

STAFF REPORT TO THE PLANNING COMMISSION

To: Clackamas County Planning Commission

From: Steve Williams, Principal Planner

Date: August 22, 2022

RE: File ZDO-284: *Amendments to Comprehensive Plan Chapter 5 Transportation System Plan for the Damascus Mobility Plan*

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BACKGROUND

Clackamas County most recently updated the county Transportation System Plan (TSP) in 2013. At the time, Damascus was an incorporated city. When Damascus dis-incorporated in July 2016, all adopted city plans were eliminated and it became necessary for Clackamas County to develop and adopt plans consistent with county policy for the area of the former city. The *Damascus Mobility Plan* is intended to present changes to the street system within the area of the former city to support existing county land use designations and regional growth through the 2045 planning horizon. It should be noted that in addition to the *Damascus Mobility Plan*, the county has previously developed and adopted the *Clackamas County Transit Development Plan* that focuses on transit needs and the *Clackamas County Active Transportation Plan* that addresses pedestrian and bicycle system needs. These modal plans addressed the entire unincorporated area of the county including the area of the previous city.

THE DAMASCUS MOBILITY PLAN

- The *Damascus Mobility Plan* is intended to: Address gaps in the 2013 Clackamas County Transportation System Plan (TSP) for the unincorporated areas that were previously in the City of Damascus.
- Identify street and intersection changes needed to address near- and long-term vehicular and freight congestion and safety needs. These changes reflect traffic growth associated with land development consistent with the County Comprehensive Plan as well as overall regional growth.
- Address vehicular congestion and identified safety issues at key intersections along the OR 212 corridor between SE 187th Avenue and SE 242nd Avenue and incorporate ODOT proposed improvements to the OR 212 intersections into the *Damascus Mobility Plan*.
- Coordinate with other County planning efforts for the area that identify the needs of people walking, riding bikes and taking transit. Two key plans supporting this plan are the County's Transit Development Plan and Active Transportation Plan.

A printed copy of the *Damascus Mobility Plan* has been provided to the members of Planning Commission in their meeting packet. Additional detail on the development of the Damascus Mobility Plan can be found on the project webpage at [Damascus Mobility Plan | Clackamas County](#)

The *Damascus Mobility Plan* has seven chapters including an executive summary and an introduction; description of the public involvement for the plan and the feedback received; description of existing transportation system conditions; anticipated future conditions; project development including the alternatives analysis; and the OR 212 intersection refinement study. The *Damascus Mobility Plan* includes the list of proposed projects and an analysis of the Year 2040 Build Intersection Operations.

The *Damascus Mobility Plan* was created in partnership with ODOT and Happy Valley. At the same time this project was underway, Happy Valley was creating the Pleasant Valley North Carver Plan which provided guidance on the urbanization of the area extending from the existing Happy Valley limits east to approximately SE 187th Ave. Since the area east of SE 187th is not currently being planned for urban uses, the *Damascus Mobility Plan* focuses on the roadway improvements that are needed to support the current rural development in the county unincorporated area.

A five-step process was used to identify the improvements proposed in the *Damascus Mobility Plan*:

1. Identification and documentation of existing conditions related to vehicular transportation and traffic, including an analysis of operations at 17 intersections using traffic volume and delay data collected pre-pandemic in April 2019, and a safety assessment for the five-year period from January 1, 2015 to December 31, 2019.
2. Study of future conditions that included the preparation of population forecasts based on the County's Zoning and Development Ordinance (ZDO) and Metro's 2045 Population and Employment Forecasts.
3. Development of a project list for the Damascus area. The project list was developed through two distinct efforts:
 - A Mobility Plan Alternatives Analysis that focused on existing and future conditions on the county roads, and
 - A study of the intersections in the OR 212 from SE 187th Avenue to SE 242nd Avenue that provided a more in-depth study of intersections of the local roads and OR 212.

There were 22 projects identified on county roads during the *Damascus Mobility Plan* process, primarily adding turning lanes at some intersections to improve intersection operations, realigning one or more roads at some intersections to align the "legs" of the intersection and improve safety, and adding shoulders on arterial and collector roads as called for in the adopted TSP and County Roadway Standards. The projects proposed on county roads can be found in Table 5-3a through c, attached, and are highlighted in yellow on attached Map 5-11a. In addition, seven regional projects proposed by ODOT and Happy Valley were identified as beneficial for traffic operations in the Damascus area and are highlighted in Table 5-3d as projects the county should support.

