

CLACKAMAS COUNTY BOARD OF COUNTY COMMISSIONERS

Policy Session Worksheet

Presentation Date: 2/19/2019 **Approx. Start Time:** 2:30 p.m. **Approx. Length:** 30 mins.

Presentation Title: Letter of Recommendation for Oregon City School District UGB Expansion Request

Department: Planning and Zoning Division, Department of Transportation and Development (DTD)

Presenters: Jennifer Hughes, Planning Director and Martha Fritzie, Senior Planner

Other Invitees: Dan Johnson, DTD Director and Cheryl Bell, DTD Assistant Director of Development

WHAT ACTION ARE YOU REQUESTING FROM THE BOARD?

To authorize the Planning Director to provide a letter of recommendation for the Oregon City School District's application to Metro for an urban growth boundary (UGB) amendment to include approximately 32 acres for a new middle school.

EXECUTIVE SUMMARY:

The Oregon City School District plans to submit an application to Metro to expand the urban growth boundary (UGB) by approximately 32 acres north of and adjacent to Holcomb Elementary School, to construct a new middle school which would replace an existing middle school. The property is located on Forsythe Road, in unincorporated Clackamas County and is adjacent to the City limits of Oregon City and the UGB. One of the submittal requirements for the application is a statement from the governing body with land use jurisdiction (or its designee) recommending approval or denial of the application. Alternatively, if the County has a policy not to comment on major UGB amendments or does not provide a statement within 120 days of the applicant's request, the Metro Council may waive the requirement. Attached is the School District's request for a letter of support, including a description of the UGB expansion proposal.

Metro's review of this UGB amendment will take place through a public hearing process this spring/summer. The School District has not provided a completed application as of this date, but it is expected that their application will address all the applicable approval criteria in the Metro Urban Growth Management Functional Plan (MUGMFP) for a "Major Amendment" to the UGB. Among other analyses, the MUGMFP requires an analysis of potential alternative sites that are already inside the UGB or in an urban reserve. The property subject to this application is "undesignated", meaning it is not located in either an urban or rural reserve.

The City of Oregon City's Commission met on Feb 6, 2019, to discuss a similar letter for this application. At this meeting, the Commission voted to authorize a letter of support, with a condition that the property only be used for a middle school and that the property be removed from the UGB if construction of the middle school is not approved by the city within 10 years.

Preliminary feedback from Metro staff and the County's Transportation Engineering Division has identified several areas of concern, including:

- Whether Forsythe Road, which is a 2-lane rural arterial with a number of 90-degree turns adjacent to the site, will be adequate to serve the type of development proposed. Forsythe Road is under County jurisdiction, and presumably the County would have some input in the City of Oregon City's review of a school development on the subject site; however, whether the County could restrict or condition access to Forsythe Road in the context of a future land use application is unknown;
- Whether the proposal can meet the criteria that the development "cannot be reasonably accommodated on land already inside the UGB", particularly given the fact that there is a fairly large supply of land outside the city limits of Oregon City, but within the UGB;
- The fact that the property is not located within an urban reserve. Metro is required to consider the urban reserves first, before considering undesignated land for inclusion into the UGB, and therefore the applicant will need to also provide a justification that the development could not be reasonably accommodated on land in an urban reserve.

At this point, however, these concerns are based on preliminary conversations, not an actual review of the components of the application. The analysis of how the proposal complies with the Metro Code will occur in a public review process, and a determination of compliance with the appropriate criteria for the expansion is ultimately the decision of the Metro Council.

FINANCIAL IMPLICATIONS (current year and ongoing):

Is this item in your current budget? N/A

What is the funding source?

STRATEGIC PLAN ALIGNMENT:

- How does this item align with your Department's Strategic Business Plan goals?

The proposal aligns with the Long-Range Planning program's purpose of providing land use and transportation plan development, analysis, coordination and public engagement services to residents; businesses; local, regional and state partners; and County decision-makers so they can plan and invest based on a coordinated set of goals and policies that guide future development.

- How does this item align with the County's Performance Clackamas goals?

The proposal aligns with the Performance Clackamas goal to Build Public Trust through Good Government. By providing the letter of recommendation, the County is responding to a request from the School District and ensuring compliance with a Metro Code requirement. Coordinating processes between units of government is essential to building public trust.

LEGAL/POLICY REQUIREMENTS:

Per Metro Code, applications to add land to the UGB under the Major Amendment process are accepted once a year (Feb 1- March 15) and only for the following purposes: public facilities and services, public schools, natural areas, land trades and other non-housing needs. As part of this application, the applicant must submit a statement from all current service providers and from the entity which currently has land use jurisdiction over the properties, which in this case is

Clackamas County. This statement may recommend approval or denial on the proposed UGB amendment. The governing body may also delegate the decision to its staff. As noted above, if the County has a policy not to comment on major UGB amendments or does not provide a statement within 120 days of the applicant's request, the Metro Council may waive the requirement. The County has not previously established a policy of no comment.

