STAFF REPORT TO THE DONALD PLANNING COMMISSION

DONALD URBAN GROWTH BOUNDARY EXPANSION

REPORT DATE: April 19, 2018

PUBLIC HEARING: April 26, 2018

FILE NUMBER: **#** LA 2017-01

APPLICANT: City of Donald, PO BOX 388 Donald, OR 97020

CRITERIA: A. City of Donald Development Ordinance (DDO), Section 3.110 Comprehensive Plan Map Amendments, Section 3.202 Procedures, Section 3.203 Type IV Actions Procedures, and Section 3.204 Public Notice.

B. City of Donald & Marion County Urban Growth Boundary and Policy Agreement 1986
C. City of Donald Comprehensive Plan, Urban Growth Program Policies
D. Marion County Comprehensive Plan, Urbanization Policies, Urban Area Planning
E. Oregon Statewide Planning Goals
F. Oregon Administrative Rules (OAR) Chapter 660 Division 24

RECOMMENDATION: Recommend the Donald City Council adoption of the findings and approval of the Comprehensive Plan Map Amendment Legislative Action (file # LA 2017-01).

SUMMARY: The City of Donald performed a Buildable Land Inventory (BLI) and Housing Needs Analysis (HNA) in 2014. The BLI and HNA were adopted into the City of Donald Revised Comprehensive Plan in 2015. Through those analyses, it was determined that the City of Donald had a deficit of 76.7 acres within the current Urban Growth Boundary (UGB) when providing for Donald's 20-year housing need. To address this residential land need, the City of Donald initiated an Urban Growth Boundary (UGB) Expansion Study by City Council vote in April of 2017. The UGB study examined properties surrounding the City of Donald, as directed in the Oregon Administrative Rules (OAR) Chapter 660 Division 24, under the guidance of a technical advisory committee (TAC), and with multiple opportunities for public engagement. The adoption of a Comprehensive Plan Map Amendment presented as Legislative Action file # LA 2017-01 represents the recommendation of the TAC to the City of Donald for public hearing. The proposed amendment includes a UGB expansion totaling 87.6 acres, which is composed of 76.7 acres of residential land and 10.9 acres of public facility land. The recommended expansion area, the preferred alternative, was "Alternative C."

PROCEDURE: Pursuant to Section 3.110.01 of the Donald Development Ordinance (DDO), a Comprehensive Plan Map Amendment involving more than five properties is to be processed as a Type IV application, a Legislative Amendment. In accordance with the DDO, the Planning Commission holds a public hearing to make a recommendation to the Donald City Council. The City Council will convene a public hearing to make a decision on the proposed Legislative Action. Following a public hearing, the City Council may make a

determination, followed by two readings of the ordinance. Following the City Council's decision, the City will request Marion County Board of Commissioners concurrence in accordance with the Urban Growth Boundary and Policy Agreement. The Marion County Board of Commissioners will review the amendment, set a date for a public hearing, hold a public hearing, and then adopt an ordinance. Once both the City and the County have adopted ordinances, the proposed amendment is reviewed by the Department of Land Conservation and Development (DLCD), which also provides a public comment period prior to final acknowledgement.

OVERVIEW : URBAN GROWTH MANAGEMENT FRAMEWORK
Source: Marion County Comprehensive Plan

Each city is required by State law to comply with the LCDC Urbanization Goal 14 by establishing an urban growth boundary. These boundaries are for the purpose of identifying the geographic limit to which urban development will expand during the foreseeable future, which for cities is the 20-year planning horizon of their acknowledged comprehensive plans. The main intent of boundaries is to logically contain urban sprawl and separate urbanizable lands from rural lands.

The State goal requires each community to establish an urban growth boundary as part of its comprehensive plan program. The extent and location of each urban growth boundary will be based upon the individual community needs, conditions and growth expectations. The area identified for future urbanization should be considered flexible with any changes occurring based upon changing needs of the community, consideration of the above LCDC Statewide Land Use Planning Goal 14 criteria, and applicable provisions of the Urban Growth Management Framework.

Marion County and each of the 20 cities in the County have jointly agreed upon and adopted an urban growth boundary as part of each city's comprehensive plan. These boundaries are shown on the General Land Use/Transportation Plan Map. The County and each of the cities have adopted intergovernmental agreements in the form of urban growth boundary and policy agreements or urban growth boundary coordination agreements for establishment of the urban growth boundaries, to address coordination requirements regarding Plan amendments and changes to the boundaries, and for identification of areas of special mutual concern.

BACKGROUND

In 2014 the City of Donald performed a Buildable Land Inventory (BLI), a Housing Needs Analysis (HNA), and an Economic Opportunities Analysis (EOA). These analyses were then adopted into the City of Donald Revised Comprehensive Plan Land Use and Urbanization elements in 2015. As the analyses demonstrated a residential land deficit, the City of Donald is addressing that need through this legislative amendment. This amendment proposes to add land for residential and public facility purposes only. No commercial or industrial land is proposed to be added at this time, as no need was shown in the 2015 adopted BLI and EOA.

The City of Donald secured a Marion County Community Project grant to fund an Urban Growth Boundary Expansion Study, and contracted with the Mid-Willamette Valley Council of Governments to perform the work. The Donald City Council voted unanimously to initiate this study on April 11, 2017. The Post-Acknowledgement Plan Amendment (PAPA) was submitted to DLCD in May of 2017 in order to begin the study process securely under the adopted BLI, HNA, and certified population forecast figures. The Technical Advisory Committee (TAC) convened a total of four meetings, dated December 7, 2017, January 4, 2018, February 8, 2018, and April 5, 2018. A survey was mailed directly to all property owners within the preliminary study area to gather baseline

information. A public open house was hosted at the Donald City Hall on February 26, 2018. The local public hearings for this project are scheduled with the Donald Planning Commission on April 26, 2018 and Donald City Council on May 8, 2018.

RELATED PROJECTS

There are a several important complementary projects running in tandem to this amendment. The significance of each is detailed below.

The City of Donald successfully secured funding and technical assistance through the State of Oregon's Transportation and Growth Management (TGM) program to perform a package of updates to the Donald Development Ordinance (DDO). Of concern to this amendment, the TGM code revisions are expected to add a mixed-use zone for the city's commercial center, as well as Planned Unit Development (PUD) code language expected to enable flexibility and density bonuses, for a variety of housing types. The PUD tool will likely be utilized in the future development of an expanded Donald UGB. Overall, the TGM package of code revisions further expand workforce housing options within the community of Donald.

The City made a successful grant application to the Business Oregon Infrastructure Finance Authority (IFA) to largely fund new water and wastewater master plans for the City of Donald. The planned upgrades and subsequent expansion of local facilities will be necessary to serve anticipated residential development within the expanded UGB prior to the year 2034.

The City of Donald recently partnered with GK Machine and other large local employer(s) on an Request for Application response to the State of Oregon Workforce Housing Initiative Pilot Program. While results of this application are not yet known, the joint application demonstrates strong public-private partnership locally, working together to address Donald's critical workforce housing demands. The application describes the concerns: *"Donald's workforce housing crisis developed due to an imbalance between the number of jobs and available housing units in the community. Due to a previous surplus of industrial zoned land, and the success of agri-businesses in Donald, job creation in the community has surged during the last 5 years…Sutherland Development is now planning the next phase of the Donald Industrial Park, however there is concern among prospective tenants that the local housing shortage will impact their ability to attract and retain employees."*

PROPOSED AMENDMENT TO EXPAND DONALD'S UGB

Based on the evidence generated from the 2014 BLI and HNA, there is insufficient land within the existing UGB to meet the 20-year forecasted population growth of the city. To address this deficit, as required by the State of Oregon, the City desires to provide additional land for residential development.

