

# Measures already implemented by Metro to promote the development of housing

## Overview and context

Statutes instruct Metro, when completing its RHCS, to review and consider measures already implemented to promote the development of needed housing. This review can inform Metro as it considers possible actions for inclusion in the 2025 RHCS.

Metro's engagement in promoting diverse housing dates to its origins in the late 1970s. Before Metro was formed, the Columbia Region Association of Governments (CRAG) had an even longer history. Metro's more recent history (2000s forward) illustrates its shift from its role as a policymaker and regulator towards its role as a convener, provider of data and analysis, advocate for best practices, and administrator of regional funding.

Metro's past and current work in the housing sphere can be grouped into several general categories:

- Regional policies
- Regulation
- Legislative advocacy and participation in rulemaking
- Best practice and information sharing
- Partnerships and collaboration
- Anti-displacement focus in transit corridor planning
- Funding

Current and past programs and efforts are listed to provide a fuller picture of Metro's engagement in housing. Lessons can be gleaned from what Metro has chosen to continue as well as efforts that are no longer active. This review excludes several programs that have indirect connections to the housing topic but that have long-term impacts on regional growth patterns, housing production, anti-displacement, and affordability. Examples include the Regional Transportation Plan, the Climate Smart Communities Strategy, Regional Flexible Fund Allocations, and economic development activities that impact job creation and household incomes.

As additional context for the roles that Metro has filled, it is worth noting at least two legal constraints on Metro's regulatory authority that guide Metro's focus on non-regulatory approaches. First, Metro's voter-approved [Charter](#) includes a prohibition against Metro requiring residential density increases in single-family neighborhoods within the existing urban growth boundary. To some extent, this prohibition has been rendered moot by state requirements for local jurisdictions to allow middle housing in neighborhoods. However, this Charter provision does still bar Metro itself from requiring additional density in neighborhoods.

Second, Oregon Revised Statute 197A.465 (2) states that Metro may not adopt a land use regulation or functional plan provision, or impose as a condition for approving a permit a requirement that has the effect of establishing the sales or rental price for a housing unit or residential building lot or parcel, or that requires a housing unit or residential building lot or parcel to be designated for sale or rent to a particular class or group of purchasers or renters.

## Regional policies

Regional policies provide high-level guidance on the long-range vision for the region. Typically, these policies are implemented through a variety of other programs, partnerships, and regulations. Many of these types of efforts occurred in the 1990s, with subsequent refinements to policies over the years.

### Areawide Housing Opportunity Plan

*Status: inactive*

In 1979, the Metro Council adopted the Areawide Housing Opportunity Plan to promote the planning and construction of affordable housing. The U.S. Department of Housing and Urban Development approved the plan in 1980.

### Metro Housing Goals and Objectives

*Status: inactive*

In 1980, the Metro Council adopted Metro Housing Goals and Objectives, which were intended to address Statewide Planning Goal 10 (Housing).

### Future Vision

*Status: update initiated in 2025*

As required by Metro's Charter, the Metro Council adopted a Future Vision in 1995. The Future Vision contains high-level statements about the region's desired future and general descriptions of some of the implementation measures to take. It describes a goal of having a variety of housing and neighborhood choices as well as a goal to intensify urban development. Metro has recently begun a process to update the Future Vision.

### Regional Urban Growth Goals and Objectives (RUGGOS)

*Status: inactive; now implemented through other plans*

The RUGGOS were adopted by the Metro Council in 1995 to establish regional policies that were a precursor to regulations in the 1996 Urban Growth Management Functional Plan. The RUGGOS did not directly regulate local governments but established many of the topic areas that were eventually addressed in regulations. Regarding housing, the RUGGOS called for a "fair share" approach to planning for housing affordability around the region. Concepts found in the RUGGOS have been incorporated into subsequent planning documents.

### Regional Framework Plan

*Status: active and periodically updated*

Metro's Regional Framework Plan was adopted in 1997 and has been amended in the ensuing years. The Framework Plan describes the high-level policies of the Metro Council, with [Chapter One](#) describing Metro's land use policies.