The letter requested is simply a "service provider" statement; it is not intended to assess the proposal against all of Metro's criteria. To meet the application deadline, the County should provide a statement to the School District before March 15th.

PUBLIC/GOVERNMENTAL PARTICIPATION:

The proposed letter of recommendation is a requirement of the application the School District plans to submit and does not warrant any public participation at the County level. Metro's review of this UGB amendment will take place through a public hearing process in spring/summer 2019. If Metro approves the UGB amendment, the property would then need to go through a public hearing process to annex to the city, then through a development review process, which would also allow for public input.

OPTIONS:

- (1) Authorize the Planning Director to provide the requested letter recommending approval of the proposal. The County's letter could include a statement that this support would be conditioned upon the School District demonstrating to Metro that there are no reasonable alternative sites already within the urban growth boundary, or within the urban reserves.
- (2) Authorize the Planning Director to provide a letter recommending denial of the proposal. This would be an appropriate option if the Board feels strongly that it does not have sufficient information to support the proposal or that the proposal is counter to the intent of the urban reserves.
- (3) Do nothing. Metro's regulations give the Metro Council the discretion to process an application without a letter from the County if the County either has a policy not to comment on such requests or simply has not responded to a request within 120 days. However, the timing of the applicant's request for the statement of recommendation relative to the timing of the Metro review process is somewhat confusing regarding how the 120-day period would play out in this case.

RECOMMENDATION:

Staff recommends the Board authorize Option (1), with the statement that the recommendation of approval is conditioned upon the School District demonstrating to Metro that there are no reasonable alternative sites already within the urban growth boundary, or within the urban reserves. Ultimately the analysis of the sufficiency of the School District's application is up to Metro.

ATTACHMENTS:

- Request for Board of County Commissioners support for UGB amendment; Brad Kilby, Senior Planner, Harper Houf Peterson Righellis Inc.

SUBMITTED BY:

Division Director/Head Approval

A handwritten signature in cursive script, appearing to read "Jennifer Hughes", written over a horizontal line.

Department Director/Head Approval

County Administrator Approval

For information on this issue or copies of attachments, please contact Martha Fritzie @ 503-742-4529

February 4, 2019



Via Email

Clackamas County Board of Commissioners
Honorable Chair Jim Bernard
c/o Jennifer Hughes, Long Range Land Use Planning Manager
2051 Kaen Road
Oregon City, OR 97045

**RE: Request that Clackamas County Board of County Commissioners
Support Submittal of an Application by the Oregon City School
District No. 62 to Expand the Portland Metropolitan Area Urban
Growth Boundary to Include the Property for a New Middle School**

Dear Chair Bernard and Members of the Clackamas County Board of Commissioners:

The Oregon City School District No. 62 (the "School District") has an option to purchase property (the "Property") owned by the Serres family containing about 32 acres (**Exhibit 1**). The Property is located on Forsythe Road just north of Holcomb Elementary School. The Property is located adjacent to the City of Oregon City's (the "City") municipal boundary and is in unincorporated Clackamas County. The property is currently zoned Future Urban-10 (FU-10), but is neither urban or rural reserve; however, there are City services stubbed to the property, and there are plans for future extensions of urban services within the City's long range facilities plans to support service of the portion of area that is inside the Urban Growth Boundary (the "UGB").

The Metro Code allows an amendment to the Portland Metropolitan Area UGB for certain public purposes, including schools. This type of UGB amendment requires that the applicant include a written statement from the City and the County as to their position on the UGB amendment. The Oregon City Commission will be considering a resolution to conditionally support the request provided the land is only developed with a school at their meeting on February 6, 2019. The District is not asking the Board of County Commissioners to give any approvals for future land use applications.

The remainder of this letter answers questions that the Board of County Commissioners may ask in considering this request.

1. Why is the School District making this request?

The School District is planning for its long-term needs. The School District plans to relocate Ogden Middle School to the Property because the current Ogden Middle

School does not meet the School District's preliminary educational specifications for middle schools. Given the complexities of planning for, financing and developing the middle school, the School District determined that it needed to begin the process now. After examining its needs and future needs and reviewing property available to it both inside and outside the city, the School District approached the Serres family about purchasing the Property.

As **Exhibit 1** shows that the Property is adjacent to Holcomb Elementary School and the City boundaries. If a UGB amendment is approved, the School District will ask the City to annex the Property and will then submit a conditional use permit to construct the middle school.