This proposed amendment would expand the Donald UGB by a total of 87.6 acres in the southeastern quadrant of the city. The expansion area is composed of 76.7 acres of residential land and 10.9 acres of public facility land. The expansion area includes portions of nine (9) parcels and one right of way, as depicted on Map 1 below (and Attachments A1 and A2), and detailed in the Table 1 below.

The expansion area is contiguous to the current city limits and UGB. It is bordered by Main Street/Donald Rd NE to the north and Matthieu Street NE to the west. The parcels are designated "Agriculture" in the Marion County Comprehensive Plan, and zoned Exclusive Farm Use (EFU). Residentially-zoned land within the incorporated City of Donald is located to the north and west of the expansion area. These neighborhoods are zoned primarily R7-Single Family Residential, with some limited of MF- Multiple Family Residential to the north. There is also some

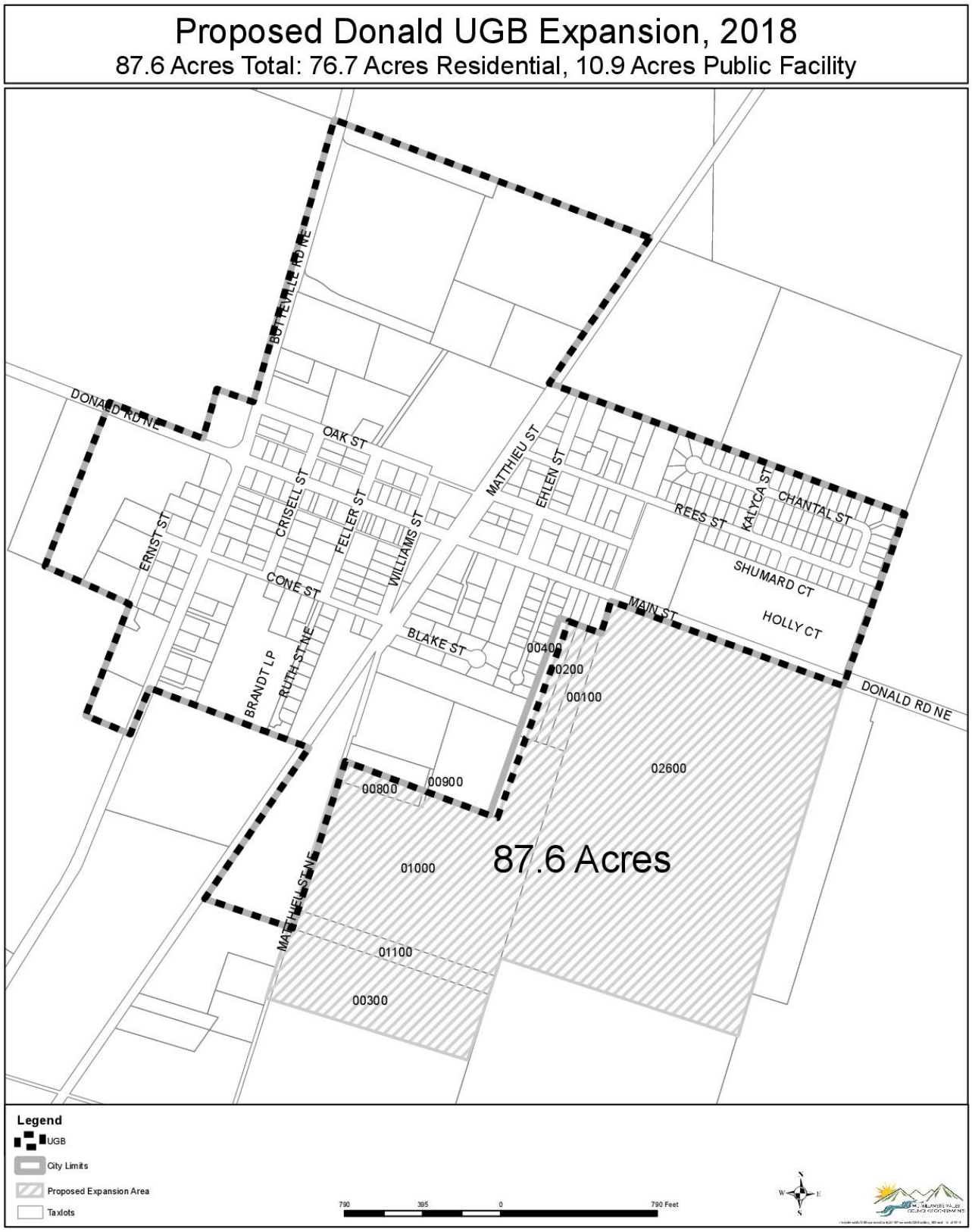
industrially-zoned property to the west. A majority of the area (by acres) included in this proposal are vacant and involved in agricultural production.

The nine properties included in this amendment are owned by four different property owners. All of the property owners returned completed survey forms to the TAC indicating a willingness to be included in the UGB expansion. No parcel is located within the identified 100-year flood plain, or contains other identified hazards such as steep slopes.

Table 1: Summary of properties proposed for inclusion in the Donald Urban Growth Boundary, 2018

Tax lot	Total Acres of Property	Acres outside UGB Currently	Acres Proposed UGB Inclusion	Current Use
041W1702600	92	92	52.3	Vacant, Agricultural
041W17C00100	1.42	1.20	1.20	Residence, Split UGB
041W17C00200	1	0.81	0.81	Residence, Split UGB
041W17C00400	1.73	0.72	0.72	Residence, Split UGB
041W17C01000	23.29	19.76	19.76	Storm Water Detention Basin, Agricultural
041W17C00800	2	0.91	0.91	Residence, Split UGB
041W17C00900	0.08	0.04	0.04	Vacant
041W17C01100	2.36	2.36	2.36	Vacant
041W200300	28.14	8.61	8.61	Vacant, Agricultural
Matthieu Street Public ROW	Street	Street	0.88	Unimproved County Street Right of Way
TOTAL			87.6	

Map 1: Proposed UGB Expansion Area



DECISION CRITERIA AND STAFF FINDINGS

CRITERIA:

A. City of Donald Development Ordinance (DDO), Section 3.110 Comprehensive Plan Map Amendments, Section 3.202 Procedures, Section 3.203 Type IV Actions Procedures, and Section 3.204 Public Notice.
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A. DONALD DEVELOPMENT ORDINANCE (DDO)

3.110 COMPREHENSIVE PLAN MAP AMENDMENTS
3.110.01 Process

Amendments to the Comprehensive Plan map shall be reviewed in accordance with the Type III review procedures specified in Section 3.201. Type III reviews shall be limited to map amendments affecting 5 or fewer adjacent parcels ownerships. Map amendments affecting more than 5 parcels ownerships shall be considered legislative actions and subject to a Type IV review process.

FINDINGS: The proposed amendment includes portions of nine properties. It is therefore processed as a legislative amendment, which is a Type IV review process.

3.110.03 Criteria for Approval
Plan map amendment proposals shall be approved if the applicant provides evidence substantiating the following:

A. Compliance is demonstrated with the Statewide Land Use Goals that apply to the subject properties or to the proposed land use designation. If the proposed designation requires an exception to the Goals, the applicable criteria in the LCDC Administrative Rules for the type of exception needed shall also apply.