Policy 1.3 addresses Housing Choices and Opportunities, emphasizing the Metro Council's commitment to providing a variety of housing choices, "paying special attention to those households with fewest choices." The Metro Council's policies also emphasize the importance of

focusing housing growth in centers, corridors, and other areas that are well-served by transit to reduce the combined cost of housing and transportation.

Of relevance to the Regional Housing Coordination Strategy, policies 1.3.5 through 1.3.13 focus on the Metro Council's approach to working with local jurisdictions with a focus on incentives and coordination.

## 2040 Growth Concept

*Status: active and periodically updated*

Adopted in 1995, the 2040 Growth Concept is the region's long-range spatial plan for growth. The Growth Concept, implemented through a variety of other programs, partnerships, and policies, seeks to focus housing growth in the Central City, Regional Centers, Town Centers, Corridors, Main Streets, and Station Communities. These 2040 "design types" are intended to have a variety of activity levels and mixed-use, transit friendly development. The Growth Concept also envisions carefully planned urban growth boundary expansions into designated urban reserves as well as growth in neighboring cities outside of Metro's jurisdiction. Large portions of the region are designated as Neighborhoods in the Growth Concept. Per Metro's voter-approved Charter, Metro is prohibited from requiring density increases in existing Neighborhoods.

The 2040 Growth Concept Map has undergone periodic updates since its original adoption to reflect:

- New centers such as Cornelius Town Center and Tanasbourne/Amber Glen Regional Center
- Conceptual centers have been replaced with specific center boundaries
- Designated urban and rural reserves
- New and proposed high-capacity transit lines
- UGB amendments
- Changes to Title 4 designations (Industrial and Employment Areas)
- Simplification of Inner Neighborhoods and Outer Neighborhoods into the combined "Neighborhoods" design type
- New parks and natural areas

Metro intends to update the 2040 Growth Concept in the next several years.

## Strategic Plan to Advance Racial Equity, Diversity, and Inclusion

*Status: active*

In June 2016, Metro adopted the [Strategic Plan to Advance Racial Equity, Diversity and Inclusion](#). The strategic plan focuses on removing barriers for people of color and improving equity outcomes for these communities by improving how Metro works internally and with partners around the Portland region. The strategic plan identifies an objective of convening regional partners to support the development of stable and affordable housing.

## Regulation

Metro's [Urban Growth Management Functional Plan](#), which was first adopted in 1996, is the primary way that Metro implements the Metro Council's Framework Plan policies through

regulation. However, the Functional Plan does not directly regulate development. Instead, the Functional Plan contains direction to cities and counties about what must be addressed in their local plans. Metro completes an annual compliance report that documents local jurisdiction compliance with the Functional Plan. Amendments to the Functional Plan have generally been incremental and it has been approximately two decades since Metro last undertook the development of a new Functional Plan Title (Title 13: Nature in Neighborhoods).

## Urban Growth Management Functional Plan

*Status: active and periodically updated*

### *Title 1: Housing Capacity*

- Intended to encourage compact urban form and a fair-share approach to meeting housing needs.
- Generally, requires cities and counties to maintain or increase their housing capacity.
- Requires cities and counties to allow accessory dwelling units in zones that authorize detached single-unit dwellings. This provision predates state requirements to allow ADUs by about two decades.

### *Title 6: Centers, Corridors, Station Communities, and Main Streets*

- Encourages mixed-use, transit-friendly development in designated urban centers and corridors.
- Identifies 2040 Growth Concept centers, corridors, station communities, and main streets on the Title 6 Map. Requires local adoption of boundaries for centers by the end of 2025.
- Metro's 2040 Growth Concept centers serve the role that Climate Friendly Areas do elsewhere in the state under the state's Climate Friendly Equitable Communities (CFEC) program. This recognizes that the Metro region's work to encourage compact, mixed-use development in centers predates the CFEC program by almost 30 years.
- Sets voluntary expectations for cities and counties if they wish to be eligible for regional investments, currently defined as high-capacity transit.
- Provides cities and counties with opportunities for lower mobility standards and trip generation rates in these urban design types, facilitating housing development.