The School District considered whether it could construct the school outside of the UGB and the City and in the County. The principal reason that it cannot do so is that there are express prohibitions that do not allow the extension of City services outside of City limits except in cases of public health emergencies. The new middle school will require City water and sanitary sewer service (it is not possible to construct the school with a septic system) and the Metro Code prohibits annexation of property outside of the UGB. Therefore, in order to further consider the Property for development as a middle school, the Property must be within the UGB and eventually inside the City. However, the only proposal currently before the Board of County Commissioners is the request to support the UGB amendment.

2. Why was this property chosen?

The Property was chosen for a number of reasons. First, this Property's topography is flat enough to allow development. Second, the Property is large enough (about 32 acres) to accommodate a middle school and recreational facilities. The School District's preliminary specifications list middle schools as community recreational hubs open to the public and focused on youth sports in Oregon City and the surrounding area. This Property is large enough to accommodate several ball fields and a full size track and football field.

The Property is immediately adjacent to Holcomb Elementary School. The School District will be able to develop a unified campus with connections between the elementary school and the new middle school.

Finally, the Property is located within proximity to the north part of the district where the majority of the student population would be expected, and adjacent to the city boundary and to city services. Assuming that the Property is included in the UGB and eventually annexed to the city, the School District can easily extend City water and sanitary sewer services to the Property.

3. What traffic impacts will the new middle school have?

The School District retained Lancaster Engineering to perform a high-level traffic analysis. Lancaster has determined that the surrounding transportation system should be able to accommodate expected vehicle trips to the middle school. Most middle

school students will travel by bus, or their parents will bring them, to the middle school. To the extent street improvements are needed because of the middle school, those will be determined in the conditional use permit process and the School District will be obligated to make such improvements. Further analysis is both required and appropriate during each step of the local annexation, comprehensive plan and zone change amendment and permitting stages.

4. What is the timeline for the new middle school's development?

The School District expects the UGB amendment process to take up to a year, followed by an annexation, zone change, Comprehensive Plan designation, site plan and design review, and a conditional use permit which, collectively, may take between one and two years to complete. If those approvals comply with the relevant criteria, the School District would be in a position to seek financing for the school and then to construct it. The School District believes the new middle school will be open in the next seven to ten years.

5. Can the middle school be developed on School District owned property inside the City?

Part of the Metro process requires the School District to analyze opportunities for development of the school within the existing UGB. The School District is preparing an application to submit to Metro. The initial findings looking at other available lands conclude that no 32-acre site with appropriate topography is available within either the UGB or the City. Furthermore, the reason that this site is available is that while it is not included within "Urban Reserves," it is also not included within "Rural Reserves." The property is "Undesignated." Under Metro and state law, the UGB can be amended to include Undesignated land.

6. What about citizen involvement?

The School District intends to hold several meetings with its stakeholders, neighborhood groups and other interested citizens once it submits the UGB amendment application. Interested parties will have an opportunity to participate in the UGB expansion process as well as the city processes necessary to allow development.

7. What about other City services?

If the requests are approved, the City will provide sanitary sewer, transportation, police and park services to the middle school.

The School District will seek separate support from the Clackamas Fire District and Tri-Met for their respective services.

8. Why is this request being made now?

As noted above, the School District must begin work on the UGB amendment now. The Metro Code requires that a UGB amendment be submitted no later than March 15. The



School District has asked the Commissioners to consider this matter in February so that there is ample opportunity for the School District to answer any questions and the Board of County Commissioners to give an affirmative response to the request.

9. What are the next steps?

The School District understands that neither the County nor the City has evaluated the service and facility extension demands placed on the City through this proposal. Rather, at this point, the School District is only asking that the both jurisdictions execute a resolution supporting this request and committing to participate in the Metro expansion process.

The School District, the School District's land use consultant and I look forward to meeting with you and answering any questions that the Board of County Commissioners may have.