FINDINGS: A full analysis of this proposed amendment under Oregon's Statewide Planning Goals is included later in this report. Staff finds that the proposed amendment complies with the Statewide Planning Goals. This amendment does not require an exception to the Goals.

B. Consistency with the applicable goals and policies in the Comprehensive Plan is demonstrated.

FINDINGS: An analysis of this proposed amendment in relation to the City of Donald Comprehensive Plan as well as the Marion County Comprehensive Plan goals and policies is included later in this report. Staff finds that the proposed amendment is consistent with both Comprehensive Plans.

C. The Plan does not provide adequate areas in appropriate locations for uses allowed in the proposed land use designation and the addition of this property to the inventory of lands so designated is consistent with projected needs for such lands in the Comprehensive Plan.

FINDINGS: The 2034 population projection for Donald is 2,085 persons. This projection has been adopted by Marion County for the City of Donald through a coordinated process required under state law (ORS 195.036). A

total of 856 housing units will be needed to accommodate this population. This represents 465 additional housing units that will be needed through the year 2034.

The adopted 2015 Buildable Lands Analysis (BLI) and Housing Needs Assessment (HNA) demonstrated that the current land within the UGB was not sufficient to meet the needs of the projected 20-year population growth. The City is now taking action to address that need, as it is required to do by the state of Oregon.

The adopted 2015 BLI and HNA demonstrated a residential land need of 69.3 acres plus an assumed 25% for public facilities, streets, and parks, totaling 86.6 acres. Of that total, 9.93 acres of land was identified as "vacant and redevelopable" already within the existing UGB. The remaining balance of land need was therefore 76.7 acres. This proposed amendment is consistent with that projected need, detailed within the Comprehensive Plan. Staff finds this criteria is met.

Table 2 below summarizes the important figures when calculating UGB expansion size.

Determining Proposed Donald UGB Expansion	Acres
Total 20-year residential land need, determined by 2014 BLI and HNA	69.3
Add 25% of land need for public use: facilities, streets, parks, etc.	17.3
Total land needed for residential development through 2034	86.6
Subtract land currently available inside the existing UGB (vacant and redevelopable)	9.93
Total deficit of land needed for future residential use outside of current UGB	**76.7**
Add undevelopable storm water detention basin public facility adjacent to residential	10.9
Total UGB expansion proposed (76.7 residential, 10.9 public facility)	**87.6**

Table 3 below summarizes the dwelling units (DU) needed by 2034 (per the HNA adopted in the 2015 Revised Comprehensive Plan). Original data source: 2009-2013 American Community Survey

Housing Type	Total DU Needed	Existing DU	Exist DU by %	Add'l DU Needed	New DU by %	Density DU/acre	Total Acres Needed	Total Acres Needed + 25%
Single Family	771	384	98.2	387	83.2	6.22	62.2	77.75
Multi. Family	85	7	1.8	78	16.8	11	7.1	8.88
Total	856	391	100	465	100	-	69.3	86.63

Table continued…

Housing Type	Total Acres Needed + 25%	BLI Acres Avail. Vacant & Redev.	Acres Needed (Expansion)	Future Zone
Single Family	77.75	8.64	69.11	R7
Multi. Family	8.88	1.29	7.59	RM
Total	86.63	9.93	76.7	

D. The Plan provides more than the projected need for lands in the existing land use designation.

FINDINGS: This UGB amendment proposes to add only the exact number of acres of residential land needed, as determined by the adopted BLI and HNA.

This proposed amendment does, however, include an additional 10.9 acres of public facility which resulted from the UGB Study process. Close examination of the City's Storm Water Plan revealed that an existing storm water detention facility and associated pipes were protected from development in a package of permanent

easements, spanning several different properties included within this proposed amendment. It made sense to the TAC that this public facility should be brought under City jurisdiction (rather than County) for ease of management and maintenance. If the facility was not included in this amendment, the approximately 10.9 acres would become an unincorporated island surrounded on all sides by the Donald UGB, and eventually incorporated city. Again, the additional 10.9 acres of public facility are not developable, are protected by a permanent easement held by the city, and are fully occupied by a storm water detention basin (pit) which resulted from the previous mining operation of clay by the local Needy Brick and Tile Company.

> *E. The proposed land use designation will not allow zones or uses that will destabilize the land use pattern in the vicinity or significantly adversely affect existing or planned uses on adjacent lands.*

FINDINGS: This amendment will assign a City Comprehensive Plan designation for the expansion area, propose interim Marion County Zone designations, and recommend a future City zone designation, which would be enacted upon future annexation into the city limits. The current City of Donald Comprehensive Plan only names four general land use types: 1) Residential, 2) Commercial, 3) Industrial, and 4) Public.

Of the total 87.6 acres, 76.7 acres are proposed to receive interim Marion County zoning designation of UT - Urban Transition, City of Donald Comprehensive Plan designation of "Residential," and future City of Donald Zone designation of 7.59 acres "MF – Multiple Family Residential" (16.8% of new dwelling units) and 69.11 acres of "R7 – Single Family Residential" (83.2% of new units), upon annexation. Staff finds this criteria is met.

Marion County's UT - Urban Transition Zone is described below:

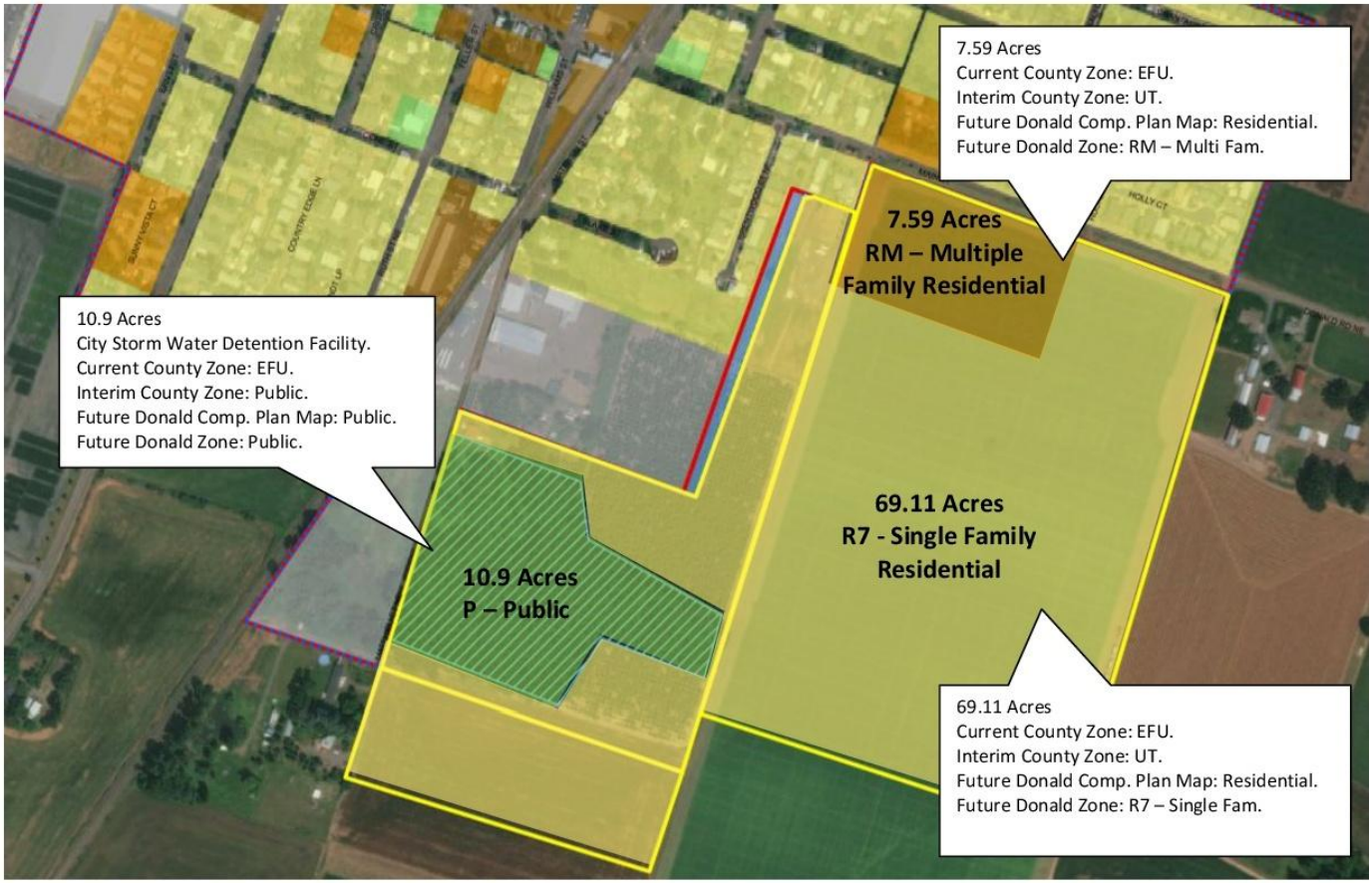
> *Marion County Code, Section 16.13.000 PURPOSE.*
> *The UT (urban transition) zone is intended to retain and protect for future urban use properties which are undeveloped or underdeveloped and do not have available urban facilities such as sanitary sewer, water, drainage and streets. The zone allows the continuation of legally established uses and establishment of uses compatible with the plan designation. … In areas planned for other uses the zone is intended to retain lot sizes conducive to efficient development of planned uses and prevent conflicts associated with development of additional dwellings. The zone is also intended to encourage the continued practice of commercial agriculture in areas planned for future urban development. The UT zone is intended to be a farm zone consistent with ORS 215.203.*