### *Title 7: Housing Choice*

- Set voluntary affordable housing production goals for the 2001 to 2006 time period for local jurisdictions.
- Requires local jurisdictions to report on regulated affordable housing production. To ensure consistency in reporting, Metro has taken on updating the regional inventory of regulated affordable housing on a periodic basis.
- See Attachment 1 for additional history regarding Title 7. Generally, Metro's attempt at setting affordable housing production goals was unsuccessful, in large part because local jurisdictions were unable to meet those goals without funding. This history appears to indicate that establishing numeric housing production goals and reporting requirements are not a substitute for funding public housing.

### *Title 11: Planning for New Urban Areas*

- Establishes requirements for local jurisdictions when concept planning for urban reserves and when comprehensive planning for recent UGB additions.

- Specifies that a concept plan for an urban reserve shall be developed prior to its addition to the UGB.
- Requires that a local jurisdiction consider the housing needs of the city, county, and region when planning for new urban areas. This requirement was adopted on the advice of MPAC who, in 2010, deliberated approaches to supporting affordable housing in new UGB expansion areas. MPAC formed a subcommittee to discuss the topic and ultimately did not recommend any specific housing affordability requirements for concept plans because they wished to be sensitive to local conditions.

*Title 12: Protection of Residential Neighborhoods*

- Reiterates the Metro Charter prohibition against Metro requiring density increases in single-family neighborhoods.

*Title 14: Urban Growth Boundary*

- Depicts the UGB and adopted urban and rural reserves on the Title 14 Map.
- Describes several processes by which the Metro Council may consider expansion of the UGB for housing needs.
  - Legislative UGB amendments: per statute, considered at least every six years based on completion of an Urban Growth Report (UGR), which includes a regional forecast, a regional housing needs analysis (current and future housing needs), a regional buildable land inventory, and reporting on housing trends.
  - Mid-cycle UGB amendments: process adopted by Metro in 2017 per state enabling legislation that was sought by Metro and a coalition. Provides a mid-cycle opportunity for cities to propose residential UGB expansions upon a demonstration that there is a need to revise the most recent UGR (i.e., household growth or residential land consumption is happening faster than anticipated).
- Describes the Metro Council's use of conditions of approval when expanding the UGB to specify expectations for urbanization and housing planning.

## Anti-displacement focus in transit corridor planning

Historically, decisions on major public investments have not fully involved the people impacted by the immediate or downstream effects of these investments. Without bringing in the perspectives of the full range of impacted stakeholders, the social and economic implications of major transportation, land use and economic development decisions are not adequately explored. This lack of direct dialogue results in missed opportunities to effectively address key concerns, develop sustainable solutions and, ultimately, achieve equitable outcomes.

Beginning with its work on the Southwest Corridor high-capacity transit project, Metro has focused on equitable development in all subsequent corridor planning efforts, including 82<sup>nd</sup> Avenue, Division St., and Tualatin Valley Highway. Ongoing implementation efforts are aimed at ensuring that businesses and residents can remain in these communities and enjoy the benefits of improvements.

## Legislative advocacy and participation in rulemaking

*Status: active*

Metro routinely participates in state legislative processes related to housing and urban development. Typically, Metro is supportive of legislation that enhances housing choices, housing funding, infrastructure provision, and efficient use of land.

Metro has participated in state rulemaking related to the OHNA program since its inception, both on rulemaking advisory committees and on several technical advisory committees.

## Funding

### Transit-Oriented Development program

*Status: active*

Established in 1998, Metro's [Transit-Oriented Development program](#) makes strategic investments in high-density communities along greater Portland's high-frequency transit network. The program plays an important role in supporting development that is aligned with the region's 2040 Growth Concept.

The 2023 Transit-Oriented Development Program Strategic Plan formalized and expanded on Metro's commitment to fostering equitable and climate-friendly communities designed around the region's transit system. It set new goals around affordability, climate and racial equity, and it provided additional concepts to leverage funding to increase the program's impact over time.