Very truly yours,

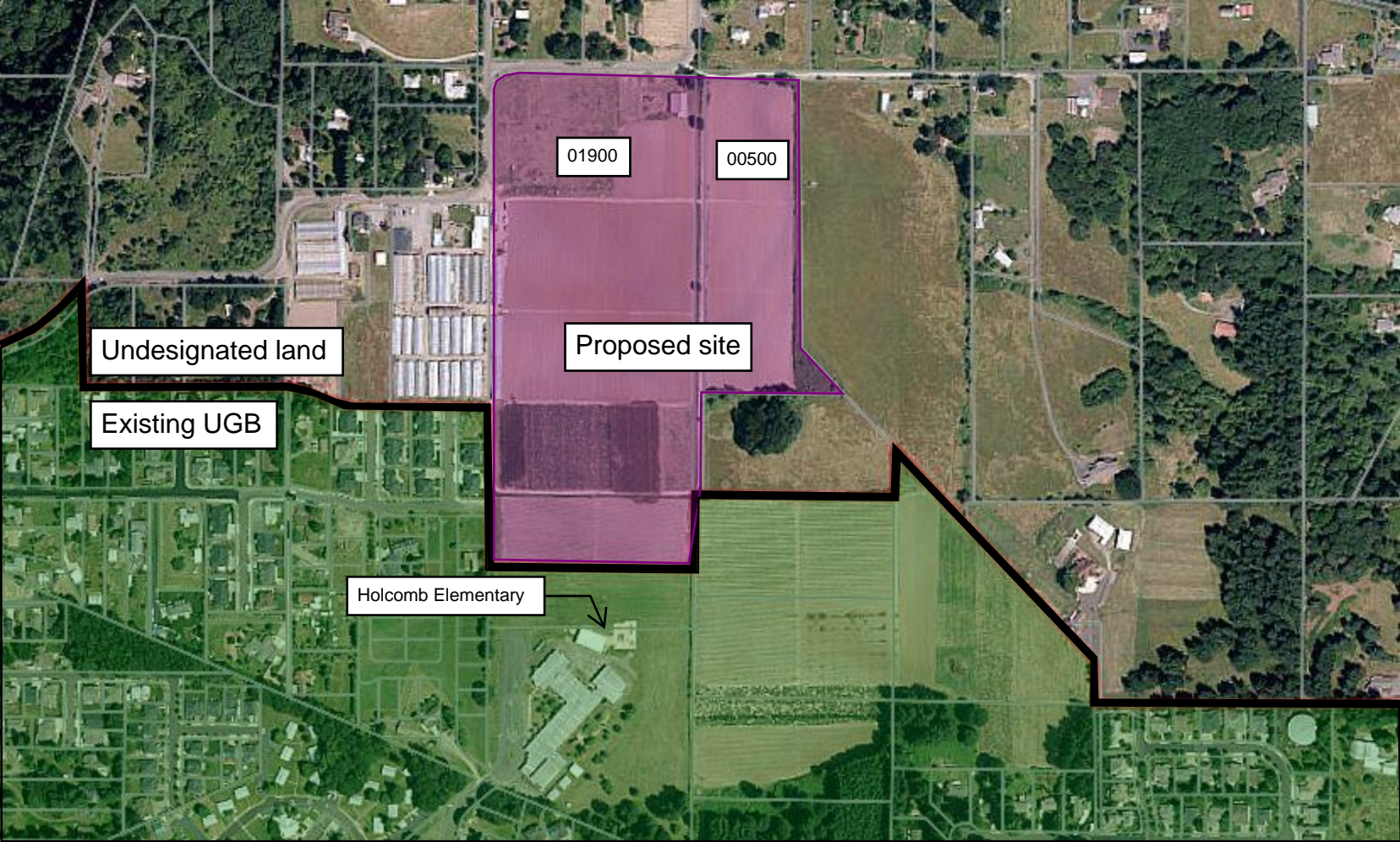
A handwritten signature in cursive script, appearing to read "Brad Kilby".

Brad Kilby, AICP
Senior Planner

Enclosure

Exhibit 1 – Location of the property in question

Exhibit 2 – Preliminary Traffic Analysis from Lancaster Engineering



01900

00500

Undesignated land

Existing UGB

Proposed site

Holcomb Elementary

Memorandum



**LANCASTER
ENGINEERING**

To: Wes Rogers, Oregon City School District
From: Todd E. Mobley, PE
Date: November 25, 2018
Subject: Ogden Middle School UGB Expansion
Preliminary Transportation Assessment

321 SW 4th Ave., Suite 400
Portland, OR 97204
phone: 503.248.0313
fax: 503.248.9251
lancasterengineering.com

Introduction

This memorandum is written to provide the results of a preliminary transportation analysis examining the potential impacts and benefits associated with relocating Ogden Middle School to a site directly north of the existing Holcomb Elementary School. The project would require an amendment to the Portland Metropolitan Urban Growth Boundary (UGB) and annexation into the City of Oregon City.

The existing Ogden Middle School is located at 14133 S Donovan Road in Oregon City. The school has a relatively large attendance boundary, serving areas in the northeast portion of the City of Oregon City as well as residents in unincorporated Clackamas County to the north, east, and south of the city. The current attendance boundary for the school is shown in Figure 1 below.