4. Prioritization of the 22 proposed projects on county roads into the categories used in the adopted TSP based on when the projects are needed and the availability of funding:

- **Tier 1:** Capital projects that are needed within the next 20 years and are matched with anticipated funding.
 - **Tier 2:** Preferred capital projects that are needed to meet population, housing and employment projections but that do not have identified funding at this time.
 - **Tier 3:** Long-term capital projects that would be beneficial if funding is available.
5. Public Engagement during the development of the *Damascus Mobility Plan* took place entirely during the Covid-19 pandemic. Due to the pandemic requirements, the public engagement was conducted as a virtual, online process. All materials and memoranda were posted online to improve public access to the process. County staff also used social media platforms such as Facebook and NextDoor to provide updates on the process and notices of the posting of materials. In the course of the process, two virtual open houses were conducted to provide a method for direct public input. The virtual open houses were conducted over a three-week period and included the following:
- Notification with postcards (printed in English and Spanish) mailed to every residence and business in the former city of Damascus, as well as virtual open house announcements on social media.
 - A special web page linked from the project website with surveys and input tools allowing the public to share their comments and concerns.
 - Interactive maps that enabled the public to select intersections and road segments and provide input on issues or suggestions on improvements for that location.
 - A Zoom public meeting during which the project team made a presentation and members of the public had the opportunity to ask questions and make comments.
 - The engagement process also included one virtual meeting with the Damascus Community Planning Organization (CPO) and an in-person presentation at a CPO-sponsored community meeting.

There were 604 people who visited the online open house and viewed the materials. Of those, 35 provided comments. There were 21 attendees at the Zoom public meetings. Appendix B of the *Damascus Mobility Plan* provides additional detail and copies of all the materials that were used.

In addition to public involvement, the process also included the City of Happy Valley and the Oregon Department of Transportation. A project management team was formed that included county staff, and representatives of the city and ODOT. Staff from the city and ODOT participated in all project meetings and reviewed all products and recommendations.

PROPOSED CHANGES TO COMPREHENSIVE PLAN

Ordinance ZDO-284 contains the amendments to the county's Comprehensive Plan that are needed to update the adopted Transportation System Plan to include the needed road improvement projects that were identified in the *Damascus Mobility Plan*. Adoption of the updates to the Transportation System Plan will require the following amendments to the Comprehensive Plan (attached):

1. **Updates to Tables 5-3a 20-Year Capital Projects, 5-3b Preferred Projects, 5-3c Long Term Capital Projects, and 5-3d Regional Capital Projects** to include the 22 proposed prioritized projects on county roads and the seven regional projects that were identified in the *Damascus Mobility Plan*.

2. **Updates to Map 5-11a, *Capital Improvement Plan***, which shows all the projects in the Greater Clackamas Regional Center/Industrial/Damascus Area, including those proposed to be added from the *Damascus Mobility Plan*. The projects proposed to be added in the Damascus area are color-coded to indicate the project priority and are highlighted in yellow on the attached updated Map 5-11a.
3. **Changes to the text of Comprehensive Plan, including:**
 - a. Adding the *Damascus Mobility Plan* to Appendix B, *Summary of Supporting Documents*; and
 - b. Minor text amendments to Chapter 5, *Transportation System Plan*, to ensure policies support the proposed changes to the Capital Improvement Plan. These amendments will:
 - Remove reference to the City of Damascus, and
 - Amend the definitions of “rural” and “urban” as they are used in this chapter, to clarify that within the Portland Metropolitan urban growth boundary, areas with a Comprehensive Plan designation of Agriculture, Forest, Rural, Rural Commercial, Rural Industrial or Unincorporated Community Residential, are subject to the “rural” Plan policies and roadway cross sections.