The program's desired outcomes place equity and healthy communities at the core:

- Higher density that supports transit ridership
- Places that are safe, convenient and enjoyable without a car
- Preventing displacement of communities of color and people with low incomes
- Increased number of affordable housing units near frequent service transit
- Economic benefits for people with low incomes and people of color
- Innovation in housing development and design to advance equity, demonstrate climate leadership and achieve cost efficiency
- Equitable Development Strategies
- To date, the Transit-Oriented Development Program has produced 11,139 housing units in the region. More than half are permanently affordable to people making 60 percent or less of area median income. The program has also produced over a million square feet of retail space near transit.

### 2040 Planning and Development Grants

*Status: active*

Since 2006, Metro has administered a [grant program](#) that utilizes revenues from a construction excise tax to fund local planning efforts aimed at removing barriers to development. The program was originally focused on funding UGB expansion area concept planning efforts but has been expanded to include planning efforts inside the existing UGB. Since its inception, Metro has awarded more than \$30 million to fund over 135 projects around the region. These grants enable Metro's partners to update their plans and policies to encourage more housing production. In the last

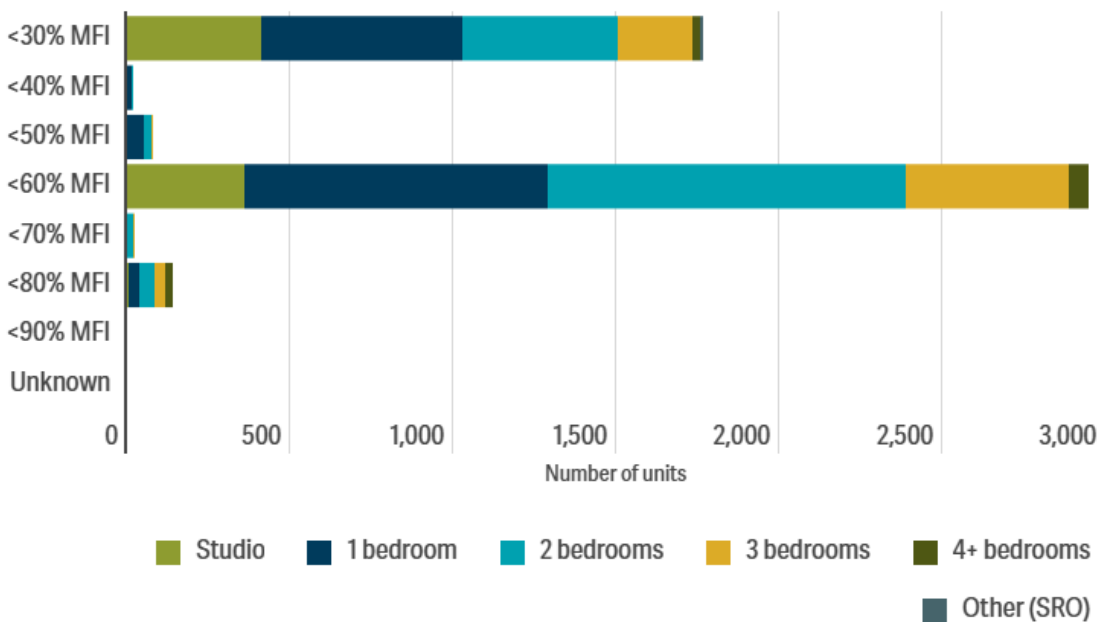
decade, the grant program has focused more on supporting equitable housing, including a special grant round in 2016 with that focus.

## Affordable Housing Bond

*Status: active*

In 2018, Metro asked voters to support the creation of new affordable housing in the region. The resulting voter-approved bond generates \$652.8 million for new affordable housing construction in the region and is on track to create an estimated 5,600 affordable homes – 1,700 more than its initial goal.