The location of the proposed new Ogden Middle School site is at tax lot number 22E21D 01900, which is a 24.55-acre parcel immediately north of the existing Holcomb Elementary School. The location of the existing middle school, the proposed new location, and Holcomb Elementary are all shown in Figure 2 on the following page.

Access to the new school would be available via Forsythe Road as well as through Holcomb Elementary, which takes access to Holcomb Boulevard. There would be cross access between the schools, which will help disperse traffic impacts and allow shared facilities between the elementary school and the middle school on the campus. This is discussed in more detail below.

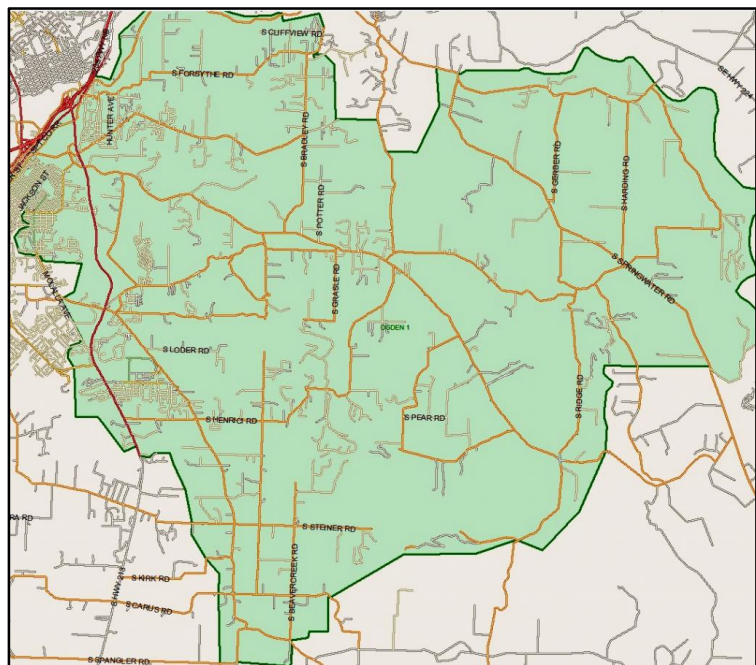


Figure 1 - Ogden Middle School Attendance Boundary



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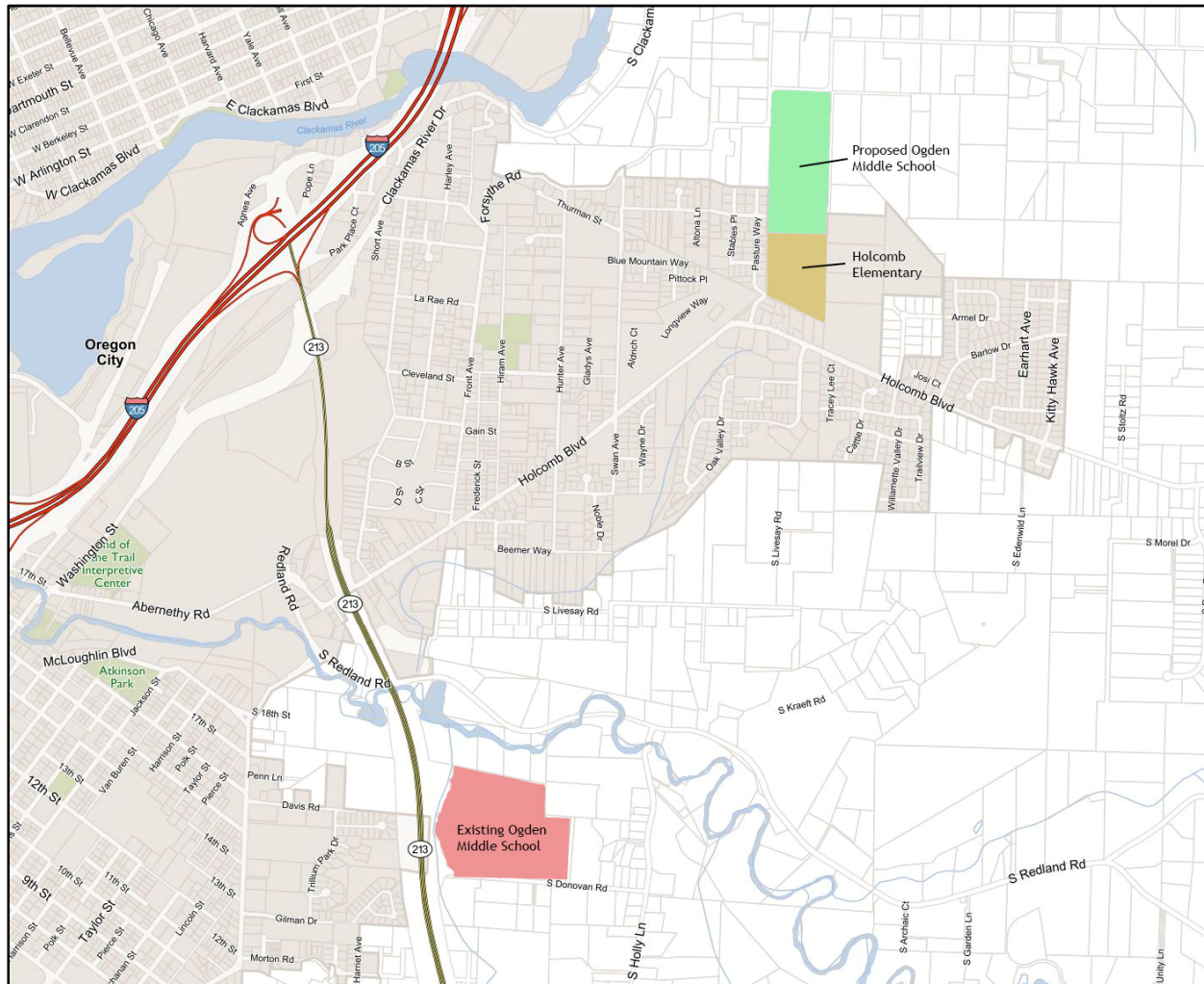