Of the total 87.6 acres, 10.9 acres are proposed to receive short term Marion County zoning of "Public," City of Donald Comprehensive Plan designation of "Public," and eventually City of Donald zone designation of "Public" upon annexation. These proposed land use designations at both the County and City level are consistent with the pre-existing and continued use of the storm water detention basin as a public facility for the southeast quadrant of the current City of Donald. No change is expected, therefore no adverse effects to adjacent lands are anticipated with these designations. To the contrary, the existing public facility will continue to serve as a critical facility for the anticipated nearby residential development.

Table 4: Current and Future Zone Designations of the expansion area

Acres	Current County Zone	Proposed County Zone	City Comp. Plan Designation	Future City Zone
76.7	EFU – Exclusive Farm Use	UT – Urban Transition	Residential	7.59 acres – RM Multiple Family Residential 69.11 acres – R7 Single Family Residential
10.9	EFU – Exclusive Farm Use	Public	Public	Public

Map 2: Recommended future City of Donald zone designations of the expansion area (also Attachment XXXX)



The proposed Comprehensive Plan designation, Interim County Zoning, and future City Zoning designations are recommended as consistent and complementary to adjacent uses. No adverse effects are anticipated to adjacent land use patterns, existing uses, or planned uses. Staff finds this criteria is met.

F. Public facilities and services necessary to support uses allowed in the proposed designation are available or will be available in the near future.

FINDINGS: Consulting firm Curran McLeod is contracted to perform City Engineering services for the City of Donald. Curran McLeod is currently preparing water and waste water master plans for the City of Donald. The City Engineer has confirmed that the proposed UGB expansion area is serviceable by both water and sewer. "In

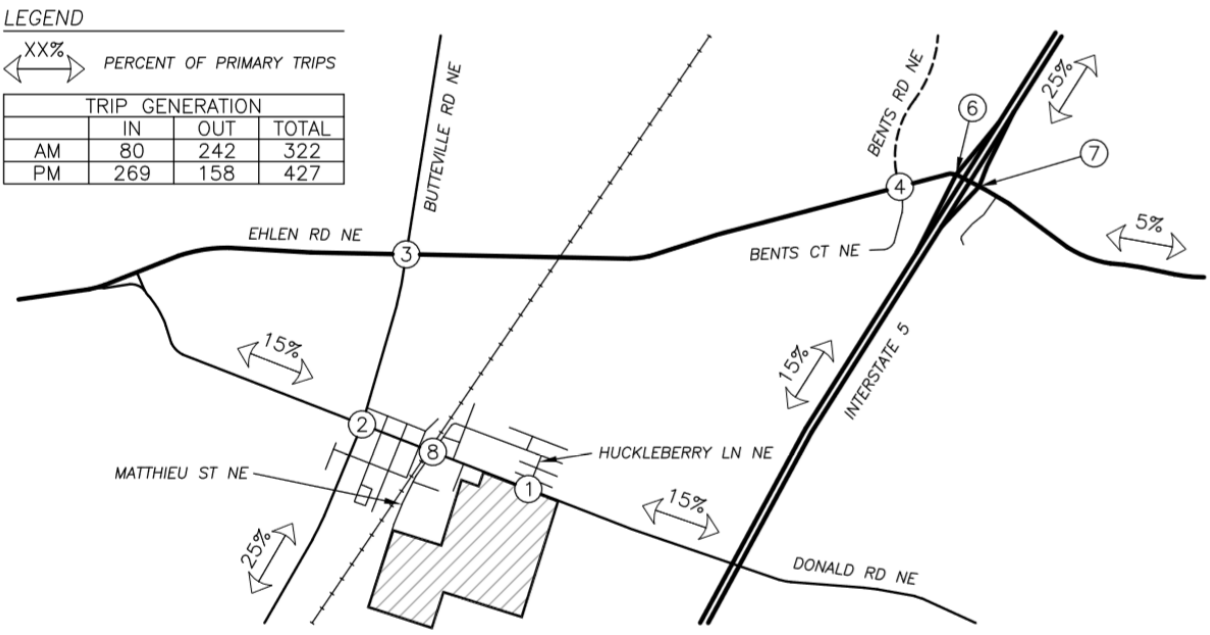
an overview, the entire area of the City limits has a well-developed network of public infrastructure capable of supporting additional development."

The City Engineer reports on the water system capacity: "No improvements are mandated as a result of demands, but rather a result of long-term system performance." Additionally, there may be a potential benefit to the City in a private well located on one of the subject properties. The City Engineer has reviewed preliminary documents, and believes that there could be an opportunity for a cost savings to the City from the proposed expansion area if the City were to assume ownership and/or water rights to that facility, in conjunction with future annexation and development of the property. Additional testing is required, both in terms of quality and capacity, to assess the feasibility of this water source to serve future municipal supply.

The City Engineer reports on the waste water system capacity: "Although the collection system has sufficient surplus capacity for any UGB expansion alternatives, the lagoon treatment and irrigation facilities are currently at capacity and will require expansion with any alternative selected."

Further, the proposed expansion area has the benefit of utility connections to both Main Street/Donald Road NE and Matthieu Street NE, both of which have large water and sewer pipelines that can support growth. The proposed expansion area also includes access to the storm water detention facility that has capacity to accommodate additional storm water runoff. Utility improvements can be provided without unusual expense, and would provide opportunities to loop water and transportation improvements.