PUBLIC NOTICE & COMMENTS

Notice of the proposed amendments in ZDO-284 was sent to:

- All cities within the County;
- All County Community Planning Organizations (CPOs) and Hamlets;
- The City of Happy Valley
- DLCDC, Metro, and ODOT

Notice was also published in the newspaper and online. To date no written comments from members of the public or agencies have been received.

ANALYSIS & FINDINGS

1. Statewide Planning Goals:

This section of the report includes findings on ZDO-284’s consistency with Statewide Planning Goals.

Goal 1 – *Citizen Involvement*:

Goal 1 calls for “the opportunity for citizens to be involved in all phases of the planning process” and requires the County to have a citizen involvement program with certain features.

ZDO-284 does not propose any change to the *Citizen Involvement* chapter (Chapter 2) of the County’s Comprehensive Plan. The only Comprehensive Plan amendments proposed in ZDO-284 would be to Chapter 5, *Transportation System Plan*.

ZDO Section 1307 implements policies of Comprehensive Plan Chapter 2, and contains adopted and acknowledged procedures for citizen involvement and public notification of land use applications. Notice of ZDO-284 has been provided consistent with the

requirements of Section 1307, including to DLCD, all cities in the County, and all active and recognized CPOs and Hamlets 35 days before the first public hearing. Notice of the ordinance and its scheduled hearings was published in *The Oregonian* more than 10 days in advance and has also been posted on County websites. Before a final decision on ZDO-284 can be made, there will have been at least two public hearings: one before the Planning Commission and another before the Board of County Commissioners.

This proposal is consistent with Goal 1.

Goal 2 – Land Use Planning:

Goal 2 requires the County to have and to follow a comprehensive land use plan and implementing regulations. Comprehensive plan provisions and regulations must be consistent with Statewide Planning Goals, but Goal 2 also provides a process by which exceptions can be made to certain Goals.

ZDO-284 does not require an exception to any Statewide Planning Goal. With the ordinance's proposed amendments, the County's adopted and acknowledged Comprehensive Plan will continue to be consistent with Statewide Planning Goals, and the implementing regulations in the ZDO will continue to be consistent with those Goals and with the Comprehensive Plan.

This proposal is consistent with Goal 2.

Goal 3 – Agricultural Lands:

ZDO-284 would not amend Comprehensive Plan policies related to agricultural lands, nor would it change any property's land use plan designation or expand any UGB into agricultural lands (i.e., those zoned EFU). ZDO-284 would also not permit new land uses in agricultural lands.

This proposal is consistent with Goal 3.

Goal 4 – Forest Lands:

ZDO-284 would not amend Comprehensive Plan policies related to forest lands (i.e., those zoned AG/F or TBR), nor would it change any property's land use plan designation or expand any UGB into forest lands. ZDO-284 would not permit new land uses in forest lands.

This proposal is consistent with Goal 4.

Goal 5 – Natural Resources, Scenic and Historic Areas, and Open Spaces:

Goal 5 requires the County to have programs that will protect natural resources and conserve scenic, historic, and open space resources for present and future generations. It requires an inventory of natural features, groundwater resources, energy sources, and cultural areas, and encourages the maintenance of inventories of historic resources. ZDO-284 would not make any change to the County's Comprehensive Plan goals, policies, or inventories, or to ZDO provisions, related to the protection of natural resources, or scenic, historic, or open space resources.

This proposal is consistent with Goal 5.

Goal 6 – Air, Water and Land Resources Quality:

Goal 6 instructs the County to consider the protection of air, water, and land resources from pollution and pollutants when developing its Comprehensive Plan. The proposal would not change any Comprehensive Plan goal or policy, or implementing regulation, affecting a Goal 6 resource, nor would it modify the mapping of any protected resource.

This proposal is consistent with Goal 6.

Goal 7 – Areas Subject to Natural Hazards:

Goal 7 requires the County's Comprehensive Plan to address Oregon's natural hazards. ZDO-284 would not change the County's acknowledged Comprehensive Plan policies regarding natural disasters and hazards, nor would it modify the mapping of any hazard.

This proposal is consistent with Goal 7.

Goal 8 – Recreational Needs:

Goal 8 requires relevant jurisdictions to plan for the recreational needs of their residents and visitors. The proposal would not change any existing, state-acknowledged County Comprehensive Plan policy or implementing regulation regarding recreational needs, nor would it reduce or otherwise modify a mapped recreational resource.