Figure 2 - Vicinity Map & School Locations

Benefits of Co-Located Schools

A key criterion in the search for a new site for Ogden Middle School is to co-locate the school on a common campus with another Oregon City School District facility. This co-location provides several benefits for the schools with the ability to share resources such as sports and play fields, large common areas such as auditoriums and gymnasiums, and parking supply. Careful scheduling of the school day as well as extracurricular events avoids concentration of traffic impacts and allows the District significant benefit from the shared resources.



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Lancaster Engineering has worked recently with multiple school districts who have located two schools either on a common campus or in very close proximity. This includes the following school districts: Oregon Trail, North Clackamas, Scappoose, Seaside, and Warrenton.

Trip Generation & Distribution

Trip generation for schools is commonly estimated using data in the Trip Generation Manual, which is an industry-standard reference manual that is published by the Institute of Transportation Engineers (ITE). However, in this case Lancaster Engineering has conducted previous studies at both the existing Ogden Elementary School and at Holcomb Elementary. This allows us to examine the trip generation of the schools based largely on actual traffic count data rather than relying only on data from similar facilities in the ITE manual. It is worth noting that the traffic counts yield trip generation results that are very close to the published ITE rates.

Note that the trip generation reported in the table below does *not* include any reductions that may be appropriate based on the two schools being co-located on a common campus. Each school is currently stand-alone and is not adjacent to another school.

The morning and afternoon peak hours shown below coincide with the start of school in the morning and school release in the afternoon. This is usually the one-hour peak between 7:00 and 9:00 AM and between 2:00 and 4:00 PM. The evening peak hour reflects the peak of adjacent street traffic, most commonly the peak of commuter traffic, which is usually the one-hour peak between 4:00 and 6:00 PM. During the evening peak hour, school trip generation is significantly lower and is usually from extracurricular activities and staff.

Table 1 - Trip Generation Summary

	Morning Peak Hour			Afternoon Peak Hour			Evening Peak Hour		
	(School Arrival & Commuter Peak)			(School Release, Before Commuter Peak)			(After School Hours, Commuter Peak)		
	In	Out	Total	In	Out	Total	In	Out	Total
Existing Ogden Middle School ¹	237	209	446	122	147	269	64	67	131
Existing Holcomb Elementary ²	193	144	337	57	95	152	26	20	46

¹ Based on traffic counts and impact study from 2012 when current modular classrooms were added. Evening peak hour data is estimated based on data from the ITE Manual since traffic counts were not available.

² From 2014 traffic counts conducted for the adjacent residential subdivision.



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It is important to note that trips generated by Ogden Middle School are already on the transportation system. Construction of a new school would not result in an increase in trips to the system as a whole but will change trip routes and impacts to intersections near the site. Also, access to both Holcomb Boulevard and Forsythe Road will avoid concentrating traffic impacts on one facility. Potential offsite traffic impacts are addressed in the following section.

Potential Offsite Impacts

Currently, all Ogden Middle School trips use Holly Lane to reach the school on Donovan Road. Traffic count data at the intersection of Donovan Road and Holly Lane shows that approximately 60 percent of the current school trips are to and from the north, via Redland Road. The remaining 40 percent are to and from the south via Maplelane Road.

