

## MEMORANDUM

April 30, 2010

**TO:** Mayor Kovash and City Council Members  
**FROM:** Tom Coffee, Consultant   
**SUBJECT:** Stafford Area Report

### **Overview**

The main event in April was the Clackamas County Board of Commissioners public hearing on the County's proposed Comprehensive Plan amendments that were prepared by staff to implement the County's IGA with Metro concerning urban and rural reserves. Other activities at Metro related to the reserves process and potential urban growth boundary expansion included review of the Regional Transportation Plan, review of the Urban Growth Report and revisions to Chapter 11 of the Urban Growth Management Plan concerning concept planning for the urban reserves.

### **Clackamas County Plan Amendment Hearing**

Mayor Kovash testified at the County Commissioner's hearing along with the Consultant and Councilor Cummings in opposition to the amendments that would designate Stafford as an urban reserve. Mayor Kovash reminded the Commissioners of the City of West Linn's long-standing opposition to the urbanization of the Stafford area along with the neighboring cities of Lake Oswego and Tualatin. He also emphasized that a majority of the citizens supported the City's position as evidenced by a recent survey that found that 69% of West Linn's residents supported opposition to urbanization.

Councilor Cummings reiterated her extensive personal involvement as a representative of West Linn throughout the last two years of the reserve process and expressed her concern over recently proposed amendments to the Metro Code that would make concept planning irrelevant to future UGB expansions.

The Consultant submitted a written report on findings in the Regional Transportation Plan that demonstrated that with the projected traffic impacts of development in the Stafford Area, Factors 1 and 3 for designating the area urban reserve could not be met. The report is attached. Maps in the report have been previously distributed to the City Council and are available from the Planning Department.

The Community Development Director for Tualatin also testified in opposition to the urban reserve plan amendment. A copy of his testimony attached. The City of Lake Oswego did not participate in the hearing.

Following the close of the hearing the Commissioners voted unanimously to approve the Comprehensive Plan Amendments designating urban and rural reserves in the County including Stafford as an urban reserve.

### **Potential Urban Growth Boundary Expansion in 2010**

With the reserve process proceeding to hearing by the Metro Council and review by LCDC in the fall, Metro staff have turned their attention to the question of whether the UGB will have to be expanded this year to provide capacity for 20 years of population and job growth. MTAC and MPAC will be reviewing the assumptions concerning the capacity of the existing UGB.

Since there is the possibility that some land will need to be added to the UGB, Metro staff have enquired of the cities in the region whether they would be interested in participating in concept planning for urban reserve areas that adjoin their cities. The cities of West Linn, Lake Oswego and Tualatin have all told Metro that they are not interested in participating in any way in the preliminary planning of the Stafford urban reserve area.

### **Chapter 11 Concept Planning Amendments**

The IGA's between the Counties and Metro require that concept planning be done for urban reserve areas before they are added to the UGB. This principle was agreed to by the parties in response to concerns over whether areas added to the UGB would actually be governed, served and developed and whether significant natural areas would be protected. In order to codify this requirement Metro has prepared amendments to its code, the Urban Growth Management Functional Plan, that describe how concept planning is to be accomplished.

The amendments contain a provision that in the event that the parties to a concept plan, for example, West Linn, Lake Oswego, Tualatin, Clackamas County and Metro; cannot agree to a concept plan for Stafford within an agreed upon time period, Metro can add the area to the UGB if it is needed to meet the state mandated 20 year land supply requirement. This provision is under review by MPAC and will be considered along with the entire amendment package for recommendation to the Metro Council.

### **Observation**

It is clear that the designation of Stafford as an urban reserve can only be reversed at LCDC or a court of appeal.

# **West Linn Testimony Concerning the Traffic Impacts of Designating the North Stafford Area Urban Reserve as Proposed in Comprehensive Plan Amendment ZDO-233**

TO: Clackamas County Board of Commissioners

FROM: Tom Coffee, Consultant for West Linn

DATE: April 21, 2010

SUBJECT: Traffic Impacts of Designating the North Stafford Area Urban Reserve

## **INTRODUCTION**

Previous testimony presented by the City of West Linn has demonstrated that the North Stafford Area does not meet the factors for designation as an urban reserve. Information published in the Final Draft 2035 Regional Transportation Plan further demonstrates that, even based on conservative estimates of housing units in the Stafford area, the impacts on the roadway system will be significant and the area cannot meet Factors 1 and 3 for designation as an urban reserve.

## **THE FINAL DRAFT 2035 REGIONAL TRANSPORTATION PLAN**

The final draft of the Plan was published in March 2010. It contains an analysis of the effects of assumed growth in the region on the region's roadways through 2035. The growth that is assumed in the RTP is not based on the future urban reserves that Metro and the Counties have recently identified because they have not been finally approved. The growth is based on assumptions and calculations embedded in MetroScope, Metro's model for forecasting where and when growth is likely to occur based on existing legislation and policies.

For purposes of modeling future growth, MetroScope assumes that there will be between 6,600 and 11,200 dwelling units in the Stafford area (Page A7-32 of APPENDIX 7 of the Draft 2009-2030 Urban Growth report). An average of these numbers would be 8,900. Since the RTP is for 2035, an additional 5 years, an assumption of 10,000 units in Stafford is reasonable, considering the fact that there could theoretically be much higher densities if the area is urbanized.

