	890	1,292	6	0
5H	2030	239	340	579	2	0
6A	2035	2,369	3,368	5,737	21	0
6B (1)	2035	1,846	2,913	4,758	18	0
6B (2)	2035	798	1,260	2,059	8	0
6B (3)	2045	804	1,269	2,073	8	0
6C (1)	2030	694	1,314	2,008	8	0
6C (2)	2035	433	820	1,254	5	0
6C (3)	2045	429	813	1,243	5	0
6D (1)	2035	445	702	1,147	4	0
6D (2)	2045	815	1,543	2,358	10	0
7A (1)	2040	309	585	895	4	0
7A (2)	2045	456	864	1,321	5	0
8A	2030	206	0	206	0	3
8C	2035	663	1,046	1,709	7	0

Code	Year Available	SF DU	MF DU	Total DU	COM acres	IND acres
8F	2035	1,453	2,742	4,195	17	0
	<b>Total</b>	<b>44,692</b>	<b>81,900</b>	<b>126,592</b>	<b>511</b>	<b>1,911</b>
	2030	6,708	11,177	17,885	70	3
	2035	11,881	19,888	31,769	124	257
	2040	6,403	12,273	18,676	77	0
	2045	19,700	38,562	58,262	240	1,651

As you look at the table of urban reserve areas (labeled “codes”), you find that only 17,885 units of housing capacity are added into the Urban Growth Boundary between 2015 and 2035. Compared to the overall increase in housing unit capacity of 392,685 dwelling units (Appendix 4, page 40), that increase in capacity represents only 4.6 percent of UGB expansion capacity, which implies that 95.4 percent of the future dwelling unit capacity comes from existing UGB capacity. Hence, calling this modeling run a “zero expansion” scenario is either a minor error, a rounding error, or an approximation.

Part of the reason for the disconnect between my analysis and the Williams and Vogt letter is that Metro staff claims that all of the Urban Reserves are included in the UGB in 2015-2035. However, Metro applies a 10-year delay period between when land is included inside the UGB and when “urban level” densities can be achieved, ostensibly to issues of zoning, governance, and lack of infrastructure. That delay period may be realistic, but it’s an argument in favor of acting now to expand the UGB.

In that sense, it’s important to realize that we are harvesting today the UGB expansions that were decided decades ago. Keeping in mind that we have about 240,000 acres inside the UGB, these are the past expansions over 1,000 acres

- 3,500 acres in 1998 (Pleasant Valley)
- 21,538 acres in 1999 (Damascus)
- 1,956 acres in 2004
- 1,958 acres in 2011

As a result, given the political dysfunction in Damascus today and the miniscule expansion in 2004 and 2011, we will have very little large suburban developments happening in the Portland region for a long time. And we won’t have any until 2025, unless we act today.

In their letter, Williams and Vogt claim that a “significant share of our designated urban reserves are assumed to be within the Portland UGB at the end of the planning period.” Whether 4.6 percent of dwelling unit capacity comprises a “significant share” assumes you think adding land to the UGB without the local government being willing and able to facilitate development is helpful. The biggest chunks of land for housing being added to the UGB in the modeling run are in Damascus (codes 1D, 1F, and 2A) and the Stafford Triangle (codes 4A, 4B, 4C, and 4D), both in the latest possible years, both with local governments uninterested in their development.

Metro further assumes that the expansion areas deliver housing unit capacity at 15 units per acre (Appendix 11, page 13). This assumption is particularly aggressive given that most inner Portland single family neighborhoods have been developed at about 8 units per acre, and one would expect lower cost suburban land to be built at lower densities. Part of that difference is explained by Metro’s assumption that two-thirds of the dwelling unit capacity in the UGB expansion areas will be developed as multi-family. However my data on apartment rent per square foot (November *Quarterly* article, p. 6-7) suggests that these expansion areas barely have sufficient rent levels to justify garden apartments. Of course, most of this capacity will come online in 2030-35 and (according to the Urban Growth Report) Portland area rent levels will be twice as high as they are today in the model.

## **ANY UGB EXPANSION REQUIRES PUBLIC SUBSIDY**

Williams and Vogt argue that I highlight the public subsidy costs of high density development and ignore the infrastructure costs of suburban single family development. I agree that all development requires some public participation, however there are established revenue sources for the road construction and sewer extension. What is often missing is the political will of county jurisdictions and Metro to raise the gasoline taxes and impact fees to fund those extensions. Gas taxes and system development charges are user fees where the driver or the developer who pays them receives some dedicated capital construction or improvement.

By contrast, the two areas of subsidy that I highlighted in my November article—subsidized housing and light rail transit—must rely upon urban renewal funds, payroll taxes, and other general fund revenue to be built and operated. And by diverting general fund revenue, we take money from schools, police, fire, and other essential functions of government. Moreover, the dependence upon subsidized housing is caused directly by the decision to not expand the Urban Growth Boundary and keep rents at unaffordable levels.