Access Location

The proposed site for the relocated Ogden Middle School has frontage on Forsythe Road. That, together with access to Holcomb Boulevard through the Holcomb Middle School campus, will serve to disperse traffic impacts. The Oregon City Transportation System Plan (TSP) classifies Holcomb Boulevard as a Minor Arterial and Forsythe Road as a Collector. Both are of appropriate classification to carry school traffic.

Further analysis of offsite roadway and intersection impacts would be necessary as part of the UGB expansion but having access to both facilities gives the District the ability to control routes to and from the site and to disperse traffic impacts. Since Holcomb Boulevard connects to Redland Road to reach Highway 213 and Forsythe Road connects to Clackamas River Drive to reach Highway 213, each route would have significantly different impacts to the transportation system.

School Schedules

Operating two schools on a common campus would require a staggered schedule to avoid concurrent peaks in trip generation. In our experience, the stagger can range from 15 minutes to two hours. Often, this depends on logistics of busing students to school and whether the bus schedules and capacities allow the two schools to share busing. Some districts with a shorter stagger (such as Oregon Trail) can share busing, and other districts with a longer stagger (such as North Clackamas) bus each school separately.

Currently, Ogden Middle School and Holcomb Elementary have a 50-minute stagger. Due to bus scheduling and capacities, each of the two schools are bused separately. It is expected that this practice would continue at the new location, which would provide more than ample separation between the two school peaks. Figure 3 below shows an example of traffic volumes gathered in Happy Valley for co-located elementary and middle schools that have a one hour and forty-five-minute schedule stagger.

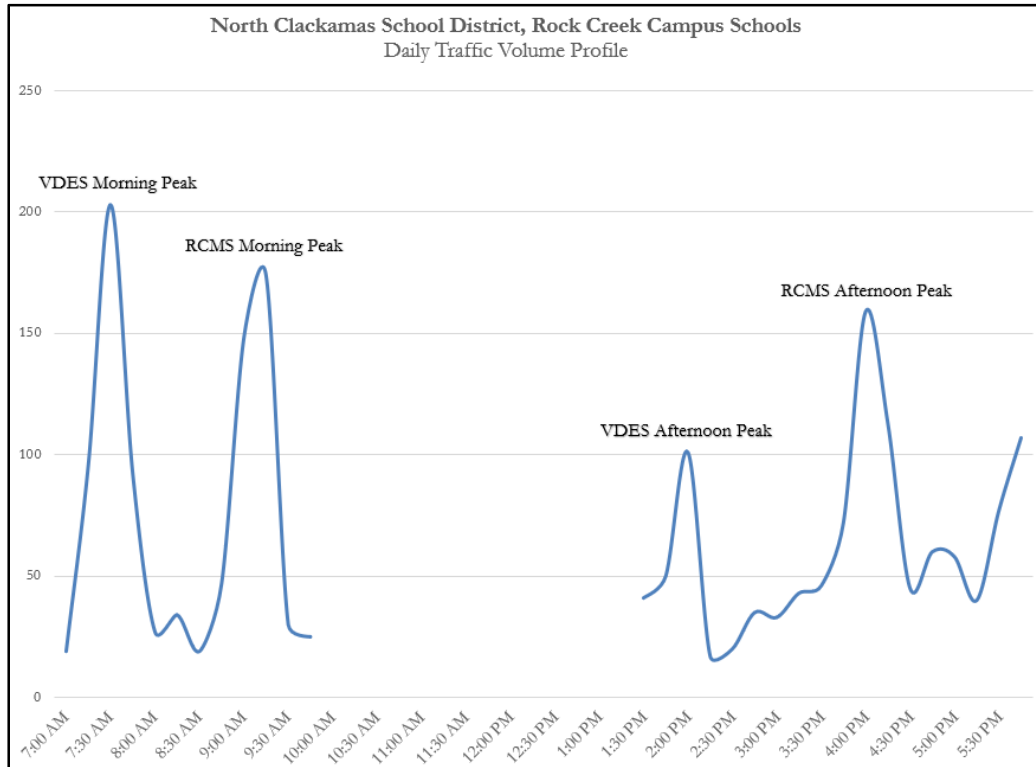


Figure 3 - Example of Elementary & Middle School Staggered Schedule

Safe Routes to School

Perhaps the single-biggest contributor to traffic impacts and congestion associated with schools is the number of parents that drive their children to school. In Ogden Middle School's current location, virtually all students are either bused to school or dropped off by parents, since there is no pedestrian or bicycle infrastructure that would provide a safe route to and from the school.