This proposal is consistent with Goal 8.

Goal 9 – Economic Development:

Goal 9 requires the County to provide an adequate supply of land for commercial and industrial development. As noted earlier, ZDO-284 would not change the Comprehensive Plan or zoning designation of any property. It also would not add any new restriction to land uses in areas of the County reserved for commercial and industrial development.

This proposal is consistent with Goal 9.

Goal 10 – Housing:

The purpose of Goal 10 is to meet housing needs. ZDO-284 would neither reduce nor expand the County's housing land supply, nor would it add new restrictions to housing development.

This proposal is consistent with Goal 10.

Goal 11 – Public Facilities and Services:

The purpose of Goal 11 is to ensure that local governments plan and develop a timely, orderly, and efficient arrangement of public facilities and services to act as a framework for urban and rural development. ZDO-284 does not propose any change in adopted plans for the provision of water, sewer, or other public services.

This proposal is consistent with Goal 11.

Goal 12 – Transportation:

The purpose of Goal 12 is to ensure that the County's transportation system is adequate to serve land uses. The county is required to have a Transportation System Plan that includes the entire unincorporated area. ZDO-284 will amend the County's Transportation System Plan to incorporate recommended transportation plans and

projects within the area of the former City of Damascus, now a part of the unincorporated area of the county and subject to the county's adopted transportation plans and policies. The following amendments to Comprehensive Plan Chapter 5 Transportation System Plan are proposed:

1. **Draft updates to Tables 5-3 a-d** (updated tables attached). These tables contain the lists of the projects in the Damascus area recommended for inclusion in the TSP.
2. **Update of Map 5-11a** (updated map attached). This map shows all the projects in the Greater Clackamas Regional Center/Industrial/Damascus Area, including those proposed to be added from the Damascus Mobility Plan. The projects that are proposed to be added in the Damascus area are color coded to indicate the project priority and are highlighted in yellow on the attached updated Map 5-11a.
3. **Changes to the text of Comprehensive Plan Chapter 5:**
 - **Addition of the Damascus Mobility Plan to the Comprehensive Plan "Appendix B" Summary of Supporting Documents.**
 - **Minor amendments to Comprehensive Plan Chapter 5** to remove reference to the City of Damascus, as well as more clearly define Urban and Rural within the definitions section.

This proposal is consistent with Goal 12.

Goal 13 – *Energy Conservation:*

Goal 13 encourages land use plans to consider lot size, building height, density, and other measures in order to help conserve energy. The proposed amendments would not change any policy or implementing regulation regarding energy conservation.

This proposal is consistent with Goal 13.

Goal 14 – *Urbanization:*

The purpose of Goal 14 is to provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities. The Goal primarily concerns the location of UGBs, the establishment of "urbanizable areas" and unincorporated communities, exception lands, and rural industrial uses. ZDO-284 would not modify any UGB or the status or boundaries of any unincorporated community. The ordinance would not modify any urban or rural reserve boundary, allow any new land use in such reserve areas in a manner inconsistent with state law, change the land use plan designation or zoning of any property, or allow any new uses in exception lands in a manner inconsistent with state law.

This proposal is consistent with Goal 14.

Goal 15 – *Willamette River Greenway:*

ZDO-284 would not change any existing requirement related to development in the Willamette River Greenway.

This proposal is consistent with Goal 15.

Goals 16-19:

These four Statewide Planning Goals address estuarine resources, coastal shorelands, beaches and dunes, and ocean resources, respectively, and are **not applicable** to Clackamas County.

2. Metro Regional Transportation Functional Plan

The purpose of the Functional Plan is to implement “the goals and objectives of the Regional Transportation Plan (RTP) and the policies of the RTP and its constituent freight, high-capacity transit and transportation system management and operations plans which cities and counties of the region will carry out in their comprehensive plans, transportation system plans (TSPs), and other land use regulations and transportation projects.” Staff has reviewed the provisions of the Damascus Mobility Plan and determined that it is consistent with the Metro Regional Transportation Functional Plan

Notice of this proposal was provided to Metro to allow a review for consistency with the Regional Transportation Functional Plan. Metro has not submitted any comment on the *Damascus Mobility Plan*.