**Metro affordable housing bond unit type by affordability**  
**(2025, completed and in-process)**



### Metro site acquisition program

The affordable housing bond program sets aside 10% of its funds for [Metro's Site Acquisition Program](#), which was created to buy land for affordable housing where the region needs it most. Guided by community input gathered at the beginning of the program, Metro staff search for sites across greater Portland that are near amenities like grocery stores, parks, schools and transit, and meet one or both criteria: areas where communities of color are at risk of displacement and areas with limited affordable housing options.

The site acquisition program has resulted in 672 new residential units around the region. They are being built in all three counties and half are larger (2+ bedroom) units for families. Slightly less than half (268 units) will be for people who make 30 percent or below area median income.



## Supportive Housing Services

*Status: active*

In May 2020, voters in greater Portland approved Measure 26-210 to fund services for people experiencing or at risk of homelessness. Metro now works with [Clackamas](#), [Multnomah](#) and [Washington](#) counties to reduce homelessness through programs and services that help people find and keep safe and stable homes. These include but are not limited to:

- Emergency services such as outreach and shelter
- Placement into housing
- Help paying rent (both emergency and [long-term rent assistance](#))
- Advocacy and case management
- Services in the areas of mental health, physical health, language and culture needs, education, employment, addiction and recovery, tenant rights and others.

## Brownfield assessment grants

*Status: active*

Contamination or perceived contamination of properties can prevent them from providing new housing and business opportunities. Metro offers assistance for brownfield site assessments for properties that could be developed into community assets. This grant from the EPA runs through Sept. 30, 2028.

The project focuses on several main areas:

1. Conduct full Phase I/Phase II environmental site assessments on properties throughout greater Portland, with an emphasis on four target corridors.
2. Work with community members to increase understanding of how brownfields impact communities and how to engage in cleanup and redevelopment.
3. Provide technical assistance to property owners addressing contaminated sites.
4. Work with community members and potential developers to move forward with site cleanups based on redevelopment opportunities.
5. Build capacity of residents and local businesses to access careers and job opportunities in environmental remediation and redevelopment.
6. Build partnerships and engage communities.

## Regional Housing Choice Revolving Fund

*Status: inactive*

In 2007, the Metro Council approved a one-million-dollar contribution as seed money for the creation of a \$10-\$20 million Regional Housing Choice Revolving Fund (RHCRF). The intent was to leverage \$9-\$19 million in matching contributions from public, private, and charitable partners to create the fund, which would be managed by an experienced nonprofit community-based fund administrator and governed by a regional board of directors.

Metro's contribution of \$1 million was contingent upon several conditions being met, including the establishment of a fund with at least \$10 million in capital. Upon the two year deadline for meeting those conditions, financial matches were inadequate.



Had it been fully funded, the RHCRF would have extended low-interest loans to catalyze the development and preservation of affordable housing in the Metro area with a focus on implementing the 2040 Growth Concept. Non-profit and for-profit developers would utilize these low-interest loans for such purposes as site acquisition and holding, predevelopment costs for planning and design, and short-term debt financing for the acquisition of existing rental properties with expiring affordability requirements.

## Best practices and information sharing

### Social Vulnerability Explorer

*Status: active*

The [Social Vulnerability Explorer](#) is a publicly available online mapping tool maintained by Metro that provides socioeconomic and demographic spatial data. Commonly used data from the U.S. Census Bureau sometimes do not fully capture information about vulnerable people and their needs. The Social Vulnerability Explorer boosts this Census data with other data sources that have demographic information. The data can be explored at various levels: neighborhood, city and county. It offers this information in a way that can be visualized and analyzed through maps using only a web browser.

### Distributed Forecasts

*Status: active*

To fulfill its forecast coordination responsibilities, Metro conducts a regional population, household, and employment forecast at least every six years as part of its urban growth management decisions. The most recent regional forecast was adopted as part of the [2024 urban growth management decision](#). After the adoption of a regional forecast, Metro undertakes what it calls a [Distributed Forecast](#), which describes how much growth is expected occur in each Metro area jurisdiction. The Distributed Forecast is developed in coordination with local jurisdictions. These forecasts are considered by the State of Oregon Department of Economic Analysis when setting housing targets and housing need allocations for cities and urban unincorporated areas under the OHNA program. Metro will soon begin the process of developing the 2050 Distributed Forecast and anticipates Council consideration in 2026.