With developing residential neighborhoods to the west and south of the proposed school site that provide newly constructed complete streets, there will be a number of safe routes to the school. In addition, there is considerable growth in residential neighborhoods anticipated immediately south of the site. In fact, the area to the south and the east of the site is in the highest category of anticipated future growth, as identified in the TSP. This is illustrated in **Error! Reference source not found.** below, which is an excerpt from the adopted TSP.

Notice in the figure, that the proposed location of Ogden Middle School will be in much closer proximity to anticipated growth than the current site. This will significantly increase the number of students that could safely walk and bike to school in the long term.

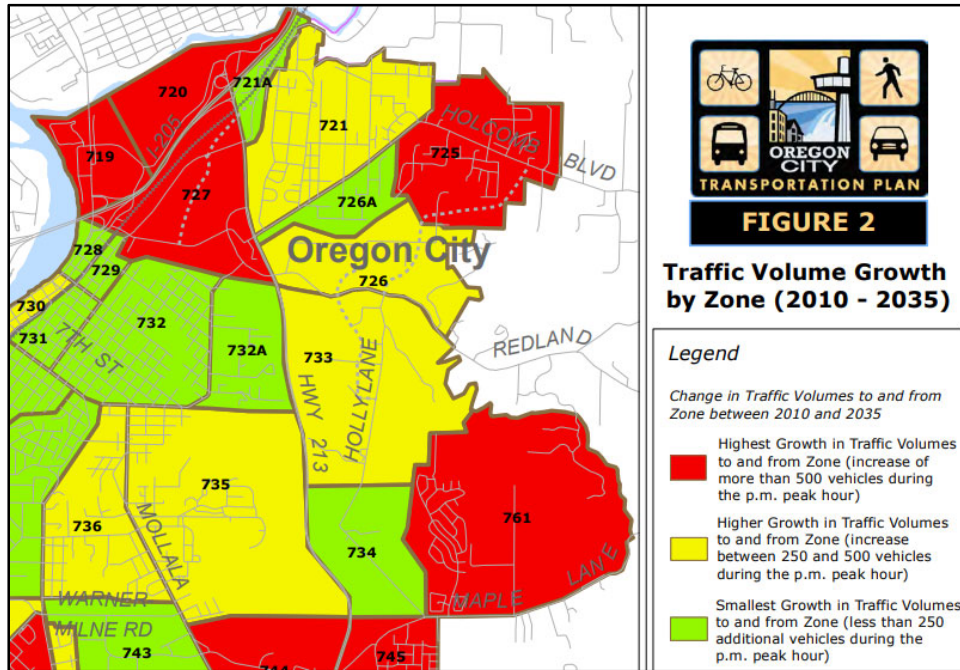


Figure 4 - Anticipated Future Growth

In addition, there is significant growth planned south of Holcomb Boulevard. Currently, the posted speed on Holcomb Boulevard is 40 mph and, in some locations, travel speeds are often significantly higher. As the area continues to develop and the character of the roadway and the neighborhood changes, it will likely be appropriate to reduce the speed zone.

As speeds reduce, it is recommended that additional pedestrian and bicycle infrastructure be considered that would provide a safe crossing for pedestrians and bicycles. For example, an enhanced crossing near Holcomb Elementary would provide an important link between the residential neighborhoods south of Holcomb Boulevard and the school campus to the north.



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Summary & Conclusions

Based on this preliminary analysis, it is reasonable to expect that the proposed UGB amendment and Ogden Middle School relocation could be supported by the existing and planned transportation system. The following are key considerations that support this conclusion.

1. Schools generate fewer trips during the evening peak hour, which is nearly always the critical peak hour and what is examined and planned for in the City's TSP.
2. Trip generation of the school is dependent upon the number of residential dwelling units within the attendance boundary. Therefore, the UGB amendment for the school would not result in an overall increase in trip generation for the city, which would be the case if the UGB were being expanded for other land uses.
3. A staggered schedule is recommended to avoid the traffic congestion that would result if both the elementary and middle schools started and ended at the same time. Currently, bus schedules and capacities dictate a stagger of 50 minutes, which would easily avoid overlapping traffic impacts.
4. Access to either Forsythe Road and/or Holcomb Boulevard should be carefully managed in order to control traffic impacts to offsite roadways and intersections. Further analysis of roadway width and geometry will be required to determine the suitability of Forsythe Road to carry additional school bus traffic.
5. By co-locating Odgen Middle School and Holcomb Elementary, there are a number of efficiencies that could be realized, resulting in reduced transportation impacts when compared to two separate stand-alone facilities.
6. With targeted infrastructure improvements that would serve people walking or biking, the number of students who could safely walk or bike to school could be increased significantly when compared to the current schools.