The City of Donald contracted Lancaster Engineering to perform a Transportation Impact Analysis (TIA) on the proposed UGB expansion. The TIA report is included in this document as Attachment D. The purpose of the TIA was "to examine the potential traffic impacts of developing the UGB expansion area. The includes long-term analysis that addresses the operation of each of the seven study intersections in order to ensure the transportation system is capable of safely and efficiently supporting the existing uses and proposed UGB expansion." The TIA forecasted intersection performance to the 2034 planning horizon consistent with the UGB planning horizon, with and without the proposed expansion. It is important to note that there are multiple jurisdictions involved including the City of Donald for local street, Marion County for the regional roads, the Oregon Department of Transportation for Interstate-5 and the corresponding on-ramps, as well as ODOT Rail division and the railroad itself. The seven studied intersections are identified on Map 3 below.



In summary, the TIA found that the proposed UGB expansion area would generate approximately 322 site trips during the morning peak hour and 427 site trips during the evening peak hour. Lancaster Engineering found:

- The intersections of Donald Rd. NE (Main St.) at Huckleberry Lane and Butteville Rd. NE at Donald Rd. NE (Main St.) are projected to operate acceptably through the year 2034, with or without the UGB development. No mitigations are proposed at these intersections.

- The intersection of Main St. at Matthieu St. NE will carry a minority of traffic from the UGB expansion area and will operate acceptably. No mitigations are proposed at this intersection.

- The intersection of Ehlen Rd. NE at Butteville Rd. NE will not meet operational standards in the year 2034, with or without the proposed UGB development. The Marion County Rural Transportation System Plan (TPS) shows the need for improvements at this intersection. The County is currently considering a roundabout or traffic light. In this case, the roundabout would be a safest option.

- The intersections of Ehlen Rd. NE at Bents Ct. and Ehlen Rd. NE at Bents Rd. will not meet operational standards in the year 2034, with or without the proposed UGB development. Realignment of Bents Rd. and signalization is planned in the Marion County TSP.

- The intersections of Ehlen Rd. NE at the I-5 ramps currently fail to meet operational standards today without the proposed UGB development. The process of planning and designing improvements to the interchange has begun in the ODOT Interchange Area Management Plan (IAMP), which is ongoing.

- A railroad divides the City of Donald, with a single rail crossing on Main Street immediately west of the intersection with Matthieu Street NE intersection. The current crossing offers a high level of crossing protection with flashers and gates that are activated in advance of a crossing. The proposed UGB expansion is located east of the railroad tracks and the existing crossing is sufficient to accommodate the expansion area without any upgrade of the crossing treatment. Most new crossings are required to be grade separated, with the street going either over or under the railroad. A new crossing in Donald

would require grade separation and would be prohibitively expensive. For these reasons, a new rail crossing is not proposed as part of the UGB expansion process.

The proposed intersection improvements within Marion County and ODOT jurisdiction are critical to regional economic development and safety conversations. The City will continue to work closely with the County and State on these issues. Future development of the proposed UGB expansion area as well as other vacant properties in Donald may trigger additional studies and financial participation in future improvements, based upon their proportional share of the impact. It is worth noting that the Donald UGB TIA did not identify any future intersection failures that were previously unknown, and the appropriate jurisdictions are already actively addressing the problem areas, as evidenced in the County TSP-identified projects and ODOT IAMP. The timing of these projects in relation to Donald's anticipated growth (both employment and housing lands) will be an ongoing discussion.

As the interim County zoning designation of UT proposed for the residential expansion area would not cause a increase in development or traffic, the Transportation Planning Rule (TPR) is not required at this time. That requirement and analysis is anticipated to occur at the time of annexation of the subject properties. Therefore, staff finds this criteria is met.

3.203 TYPE IV ACTIONS PROCEDURES

3.203.01 Initiation
Type IV may be initiated by:
A. Majority vote of the City Council.
B. Majority vote of the Planning Commission.
C. Recommendation by the City Manager, or designee, subject to majority approval by the City Council or Planning Commission.

FINDINGS: The Donald UGB Expansion Study was authorized by a 5-0-0 vote of the Donald City Council on April 11, 2017.

3.203.02 Procedure for Type IV Actions
A. Public Hearings by Planning Commission

FINDINGS: A public hearing is scheduled before the Donald Planning Commission on April 26, 2017.

B. Public Hearing by City Council

FINDINGS: A public hearing is scheduled before the Donald City Council on May 8, 2018.

3.204 PUBLIC NOTICE REQUIREMENTS
3.204.03 Type IV Actions
Written notice of a hearing before the Planning Commission or City Council hearings shall be given by publication of a notice in a newspaper of general circulation in the City not less than 10 days prior to the date of the hearing before the Planning Commission or City Council.

FINDINGS: A written notice of both the Planning Commission and City Council hearing dates was published in the Woodburn Independent on Wednesday, April 18, 2018, which is eight (8) days prior to the Planning Commission public hearing and twenty (2) days prior to the scheduled City Council public hearing. The Planning Commission

should allow a continuation of the public hearing if any parties request additional time, in order to mitigate the deficient notice period. Public notice was also posted at City Hall 10 days prior to the public hearing. A public notice was mailed to the property owners of all parcels included in Alternative Expansion Areas A, B, and C. A public notice of the meeting date, time, and place was included in the monthly City Newsletter which was mailed to all local utility customers at the beginning of April. The public hearing date and time were also available on the City's website.

B. Donald Urban Area Growth Management Agreement

The adopted Urban Growth Boundary and Policy Agreement signed on April 2, 1986 between the City of Donald and Marion County establishes requirements and methods for amending the City's Urban Growth Boundary. The agreement states that "establishment and change of the boundary shall be a cooperative process between a City and a County or counties that surround it," per ORS Chapter 197 and the Land Conservation and Development Commission (LCDC) Goal 14 on Urbanization. Amending the UGB is treated as a map amendment to both the city and county Comprehensive Plan Maps. Specific decision criteria are found in section eight.

Conversion of land within the boundary to urban uses shall be based on a consideration of:

A. Orderly, economic provision for public facilities and services;

FINDINGS: This criterion has been previously addressed. Public facilities and services are available nearby.

B. Availability of sufficient land for the various uses to ensure choices in the market place;

FINDINGS: This criterion has been previously addressed. There is not currently sufficient residential land available to meet anticipated demands of a growing population. An expanded UGB as proposed with this amendment would provide available residential land for a variety of housing types, as permitted under the Donald Development Ordinance (DDO), and as market conditions dictate.

C. LCDC Goals;

FINDINGS: This criterion is addressed later in the report under the Statewide Planning Goals.

D. Encouragement of in-filling development within developed areas before conversation of urbanizable areas;

FINDINGS: This criterion has been previously addressed. The 2014 BLI and HNA determined a total need of 86.6 acres of residential land, 9.93 acres of which could be satisfied by vacant or redevelopable properties already within the current UGB. Following this infill, a deficit of 76.7 acres of needed residential land remains.

E. Applicable provisions of the Marion County and City Comprehensive Plans.

FINDINGS: Applicable Marion County and City of Donald Comprehensive Plan provisions are addressed below.

C. CITY OF DONALD COMPREHENSIVE PLAN

Urbanization Element
Urban Growth Program Policies:

1. Annexations of the City should be discouraged until a major portion of the City's buildable vacant land is developed.

FINDINGS: No annexation is proposed at this time. The residential land need of 76.7 acres proposed to be added with this amendment is the balance of the total need after all inventoried vacant and redevelopable residential properties (9.93 acres) currently within city are developed.