The proposal is consistent with the Metro Regional Transportation Functional Plan

4. Clackamas County’s Comprehensive Plan

Staff finds that the following two chapters of the County’s Comprehensive Plan are applicable to this proposal.

Chapter 2 – *Citizen Involvement*:

Chapter 2 aims to promote public participation in the County’s land use planning. Its policies largely focus on the County’s Community Planning Organization (CPO) program and methods for informing and involving the public. Chapter 2 includes these specific policies:

2.A.1 – Require provisions for opportunities for citizen participation in preparing and revising local land use plans and ordinances. Insure opportunities for broad representations, not only of property owners and Countywide special interests, but also of those persons within the neighborhood or areas in question.

2.A.6 – Seek citizens' input not only through recognized community organizations, but also through service organizations, interest groups, granges, and other ways.

2.A.13 – Insure that the County responds to citizen recommendations through appropriate mechanisms and procedures.

Consideration of ZDO-284 has proceeded according to the noticing and public hearing requirements of ZDO Section 1307. The public engagement process for the Damascus Mobility Plan included:

- Notification with postcards (printed in English and Spanish) mailed to every residence and business in the former city of Damascus, as well as virtual open house announcements on social media.
- A special web page linked from the project website with surveys and input tools allowing the public to share their comments and concerns.
- Interactive maps that enabled the public to select intersections and road segments and provide input on issues or suggestions on improvements for that location.
- Zoom public meetings were held during which the project team made a presentation and members of the public had the opportunity to ask questions and make comments. There were 21 attendees at the Zoom public meetings.
- The engagement process also included one virtual meeting with the Damascus Community Planning Organization (CPO) and an in-person presentation at a CPO-sponsored community meeting.
- An online open house was conducted during which 604 people visited the online open house and viewed the materials. Of those, 35 provided comments.

Appendix B of the *Damascus Mobility Plan* provides additional detail and copies of all the materials that were used.

This proposal is consistent with Chapter 2.

Chapter 11 – *The Planning Process*:

Chapter 11 of the Comprehensive Plan includes policies requiring inter-governmental and inter-agency coordination, public involvement, and noticing. As explained previously in this report, all required entities have been notified in accordance with law and have been invited to participate in duly-advertised public hearings.

Chapter 11 of the Comprehensive Plan also contains the specific requirement that the Comprehensive Plan and ZDO be consistent with Statewide Planning Goals. The plan has been reviewed and determined to be consistent with the Statewide Planning Goals.

This proposal is consistent with Chapter 11.

5. Zoning and Development Ordinance (ZDO):

The proposed text amendments are legislative. Section 1307 of the ZDO establishes procedural requirements for legislative amendments, which have been or are being followed in the proposal and review of ZDO-284. Notice of this proposal was provided at least 35 days before the first scheduled public hearing to DLCDC, as well as other interested agencies, to allow them an opportunity to review and comment on the proposed amendments. Advertised public hearings are being held before the Planning Commission and the BCC to consider the proposed amendments. The ZDO contains no further specific review criteria that must be applied when considering an amendment to the text of the Comprehensive Plan or ZDO.

This proposal is consistent with the Zoning and Development Ordinance.

RECOMMENDATION

Staff finds the amendments to Comprehensive Plan proposed in ZDO-284 are consistent with all applicable goals and policies and are necessary to comply with Oregon Administrative Rules (OAR) Chapter 660, Division 12. Staff recommends that the Planning Commission recommend approval of ZDO-284 to the Board of Commissioners, including:

1. Updates to **Tables 5-3a 20-Year Capital Projects, 5-3b Preferred Projects, 5-3c Long Term Capital Projects, and 5-3d Regional Capital Projects;**
2. Updates to **Map 5-11a, Capital Improvement Plan;** and
3. Text amendments to **Comprehensive Plan Chapter 5, Transportation System Plan and Appendix B, Summary of Supporting Documents.**

ATTACHMENTS

1. ZDO-284 Proposed Comprehensive Plan Amendments
2. *Damascus Mobility Plan*, July 2022