## **WAGES SHOULD BE INFLATED, NOT JUST PRICES**

Williams and Vogt argue that I inflate rents and prices, but I fail to inflate incomes. Of course, that’s true since I made no statement about incomes. What I think they are complaining about is my characterization that apartments rents will more than double in 20 years under the planning scenario that I’ve modeled. In fact, all

the dollar numbers in the Urban Growth Report are shown in inflation-adjusted values, which is a standard reporting method for academic researchers.

As a result, the reader is left with the antiseptic conclusion in Table 4 in Appendix 5 that average rents will grow by 37 percent in 20 years and average prices will rise by 52 percent in 20 years. To the typical citizen who is not well versed in economics, that sounds like a manageable rate of increase. Rent increases of 37 percent in 20 years sounds like 2 percent per year, which is normal for inflation these days. Now, if they are told that rents will increase by 37 percent and incomes will stay the same, they will look at these numbers differently. Better yet, if they are told that rents will rise 124 percent in 20 years, they can make their own conclusions about whether their own incomes will keep pace. In practice, people make their economic and political decisions in nominal dollars, and not in some kind of economic planning superworld where they factor in inflation rates. In any case, all my statements were very clear about the inflation assumption I used. Metro staff are welcome to assume income increases greater than my 2.5 percent inflation assumption, but they have no economic levers to make such a rosy scenario happen. My point is that when rents rise in inflation-adjusted terms, housing will become less affordable.

## **CITIZENS PREFER CENTRAL CITY LOCATIONS**

Williams and Vogt argue that recent data suggests that young people prefer central city locations, not suburban housing. However, Metro's own Residential Preference Survey, which is now Appendix 14 of the Urban Growth Report, suggests that most current renters aspire to homeownership, including a backyard, not apartment living. It is true that we've seen a lot of apartment development in the City of Portland in 2007-2015, but that's due to several unique circumstances: the Great Recession and the loss of jobs, the decline in house prices and net worth of households, the delay in marriage among young people, and the lack of land for single family home construction.

The first three events are temporary. We have seen a steady expansion of jobs over the last five year. We've seen housing prices and household net worth recover. And biology dictates that young Millennials who delayed marriage will marry and have children. Central cities are attractive when young people are single and looking to meet others of similar age, but they are expensive plans to raise a family. The fourth factor—the lack of single-family home construction—is partly a result of Metro's current zero-expansion policy for the Urban Growth Boundary and partly the challenge of obtaining finance for single family home construction. During the Great Recession, Federal policy caused a tightening of credit standards for homebuyers, while credit was made easier for apartment construction.

## **SINGLE-FAMILY PRODUCTION WILL REQUIRE LARGE UGB EXPANSION**

Williams and Vogt argue that, "Ensuring that half the region's new housing is single-family would require the development of at least 4,000 acres every six years—

that’s an area three-quarters the size of Forest Park.” This is a scare tactic, which suggests that I would like to see Forest Park converted to single-family housing.

In practice, 4,000 acres is less than 2 percent of the land currently within the Urban Growth Boundary. And Metro has already identified over 8,000 acres of land adjacent to the UGB as urban reserves. Their calculation suggests that we could accommodate 12 years of development at something close to the historic split of single-family and multi-family construction using the existing urban reserves. Plus the Metro region has more land that is not designated as rural reserves, either. As a result, we can adopt a plan with less density and lower housing costs. And there’s no reason to offer the hyperbole that Forest Park needs to be developed.

## **SELECTIVE USE OF METROSCOPE MODEL RESULTS**

Finally, Williams and Vogt repeat their claim that I’ve served on a Metro review panel and endorsed the MetroScope model while at the same time as criticizing the model. Again, my position is that the development of MetroScope is a great achievement for Metro and that the planners at Metro need to consider whether the result make sense. The MetroScope model run—using the zero-expansion policy established by the Region 2040 Plan—suggests that apartment rents will need to double to achieve the desired density. That result seems implausible, and that reflects the weakness that MetroScope cannot adjust its demographic forecast to reflect the housing rent appreciation.

As I argued in the November article in the *Quarterly*, doubling rents in the Portland metropolitan area will make housing costs in Portland equivalent to the Bay Area, Los Angeles, and other high-cost markets in the United States. Much of the economic growth in the region is predicated on our housing costs being lower than the Bay Area. As a result, the more likely outcome from the zero-expansion policy is less economic opportunity and less population growth in the region. Ultimately, I think the Metro Council needs to recognize that an adequate land supply is needed for housing affordability and economic prosperity. ■

## APPENDIX: METRO STAFF COMMENTS

*The following are comments dated December 3, 2014 from Metro staff, John R. Williams (Deputy Planning Director) and Molly Vogt (Interim Research Center Director).*

We believe there is broad agreement in our region about protecting our outstanding natural resources and our amazingly livable communities. Ensuring those protections is the intent behind Oregon's land use system and the goal of the work we do at Metro every day. What also is clear is that managing urban growth is a challenging, complicated endeavor. That is why Metro uses a technical tool called MetroScope to help inform decision makers about the tradeoffs involved in different policy decisions. Again, MetroScope informs policy decisions. It does not make them.

