

Memorandum

To: **Ben Blessing, Clackamas County Planning**
Christian Snuffin, Clackamas County Transportation Engineering

Copy: **Chris Goodell, AKS Engineering & Forestry**
Nathan McCarty, AKS Engineering & Forestry

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

Date: **June 13, 2022**

Subject: **Iseli Subdivision (14917 SE 142nd Avenue) – Transportation Impact Study Addendum #2**

Introduction

This memorandum is written to respond to comments received from Clackamas County planning and engineering staff, made in response to the Transportation Impact Study Addendum #1, dated June 9, 2022. That memo presented Transportation Planning Rule (TPR) findings via “Section 9¹” of the TPR, where a zone change is proposed that is in conformance with the comprehensive plan.

Transportation Planning Rule: Section 9

County staff felt that Section 9 of the TPR was not applicable, primarily due to the existing zoning designation of the portion of the site that that is FU-10, and given that zoning, the Transportation System Plan (TSP) accounted for development consistent with the subdivision this is currently proposed concurrently with the zone change.

While there are three subsections of 660-012-0060(9) that must be satisfied, the primary test is in subsection (a):

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

As demonstrated in Addendum #1, the proposed zoning is clearly consistent with the comprehensive plan and no changes to the comprehensive plan are proposed. This criterion is satisfied. This is important because the *existing* zoning designation is not relevant to the satisfaction of the Section 9 criteria. When a TSP is developed, it follows the comprehensive plan designation of properties, not the current zoning designation. This is appropriate because the TSP is part of the complete comprehensive plan. In Clackamas County, the TSP is Chapter 5 of the comprehensive plan.

For these reasons, we respectfully disagree that Section 9 is not applicable. We believe that it does apply and is clearly satisfied.

¹ Oregon Administrative Rules, section 660-012-0060(9)

Transportation Planning Rule: Oregon Highway Plan

In addition to 660-012-0060(9), there is another method that is commonly used to evaluate the TPR and whether or not an application has a significant effect on the transportation system. Contained within the *Oregon Highway Plan*² (OHP) is Policy 1F, the Highway Mobility Policy. This policy is in place to establish mobility targets and to also guide considerations relative to the TPR.

Action 1F.5 of the OHP provides implementation of the Highway Mobility Policy as it relates directly to the TPR. Contained in 1F.5 is a definition for a “small increase” in traffic between an existing adopted plan and an amendment. The following is the primary definition of a small increase, which 1F.5 allows will not cause further degradation of the transportation system, thereby avoiding a significant effect.

Any proposed amendment that does not increase the average daily trips by more than 400.

The proposed subdivision consists of 40 dwelling units, which will generate a total of 378 average daily trips as shown in the original Transportation Impact Study³. The current zoning of the site contains approximately 5.59 acres of R-15 zoning, so the net increase in trips resulting from the zone change would be even less, accounting for the trip generation potential of the existing zoning designation. Clearly, the project will not exceed the trip threshold specified by Action 1F.5 of the OHP.

Summary & Conclusions

As demonstrated in Addendum #1 and in this memorandum (addendum #2), the proposed zone change will not significantly affect the transportation system and the TPR is satisfied. This finding can be made via both of the following applicable standards:

1. Each of the three subsections of OAR 660-012-0060(9) are met, and
2. The net increase in trip generation due to the zone change will not exceed the threshold of 400 average daily trips contained in Action 1F.5 of the OHP.

² 1999 Oregon Highway Plan, published and adopted by the Oregon Department of Transportation

³ *Isele Estates Subdivision*, Transportation Impact Study, dated February 18, 2022, by Lancaster Mobley