2. Since the City is the provider of urban services, development outside the city limits should be discouraged and should be rural agricultural uses only. City services should not be extended outside the city limits.

FINDINGS: City services are not proposed to be extended outside the city limits with this amendment. The proposed UGB expansion area provides, to the greatest extent possible, compact urban form, urban densities to meet the anticipated workforce housing need, and opportunities to loop public infrastructure (services) available for development only after annexation has occurred.

3. Zoning and land uses between the city limits and the Boundary should be reviewed by the City and administered by the County.

FINDINGS: Zoning and land uses in this area are generally administered by the County and reviewed by the City.

4. Areas outside the Boundary should be maintained in a rural agricultural use.

FINDINGS: An interim UT- Urban Transition Marion County zoning designation is proposed to be applied to the UGB expansion area, which is generally consistent with the existing conditions, discouraging additional development from occurring outside of city limits, until annexation. This proposed action is not anticipated to impact rural agricultural areas outside the proposed UGB expansion area.

5. Lands within the Urban Growth Boundary shall be available for urban development concurrent with the provision of key urban facilities.

FINDINGS: The City Engineer has determined that it is possible to serve the proposed UGB expansion area with city water, waste water, and storm water facilities. The City received IFA funding to prepare water and wastewater master plans, anticipated to be complete in August of 2018. The master plans will identify necessary improvements and upgrades of the existing facilities in order to accommodate future development on the subject properties and elsewhere throughout the city. The DDO generally requires some public improvements to be performed by the developer. The City collects System Development Charges (SDCs) and Marion County collects proportional shares for larger projects which are shown to have significant impacts upon county transportation facilities. These requirements are each based upon the type and scale of the proposed development project, with triggers at various thresholds, to ensure that key urban facilities continue to serve the community.

6. The city shall review methods to increase residential development densities allowed in the R-7 and RM zoning districts to partially accommodate housing needs that are projected through 2034.

FINDINGS: The City of Donald has been awarded a grant through the State of Oregon's Transportation and Growth Management (TGM) program for technical assistance on a package of code amendments, including a proposed downtown mixed-use zone (which will allow residential above ground floor commercial uses), as well

as a Planned Unit Development (PUD) code, enabling future residential development of the UGB expansion area to acquire density bonuses in exchange for the provision of public amenities to benefit the greater community. The PUD code density bonuses could result in the development of housing units exceeding the residential need determined in the HNA.

7. The city shall amend the Donald Urban Growth Boundary to incorporate additional residential land needed to accommodate projected housing need through 2034.

FINDINGS: This proposed amendment aims to accomplish this policy by expanding the UGB by the needed 76.7 acres of residential land, as determined by the adopted HNA.

D. MARION COUNTY COMPREHENSIVE PLAN

The establishment of each urban growth boundary which also involves proposals to expand the existing, acknowledged growth boundary, should be based upon the following criteria as indicated in the Land Conservation and Development Commission Urbanization Goal:

a. Demonstrated need to accommodate long-range urban population, consistent with a 20-year population forecast coordinated with affected local governments;

FINDINGS: The 20-year population projection was adopted by Marion County for the City of Donald through a coordinated process required under ORS 195.036. The adopted HNA demonstrates the housing need.

b. Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories;

FINDINGS: The BLI indicated that there is a sufficient supply of employment land, of both commercial and industrial zoning. The Donald UGB was expanded in 2008 for this purpose. This amendment addresses only residential land needed for housing, and subsequently an adjacent public facility as well. This need was demonstrated in the adopted HNA.

c. Orderly and economic provision for public facilities and services;

FINDINGS: As previously addressed, these parcels are located adjacent to the city limits. Services can be readily extended to each of the parcels, with beneficial opportunities to loop infrastructure through the expansion area. Donald's new water and wastewater master plans should be completed in August of 2018.

d. Efficient accommodation of identified land needs;

FINDINGS: The BLI identified infill potential to provide housing development opportunities on vacant and redevelopable land. Only after that inward look was completed did the UGB outward expansion become necessary to fulfill the remaining deficit. The proposed expansion area is relatively compact in form, connecting the city's Matthieu Street and Donald Street. All of the properties within the proposed expansion area are contiguous to the existing UGB as well as to each other.

e. Comparative environmental, energy, economic and social consequences;

FINDINGS: To maintain air, water, and land quality, all new development is required to connect to city public sewer, water, and storm water services. All new construction will be required to comply with adopted energy efficiency standards. There are economic benefits to the community, through an increased housing supply to meet the demand of a locally-employed population, which would otherwise continue to commute to the workplace from out of the area. Local employers report that an expanded housing supply locally could mean a reduction in employee turn-over and retraining due to shortened commutes and lower transportation costs to and from the workplace. In the near term, there will be an increase in construction jobs, as the expansion area is developed. Socially, a locally-based workforce could be more invested in the community. The North Marion School District reports that it has the capacity to accommodate the additional households, assuming that many would add school-aged children to their campus. Further, the development of the expanded area would add park space and other public amenities to the community, a benefit to all residents.

f. Evaluating alternative boundary locations consistent with ORS 197.298; and

FINDINGS: ORS 197.298 refers to a priority order of land under consideration to be included in an urban growth boundary of Metro. Presumably this statute language has changed since the statute citation was included in the Marion County policies. The City of Donald is not a part of the Portland Metropolitan Area (Metro). Rather, the applicable alternatives analysis rule used in this amendment was OAR 660-024-0067(2) Priority Land for inclusion in a UGB. This analysis is provided in greater detail in the following OARs section.

In summary, there are no urban reserve, exception land, non-resource lands, or marginal lands adjacent to the City of Donald, which would be considered the first and second priority lands for UGB inclusion. The third priority lands are forest or farm land that is not predominantly high-value. The City of Donald is surrounded on all sides by predominantly high-value farm land consisting largely of prime soils, as determined by the USDA Natural Resource Conservation Service (NRCS). The fourth priority category for inclusion states that *"A city may not select land that is predominantly made up of prime or unique farm soils, unless there is an insufficient amount of other land to satisfy its land need. In selecting which lands to include to satisfy the need, the city must use the Agricultural Land Capability Classification System to select lower capability lands."*

An examination of the "Soil Survey of the Marion County Area, Oregon" and the most current soil maps for the county sourced from the Oregon Geospacial Data Clearinghouse (Source: NRCS) clearly indicates all expansion alternatives involved prime and high value farm land with soils ranging from Class I to Class IV. The expansion area presented in this amendment was "Alternative C." It was selected as the preferred alternative because it contained the least amount of Prime soils (Classes I and II), and the most amount of lower quality soils (Classes III and IV), compared to other alternative expansion areas studied. It was determined to be the preferred alternative for this reason above all other criteria.

g. Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

FINDINGS: The City recognizes that with few exceptions, Donald is located within an area of significant agricultural production. Expansion of the city will likely have similar impacts, regardless which direction the city expands.

E. STATEWIDE PLANNING GOALS

GOAL 1: CITIZEN INVOLVEMENT OAR 660-015-0000(1)

"To develop a citizen involvement program that ensures the opportunity for citizens to be involved in all phases of the planning process."

FINDINGS: The City and the County entered into an Urban Growth Management & Policy Agreement which specifically addresses the issue of an urban growth boundary expansion. Consistent with the guidelines contained in this agreement, the City conducts hearings before both the Planning Commission and the City Council to review the proposed amendment. The decision of the City Council is final and the decision is forwarded to Marion County for their review and decision. All hearings will be noticed, open to the public, and provide an opportunity for public input in all phases of the planning process.