### Construction Careers Pathways

*Status: active*

Additional skilled tradespeople are needed to support housing production in the region. The [Construction Career Pathways policy framework and toolkit](#) outlines seven critical strategies to provide reliable career pathways for women and BIPOC people. These strategies were developed by the Public Owner Workgroup, which was comprised of 16 public agencies, and included significant input from industry and community stakeholders. Currently, nine public agencies have formally adopted the framework:

- Metro
- Prosper Portland
- Clackamas County

## Appendix 5

### 2025 Regional Housing Coordination Strategy

- Multnomah County
- Washington County
- City of Portland
- Portland Public Schools
- Portland Community College
- TriMet

Metro will be working with additional jurisdictions to adopt the framework, support their implementation and build collaboration to increase the impact of these strategies throughout the region.

## Residential development indicators

*Status: active*

Metro produces biennial reports on housing development inside the UGB. The most recent report is available as [Appendix 5A to the 2024 Urban Growth Report](#). The report highlights housing construction and land use trends, including information on housing types, locations, and densities.

## Regional Barometer

*Status: inactive, no longer available*

The Regional Barometer is an open data tool that provides a snapshot of data from early 2020. The tool provided facts and figures, access to related stories, research and reports, and downloadable data for additional analysis.

## Regional Snapshots

*Status: inactive, but available online*

In this now-defunct web-based storytelling effort, Metro used data and personal accounts to highlight challenges related to community development and change. Several installments focused on housing production and housing affordability. In keeping with its goal of raising awareness of topics, the Regional Snapshots program also hosted a series of speaker events, several of which focused on housing diversity and affordability.

## Community Investment Toolkits

*Status: inactive, but available online*

From about 2007 to 2010, Metro developed several [Community Investment Toolkits](#). These toolkits offered best practices for innovative designs, financial incentives, and system development charges to encourage housing production.

## Expert Advisory Group on Developing Centers and Corridors

*Status: inactive, but report is available online*

In 2009, Metro convened an expert advisory group to identify barriers to mixed-use, compact development. The group produced a report, which is [available on Metro's website](#).

## State of the Centers

*Status: inactive, but reports are available online*

In the early 2000s, Metro published several [State of the Centers](#) reports. 2040 Centers are intended to be a primary location for housing and job growth. These reports provide a description and demographic information for each center, highlight community actions to enhance it, and list its private and public amenities. A now-defunct online data tool on centers was also created by Metro.

## Regional Equity Atlas

*Status: inactive; some older opportunity maps remain available online*

On the heels of the region's unsuccessful 2010 and 2011 applications for a HUD Sustainable, Livable Communities Grant, Metro partnered with the Coalition for a Livable Future to complete the Regional Equity Atlas 2.0. The Atlas consisted of an online mapping tool that provided decision makers and others with the means of creating opportunity maps that depicted disparate outcomes for marginalized communities to inform policy and investment decisions, particularly decisions about where to encourage housing development. The partnership also included a series of trainings to build community capacity to use the mapping tool to influence decision making. Metro provided a series of opportunity maps in past urban growth reports.

## Parcelization Study

*Status: completed*

This [2012 study commissioned by Metro](#) sought to understand the extent to which parcelization of land (division of land into many parcels) is an impediment to development. The study found that, of the many barriers to development, parcelization is probably not generally a major issue. However, it may be a critical problem in specific instances.

## Equitable Housing Initiative

*Status: completed*

The Equitable Housing Initiative was a precursor to Metro's housing funding measures. The initiative produced a 2016 report entitled [Opportunities and Challenges for Equitable Housing](#).

## Housing preference survey

*Status: complete*

To inform the 2014 Urban Growth Report, Metro partnered with several organizations to conduct a [residential preference survey](#) that sought to develop a better understanding of housing and neighborhood preferences and how respondents weigh tradeoffs like costs and commute times. The survey used a variety of techniques including a revealed preference survey, a stated preference survey, and traditional attitudinal surveys. It proved difficult to draw conclusions from this work because of population sampling challenges.