While Metro welcomes the opportunity to discuss MetroScope, our technical work and relevant policy questions, your recent critique of Metro's Urban Growth Report contains significantly misleading statements and errors.

Metro's draft Urban Growth Report has undergone extensive review for two years by more than 40 experts from the private sector, public sector and academia. We have made great efforts to provide information and clarity that could assist you in gaining an understanding and conducting an effective review of our work. We pointed out that your draft contained numerous inaccuracies and mischaracterizations. We offered to meet with you to answer your questions but you declined. Instead, you have spread misinformation via the media.

To ensure an informed policy conversation, Metro believes it is vital to address some serious problems with your work. Here are ten:

1. MetroScope is an economic forecasting model that takes into account household tenure, single-family versus multi-family, and location preferences for residential housing. This speaks to the demand side of the economic model which accounts for tastes and preferences of different types of households. Notably, during 2008, you were part of a PSU review team that found:

“MetroScope integrates the residential housing model with transportation, land use, and commercial location models. Thus, this analysis is consistent with the models and assumptions used for transportation and urban growth boundary (UGB) planning. It can therefore provide a fuller and more realistic model of housing development that incorporates the impact of household choice, development economics, and commuting preferences.”

Your statement that “in the MetroScope model, housing preferences play no role, only zoning capacity,” is incorrect.

2. MetroScope factors in the development currently allowed by local cities and counties based on their locally adopted zoning districts and a detailed buildable land inventory. In fact, that is the real purpose of the urban growth report, as required by state law—to assess how future growth will be accommo-

- dated under existing plans and policies. These local inputs are the residential supplies utilized in forecasting future growth trends. They are externally decided and not MetroScope “assumptions.” MetroScope is a robust equilibrium model that balances housing demand and supply. Your statements about many of the model's inputs are incorrect.
3. MetroScope operates in 5-year increments rather than Case Shiller index's annual increments. It is not designed or intended to capture exact annual variations but does produce similar trending information when used appropriately to look at the longer time periods, such as 2015 to 2035.
  4. MetroScope is a regional model for the seven-county Metropolitan Statistical Area (MSA). It models growth across the entire seven-county area, not just the Metropolitan Portland UGB as you claim. Again, your statements are incorrect. Importantly, a number of model outputs including vehicle miles traveled, housing tenure, and housing production mix will also vary across these different geographies.
  5. You assert that MetroScope does not account for any future UGB expansions between now and 2035 and that the model forces growth into the existing UGB. When we model what happens under current policies we factor in future UGB expansions within our region's already designated urban reserves. In truth, a significant share of our designated urban reserves are assumed to be within the Metro UGB by the end of the planning period.
  6. There can be no doubt that virtually all development requires some public investment. Nonetheless, your analysis asserts that costs only apply to existing plans and policies but somehow don't apply if development occurs in UGB expansion areas.
  7. Your findings are skewed because you inflate housing prices but not wages. At the same time, you fail to make any meaningful or documented connection among the inflation you allege will occur and the relative supply of land.
  8. You ignore the fact that people are voting with their feet. The popularity and redevelopment of close-in neighborhoods, main streets, and town centers is based on the fact that many people want to live in communities where they can walk, use transit or bike if they want. Metro's work is directed at giving people more choices to live in these kinds of communities. That's the best way to ensure affordability for everyone.
  9. You ignore that your preference for unregulated growth and development has high costs, and that the public and elected officials have consciously and repeatedly chosen the path we are on for a wide variety of social, environmental and economic reasons. Ensuring half the region's new housing is single-family would require development of at least 4,000 acres every six years—that's an area three-quarters the size of Forest Park. And yet, you offer no

realistic path to paying for the public structures and systems required to support that style of growth while decrying the costs for the alternative.

10. Finally, you dismiss the MetroScope model, but you make selective use of its data on several occasions where the data support your conclusions. The MetroScope model has been peer reviewed, including a 2008 review by a team at PSU that included you.

We stand by our work and welcome a reasonable and factual debate about what's best for our growing region. Unfortunately, your paper moves us away from that debate and perpetuates misunderstanding about MetroScope, the Urban Growth Report and the very real challenges of planning for and managing urban growth. Just as we offered before, we remain willing to meet to discuss these important matters. ■