The City of Donald Expansion Study was conducted from December of 2017 to April of 2018. The study format provided several opportunities for public engagement. The first public outreach event was the City of Donald Annual Community Santa Sing-Along event on December 8, 2017. During this event, a project announcement was made and additional information was available. Four Technical Advisory Committee (TAC) meetings were convened, which were posted as open to the public. The most important opportunity for public engagement was during the Public Open House hosted on February 26, 2018 at the Donald City Hall. During this event, multiple staffed information stations by topic were available. Large format maps of the expansion area alternatives were posted on the wall. Staff provided an overview presentation followed by a question and answer session.

Throughout the duration of the study, a webpage dedicated to the UGB Expansion with linked documents was hosted on the City's website. Staff contact information was provided to receive any questions, comments, or concerns. Several articles provided updates on the project in the City's monthly newsletter to the community.

Staff reached out to 1,000 Friends of Oregon to brief their staff on the project details, to ensure that there were no outstanding questions during the study process. Staff also followed up with the Friends of French Prairie representative in attendance at the Public Open House to clarify and address additional questions and concerns.

An informational letter and survey was mailed to the owners of all 63 properties included within the preliminary study area in order to provide them an overview of the UGB Expansion Study, as well as to capture their preference whether or not they were willing to be included in a possible UGB expansion. Ultimately, approximately 73% of surveys were returned and/or survey feedback was provided in person by the property owner.

Additional opportunity for public comment will be provided through the public hearings process, including hearings before the Donald Planning Commission, Donald City Council, and Marion County Board of Commissioners. Public notice for both of the City's UGB hearings was provided through the Woodburn Independent, which is a regional weekly newspaper with local circulation. The first notice of public hearing was published in the Woodburn Independent on April 18, 2018. The Donald community was also notified of the public hearings in the monthly newsletter from City Hall, which is delivered directly to every household in the monthly utility billing. The public hearings were posted in prominent public locations and on the City's website. An additional courtesy public notice was mailed directly to the owners of properties located within Alternatives A, B, and C, 10 days prior to the public hearing, postmarked on April 16, 2018.

Notice of the proposed post acknowledgement plan amendment (PAPA) was provided to the Oregon Department of Land Conservation and Development (DLCD) originally in May of 2017, and it was updated on March 21, 2018, which is at least 35 days prior to the date of the first evidentiary hearing, scheduled on April 26,

2018. Procedures for adoption of a Legislative Amendment (LA) as outlined in the DDO have also been followed. Staff finds this criteria is met.

GOAL 2: LAND USE PLANNING OAR 660-015-0000(2)
"To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions."

FINDINGS: OAR 660-024-0020(1)(a) specifically states the exception process is not applicable unless a local government chooses to take an exception to a specific goal requirement. This proposal does not involve exceptions to other goals. The policy framework for this process is clearly delineated in the City & County Urban Growth Boundary and Policy Agreement, as well as in the OAR Chapter 660 Division 24.

GOAL 3: AGRICULTURAL LANDS OAR 660-015-0000(3)
"To preserve and maintain agricultural lands."

FINDINGS: OAR 660-024-0020(1)(b) specifically states Goal 3 is not applicable.

GOAL 4: FOREST LANDS OAR 660-015-0000(4)
"To conserve forest lands by maintaining the forest land base and to protect the state's forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest tree species as the leading use on forest land consistent with sound management of soil, air, water, and fish and wildlife resources and to provide for recreational opportunities and agriculture."

FINDINGS: OAR 660-024-0020(1)(b) specifically states Goal 4 is not applicable.

GOAL 5: NATURAL RESOURCES, SCENIC AND HISTORIC AREAS, AND OPEN SPACES OAR 660-015-0000(5)
"To protect natural resources and conserve scenic and historic areas and open spaces."

FINDINGS: No information was submitted which documents that significant natural resources, scenic and historic areas, or open spaces exist and/or will be impacted by the Donald UGB decision.

Records sourced from the Oregon State Historic Preservation Office (SHPO) provided a map of all the eligible, contributing, and significant resources (historic buildings) in the area. The map confirmed that no sites within the Preliminary Study Area were listed as an Oregon Historic Site.

Consultation with Department of State Lands (DSL) staff confirmed that the National Wetlands Inventory does not show wetlands present on the subject properties, however studies of aerial photos and LiDAR imagery for the area suggest that there may possibly be wetland conditions on the far southern end of the proposed expansion area, coinciding with the drainage easements associated with the storm water detention basin. Future development may be required to provide a wetland delineation prior to subdivision or planned unit development (PUD)approvals by the city to ensure that an appropriate buffer is maintained around any possible riparian or wetland resources. A map of the Marion County hydrography is provided as Attachment B4. Staff finds this criteria is met.

GOAL 6: AIR, WATER AND LAND RESOURCES QUALITY OAR 660-015-0000(6)
"To maintain and improve the quality of the air, water and land resources of the state."

FINDINGS: When developed, the residential uses will be required to connect to city public sewer, water, and storm systems, thereby minimizing impact on air, water, and land resource quality. Staff finds this criteria is met.

GOAL 7: AREAS SUBJECT TO NATURAL HAZARDS
"To protect people and property from natural hazards."

FINDINGS: The parcels are not located within an identified natural disaster or hazard area. Staff finds this criteria does not apply.

GOAL 8: RECREATIONAL NEEDS OAR 660-015-0000(8)
"To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts."

FINDINGS: The total 76.7 acres residential land deficit includes 25% for public amenities and facilities. It is reasonable to expect additional community recreational amenities to result from the UGB expansion. There is no existing recreational land within the vicinity that could be adversely impacted by this action. Staff finds this criteria is met.

GOAL 9: ECONOMIC DEVELOPMENT OAR 660-015-0000(9)
"To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens."

FINDINGS: Available housing supply is a critical factor in Donald's economic development capacity. Several large employers in Donald have stated that lack of available local workforce housing results in high turn-over due to long commutes, resulting in rising re-training expenses for the local companies. Increased residential land supply is expected to support existing and future businesses in the Donald area and greater Marion County region. Short term housing development will provide construction-related jobs. Additionally, the increased population within an expanded UGB will provide a greater customer base for the City's modest downtown commercial core. While employment land is not addressed as part of this proposed UGB expansion, staff finds the proposed residential expansion can be found to support and not be detrimental to Goal 9.

GOAL 10: HOUSING OAR 660-015-0000(10)
"To provide for the housing needs of citizens of the state."

FINDING: This action will increase the local housing supply to meet current and forecasted demand in the city of Donald. A mix of single and multiple family housing types will provide a variety of housing options for local residents. In total, the vacant, redevelopable, and expansion areas are anticipated to accommodate 465 additional dwelling units for Oregonians by the year 2034. Staff finds this criteria is met.

GOAL 11: PUBLIC FACILITIES AND SERVICES OAR 660-015-0000(11)
"To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development."

FINDINGS: As previously addressed, the subject properties are serviceable and can be integrated within the current public facility system upon the next phase of facility expansion. These lands may therefore be serviced in an orderly and efficient manner consistent with existing public service lines and facilities. Staff finds this criteria is met.

GOAL 12: TRANSPORTATION OAR 660-015-0000(12)
"To provide and encourage a safe, convenient and economic transportation system."