## Partnerships and collaboration

### Brownfields Coalition

*Status: active coalition*

Since 2014, Metro has led the statewide Oregon Brownfield Coalition, a group of more than 50 public, private, and nonprofit organizations. The mission of the coalition is to advance the cleanup and reuse of brownfields to improve the environment, economy, and health of communities across Oregon. The coalition has successfully advocated for [legislation to support brownfield remediation](#).

### Build Small Coalition

*Status: active, but not longer convened by Metro (now convened by DLCD)*

The Build Small Coalition was originally convened by the Oregon Department of Environmental Quality and focused on the waste reduction benefits of smaller format housing. At DEQ's request, Metro took over convening this group for several years. Under Metro's leadership, the coalition's focus shifted towards the affordability and land use efficiency of smaller format housing. Under Metro's leadership, the coalition completed an [audit of local zoning codes related to accessory dwelling units](#), organized middle housing tours, hosted guest speakers, and held two Build Small, Live Large Conferences. In recent years, as the state became more active in middle housing topics, the Department of Land Conservation and Development took over convening the consortium.

### HUD Sustainable, Livable Communities Coalition

*Status: inactive*

Metro filled a convener role in organizing a regional consortium to submit Sustainable, Livable Communities grant proposals to the U.S. Department of Housing and Urban Development in 2010 and again in 2011. The coalition was not awarded a grant either year. The proposed work would have included opportunity mapping, regional analyses of impediments to Fair Housing, community capacity building, refinements to regional housing needs analysis methods, a pilot program to explore Section 8 voucher portability across the three-county area, and the development of regional housing strategies.

## Attachment 1: Functional Plan Title 7 historic context

### Voluntary housing goals and initial reporting requirement

In a settlement to a challenge on the 1997 Urban Growth Management Functional Plan relating to inclusionary housing, the Oregon Land Use Board of Appeals mandated that Metro convene a task force (the Affordable Housing Technical Advisory Committee or HTAC) to develop a Regional Affordable Housing Strategy. Based on the work of this group, Metro adopted an ordinance in 2000, amended in 2002, which required local jurisdictions to consider actions that would promote affordable housing and a voluntary affordable housing production goal for five years 2001 - 2006. Those voluntary goals can be found in Title 7. Local jurisdictions were required to submit progress reports over the next few years to Metro.

### Progress reports 2002 - 2005

About half of the local jurisdictions submitted progress reports in the timeframe specified in Title 7. All but two eventually submitted reports, though they were abbreviated. The results of these progress reports were summarized in the 2004 compliance report (released by the Council in early 2005) and then summarized again in a memo to MPAC in 2006. As the compliance report indicates, few cities adopted the voluntary housing goals. Though many jurisdictions considered actions to promote affordable housing, few adopted them.

### New Housing Choice Task Force: 2006 recommendations

As required by Title 7, Metro reconvened the housing Task Force in 2005. In 2006, MPAC and Council endorsed the recommendations from the Task Force, which called for Metro and the region to take a variety of actions to promote housing. When Title 7 was amended, MPAC and Council voted to retain the voluntary housing production goals and amended the text to indicate that the goals would be amended over time and to continue reporting requirements for local jurisdictions on affordable housing production.

### Title 7 progress reports suspended in 2007

Within a year of the adoption of the new Title 7, after review and discussion at Council, the Metro Chief Operating Officer suspended Title 7 reporting requirements. This was based on the experience that the reports were not providing consistent information, were a burden to local jurisdictions, and were not helping result in getting more housing built. The suspension was intended to allow Council to reconsider the role of these requirements. Today, the voluntary affordable housing production targets for the 2001 to 2006 period are considerably out of date. Because the state now sets housing targets for local jurisdictions under the OHNA program, there is not a clear rationale for Metro establishing updated production goals, which would likely add confusion to the OHNA program.