Based on the density assumptions of MetroScope, the RTP assigns future traffic loads to the region's roadway system. The results are mapped and presented in the Plan as Mobility Policy Indicators for different times of the day with three different levels of

funding for improvements to address the increased traffic. The maps displaying the results for the 2 hour PM Peak are Figures 5.3, 5.5, 5.7 and 5.9 in the Plan and are attached. The maps indicate congested traffic areas that do not meet the Plans mobility policies. That is they do not meet traffic service levels commonly referred to as levels A,B,C,D,E and F where A is free flowing traffic and F is gridlock. The red lines on the maps are service level F.

### **THE TRAFFIC IMPACTS OF URBANIZING STAFFORD**

The first Map (Figure 5.3) shows the “2005 Base Year” conditions with sections of Highway 43, I-205, Stafford Road and Borland Road experiencing service level F at PM Peak without urbanization of Stafford.

The second Map (Figure 5.5) shows “2035 No Build” conditions with the Metroscope projected urbanization in the Stafford area and no improvements to the transportation system. All of Highway 43 from downtown Portland to Oregon City, I-205 from Oregon City to Stafford, almost all of Borland Road, almost all of Stafford Road, and sections of McVey and A Avenue in Lake Oswego degrade to service level F at PM Peak.

The third Map (Figure 5.7) shows the “2035 Federal Policies” conditions. This Map assumes that the \$13,600,000,000 to be derived in the next 25 years from all available sources have been spent on transportation improvements. Even with this expenditure, the only improvement in the level F conditions at PM Peak noted above is on the section of Stafford Road from the I-205 interchange to just north of the Tualatin River Bridge. Congestion on the west and east ends of Borland and on McVey get worse.

The fourth Map (Figure 5.9) shows the “2035 RTP Investment Pool” conditions. This map assumes an additional \$7,000,000,000 has been raised by accomplishing the following. 1.) A 1% annual increase in state registration fees through 2035; 2.) The initiation of a 1% regional registration fee with 1% annual increases through 2035; 3.) A 2% increase in the Tri-Met payroll tax; 4.) An increase in SDC fees by all jurisdictions to the regional average; and 5.) The adoption by all jurisdictions of a street utility fee for street operations, maintenance and preservation.

Even with the addition of these new funds, the total investment of \$20.6 billion dollars in the transportation system would not eliminate any of the service level F condition from the road sections noted above in the Stafford area and adjoining communities.

### **URBAN RESERVE FACTORS**

Factor 1 requires that the area *can be developed at urban densities in a way that makes efficient use of existing and future public and private infrastructure investments.*

The Final Draft RTP analysis and projection of traffic service levels resulting from development in the Stafford area demonstrates that the area **cannot be developed** at urban densities to make efficient use of **existing roadway infrastructure investments** because such development would result in their operating at service level F. Similarly, even with an investment of \$13.6 billion in reasonably expected funding and another \$7.0

billion in hypothetical funding **there is no future public investment** that will improve traffic service levels above F.

Factor 3 requires that the area *can be efficiently and cost-effectively served with public schools and other urban level public facilities and services by appropriate and financially capable service providers.*

The Final Draft RTP analysis and projection of traffic service levels resulting from development in the Stafford area demonstrates that the area **cannot be efficiently and cost-effectively served with street facilities because there are no financially capable service providers** that can afford to provide the needed facilities.

### **CONCLUSION**

The traffic impact on mobility in the Stafford area, as modeled by the Final Draft of the 2035 Regional Transportation Plan, clearly demonstrates that the Stafford area does not meet Factors 1 and 3 for designation as an urban reserve and the area should be left undesignated.



# City of Tualatin

[www.ci.tualatin.or.us](http://www.ci.tualatin.or.us)

April 21, 2010

Lynn Peterson, Chair  
Clackamas County Board of Commissioners  
2051 Kaen Road  
Oregon City, OR 97045

RE: CITY OF TUALATIN TESTIMONY ON ZDO-223

Dear Chair Peterson:

The City of Tualatin has been actively engaged in the Clackamas County process for designation of urban and rural reserves. The City has repeatedly provided comments, feedback and testimony throughout the duration of the process opposing the designation of urban reserves in the Clackamas County portion of the Stafford Basin. The County and Metro eventually entered into an Intergovernmental Agreement identifying a significant amount of urban reserve land within the basin known as 4A, 4B, 4C and 4D over the objections of the City. The City of Tualatin continues to object to the designation of these areas as urban reserve based on our analysis that the areas do not meet the factors for urban reserve designation. The City of Tualatin requests that all correspondence and communications between the City and County related to the urban reserves designation process up through the end of February 2010, which the County has in its files on the urban/rural reserve process, be entered into the record for the public hearing for ZDO-223.

The City of Tualatin requests that the Board of Commissioners deny ZDO-223.

Sincerely,

A handwritten signature in black ink, appearing to read 'Douglas R. Rux', written over a horizontal line.

Douglas R. Rux, AICP  
Community Development Director

cc: Tualatin City Council