

Memorandum

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From: **Todd E. Mobley, PE**

Date: **June 9, 2022**

Subject: **Iseli Subdivision (14917 SE 142nd Avenue) – Transportation Impact Study Addendum #1**

Introduction

This memorandum is written to respond to comments received from County staff regarding the Transportation Impact Study¹ (TIS) that was prepared by Lancaster Mobley. Specifically, the TIS did not include a planning horizon analysis or address the zone change, which is part of the land use application with the subdivision. This memorandum addresses the zone change and the Transportation Planning Rule (TPR) and serves as an addendum to the original TIS.

The site is approximately 21.12 acres in size and is currently zoned with 5.59 acres of R-15 and 15.53 acres of FU-10. The FU-10 is a holding zone for land that is planned for urban development and the change in zoning is required before development can occur. The proposed zone change results in 8.71 acres of R-8.5 and 12.41 acres of R-15. Both the R-8.5 and R-15 zones are consistent with the existing comprehensive plan land use designation of Low Density Residential. As such, the proposal is in conformance with the comprehensive plan.

A large portion of the site is undevelopable due to topography, resulting in the proposed 40-lot subdivision, which is significantly fewer lots than could be built based on the zoning and the land area.

Transportation Planning Rule

Because the proposal includes a change in zoning, the TPR is applicable to the application. The TPR ensures that the transportation system is capable of adequately accommodating any potential increase in traffic demand that may result from an amendment to an adopted plan or land use regulation. The primary test implemented by the TPR is whether an application will “significantly affect” the transportation system. If there is not a significant effect, then the TPR is satisfied.

In this case, because the change in zoning is consistent with the comprehensive plan, the applicable portion of the TPR is OAR 660-012-0060(9), which is quoted below in italics.

¹ *Iseli Estates Subdivision*, Transportation Impact Study, dated February 18, 2022, by Lancaster Mobley

660-012-0060 Plan and Land Use Regulation Amendments

(9) Notwithstanding section (1) of this rule, a local government may find that an amendment to a zoning map does not significantly affect an existing or planned transportation facility if all of the following requirements are met.

(a) The proposed zoning is consistent with the existing comprehensive plan map designation and the amendment does not change the comprehensive plan map;

(b) The local government has an acknowledged TSP and the proposed zoning is consistent with the TSP; and

(c) The area subject to the zoning map amendment was not exempted from this rule at the time of an urban growth boundary amendment as permitted in OAR 660-024-0020(1)(d), or the area was exempted from this rule but the local government has a subsequently acknowledged TSP amendment that accounted for urbanization of the area.

As established above, the proposed R-8.5 and R-15 zoning designations both implement the comprehensive plan designation of Low Density Residential, and no change is necessary to the comprehensive plan map.

Clackamas County does have an acknowledged Transportation System Plan (TSP) and as explained below, the proposed zoning is consistent with the TSP. The site is very close to the City of Happy Valley, which also has an acknowledged TSP that includes the transportation system surrounding this site. As explained below, the City of Happy Valley's TSP already plans for the level of growth proposed for the site.

Lastly, the site was not exempted from the TPR at the time of the Urban Growth Boundary amendment that brought this site into the urban area.

Clackamas County Transportation System Plan

Clackamas County staff pointed out that the TIS only addressed conditions at site build out in 2025 but did not evaluate the transportation system through the horizon year of 2033 that is considered in the County's comprehensive plan. Staff provided the following excerpt from Chapter 5 of the comprehensive plan.

The Clackamas County Transportation System Plan (TSP) will guide transportation related decisions and identify the transportation needs and priorities in unincorporated Clackamas County from 2013 to 2033.

Chapter 5 of the comprehensive plan is the County's TSP. The comprehensive plan designates this site as Low Density Residential. Table 4-1 of the comprehensive plan shows that both R-8.5 and R-15 are zoning districts that implement the Low Density Residential designation.

As such, the proposed zone change and the resulting subdivision, are consistent with Clackamas County's TSP. Any increase in trips through the planning horizon as a result of the change in zoning is already accounted for in the TSP.

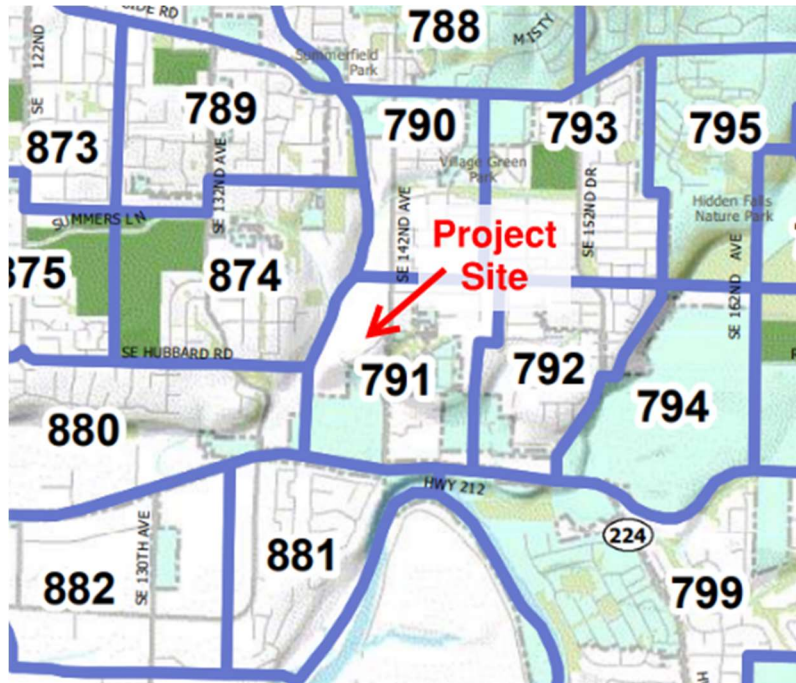


City of Happy Valley Transportation System Plan

While this site is not in the City of Happy Valley and the Clackamas County land use regulations and TSP are what is applicable to the application, it is also important to note that the City of Happy Valley's TSP also plans for growth in this area, consistent with the change in zoning.

The City's TSP divides the area into many Transportation Analysis Zones (TAZ) and each zone has separate assumptions for growth in households and employment based on the underlying comprehensive plan designation. The subject site is included in TAZ 791, which is shown in the below excerpt from Figure 4-2 of the City of Happy Valley TSP.

According to growth projects in the City's TSP, TAZ 791 (of which the site is only a part) is planned to experience a growth of 290 households over the planning horizon. The proposed Iseli Estates adds only 40 single-family homes and is well within the expected growth within the TAZ. In fact, based on the land area and the allowed zones that implement the comprehensive plan designation, it is likely that this site was assumed to accommodate more of the planned growth within the TAZ than what is proposed.



Excerpt from Figure 4-2, City of Happy Valley TSP

Summary & Conclusions

As demonstrated in this memorandum, the proposed zone change is consistent with the comprehensive plan and both the Clackamas County and City of Happy Valley TSPs assume development on this site consistent with what is proposed.

The TPR is satisfied and each of the three subsections of OAR 660-012-0060(9) are met. As such, no additional transportation analysis is necessary to meet the applicable approval criteria.