FINDINGS: The City of Donald hired Lancaster Engineering to perform a Transportation Impact Analysis (TIA) for the proposed expansion area with the planning horizon of 2034. A TIA summary is included earlier in this report. The full report is included as Attachment D.

OAR 660-024-0020(d) states "The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary."

The proposed expansion areas are currently zoned Exclusive Farm Use (EFU) by Marion County. Upon inclusion within the Donald UGB, the 76.7 acres of residential land is proposed to be interim zoned UT – Urban Transition by Marion County, allowing for the continuation of agricultural practices. The 10.9 acres of city storm water detention basin is proposed to be zoned P-Public, which is also consistent with the current use as an undevelopable storm water detention basin. Because these proposed interim County zone designations are consistent with the current land use, no additional development or traffic is anticipated to occur until annexation into the city limits, at which time the TPR may apply. For this reason, no Transportation Planning Rule (TPR) findings are required or included in this analysis.

GOAL 13: ENERGY CONSERVATION OAR 660-015-0000(13)
"To conserve energy. Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles."

FINDINGS: This action neither promotes nor precludes energy conservation. Generally, all new development must comply with adopted state energy efficiency standards. Staff finds this criteria is met.

GOAL 14: URBANIZATION OAR 660-015-0000(14)
"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."

BOUNDARY LOCATION FACTORS
The location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197.298 and with consideration of the following factors:

(1) Efficient accommodation of identified land needs;

(2) Orderly and economic provision of public facilities and services;

(3) Comparative environmental, energy, economic and social consequences; and

(4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

FINDINGS: These criteria have been addressed elsewhere in this report. In summary, the proposed UGB expansion area results in a compact urban form adjacent to existing neighborhoods, consisting of the undeveloped area between Main Street /Donald Street NE and Matthieu Street NE. The proximity to the city's central commercial core allows for walkable access to available commercial retail and services. The proposed expansion area utilizes existing transportation infrastructure and results in beneficial looped connections of city services. The provision of workforce housing adjacent to existing and future employment in Donald is a necessary component of the community's economic development capacity. The future development of the UGB expansion area is anticipated to provide new park and open space amenities to serve local residents. The North Marion School District has stated that the facility has the capacity to absorb additional students likely to result from the residential development of this area. Donald is an agricultural community, surrounded on all sides by active agricultural operations within the Willamette Valley. Staff finds this criteria is met.

GOAL 15: WILLAMETTE RIVER GREENWAY OAR 660-015-0005; GOAL 16: ESTUARINE RESOURCES OAR 660-015-0010(1); GOAL 17: COASTAL SHORELANDS OAR 660-015-0010(2); GOAL 18: BEACHES AND DUNES OAR 660-015-0010(3); GOAL 19: OCEAN RESOURCES OAR 660-015-0010(4)

FINDINGS: The proposed amendment does not involve land within the Willamette Greenway, or identified estuarine, coastal shorelands, beach, or ocean areas. These statewide goals do not apply.

F. THE OREGON ADMINISTRATIVE RULES (OAR)

DIVISION 24 URBAN GROWTH BOUNDARIES

660-024-0000
Purpose and Applicability
(1) The rules in this division clarify procedures and requirements of Goal 14 regarding a local government adoption or amendment of an urban growth boundary (UGB). The rules in this division do not apply to the simplified UGB process under OAR chapter 660, division 38.

FINDINGS: The City of Donald implemented an UBG evaluation [study] pursuant to Chapter 660 Division 24 rules. The City of Donald did not implement the recently adopted streamlined process outlined under Chapter 660 Division 38. The City of Donald performed a population forecast, BLI, and HNA in 2014, which were adopted into the City's Comprehensive Plan in 2015. The City initiated the UGB evaluation by a City Council vote on Aril 11, 2017. Notice of a PAPA was provided to DLCD in May of 2017.

660-024-0020
Adoption or Amendment of a UGB
(1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:
(a) The exceptions process in Goal 2 and OAR chapter 660, division 4, is not applicable unless a local government chooses to take an exception to a particular goal requirement, for example, as provided in OAR 660-004-0010(1);
(b) Goals 3 and 4 are not applicable;
(c) Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250;
(d) The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the

zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary;
(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary;
(f) Goals 16 to 18 are not applicable to land added to the UGB unless the land is within a coastal shorelands boundary;
(g) Goal 19 is not applicable to a UGB amendment.

FINDINGS: The Statewide Planning Goals were previously addressed in this report, satisfying this OAR requirement.

660-024-0020(2)
The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location.

FINDINGS: Sufficient maps are provided as Attachment A1.

660-024-0040 Land Need
(1) The UGB must be based on the appropriate 20-year population forecast for the urban area as determined under Rules in OAR 660, div 32, and must provide for needed housing, employment and other urban uses such as public facilities, streets and roads, schools, parks and open space over the 20-year planning period consistent with the land need requirements of Goal 14 and this rule…

FINDINGS: The 2034 population projection for Donald is 2,085 persons, which is more than twice the 2014 population of 950 persons. This projection has been adopted by Marion County for the City of Donald through a coordinated process required under state law (ORS 195.036).

The proposed UGB expansion was initiated prior to July of 2017, which was the effective date of the new certified population forecasts produced by PRC. For this reason, the proposed amendment is based upon the population forecasts, BLI, and HNA, as adopted in the City's 2015 Revised Comprehensive Plan. The forecasted housing need does include a 25% assumption of land for public facilities such as streets, schools, parks and open space over the 20 year planning period.

(2) If the UGB analysis or amendment is conducted as part of a periodic review work program, the 20-year planning period must commence on the date initially scheduled for completion of the appropriate work task. If the UGB analysis or amendment is conducted as a post-acknowledgement plan amendment under ORS 197.610 to 197.625, the 20-year planning period must commence either:

FINDINGS: This UGB Analysis was not conducted as a part of a periodic review work program.

(3) A local government may review and amend the UGB in consideration of one category of land need (for example, housing need) without a simultaneous review and amendment in consideration of other categories of land need (for example, employment need).

FINDINGS: As permitted, this proposed amendment addressed only one category of land need, housing. Other categories were not considered for this amendment.

> *(4) The determination of 20-year residential land needs for an urban area must be consistent with the appropriate 20-year coordinated population forecast for the urban area determined under Rules in OAR 660, div 32, and with the requirements for determining housing needs in Goals 10 and 14, OAR chapter 660, division 7 or 8, and applicable provisions of ORS 197.295 to 197.314 and 197.475 to 197.490.*

FINDINGS: As previously stated in section (1) above, this UGB analysis was initiated prior to the effective date of the most recent population forecast.

> *(5) Except for a metropolitan service district described in ORS 197.015(13), the determination of 20-year employment land need for an urban area …*
> *(6) Cities and counties may jointly conduct a coordinated regional EOA…*

FINDINGS: Sections (5) and (6) above do not apply, as no employment land was analyzed for this amendment

> *(7) The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768. The determination of school facility needs must also comply with 195.110 and 197.296 for local governments specified in those statutes.*

FINDINGS: A Transportation Impact Analysis (TIA) was performed for this proposed amendment in consideration of these applicable requirements. It is attached as Attachment D. The North Marion School District has confirmed that they have sufficient space on their North Marion Campus to accommodate the projected growth of the proposed expansion.

> *(8) The following safe harbors may be applied by a local government to determine housing need under this division…*

FINDINGS: This section does not directly apply to this UGB analysis, as the demonstrated need was already adopted as prepared and presented, in 2015. The adopted need is 76.7 acres of housing, or 465 additional housing units by 2034 (both inside and outside of existing UGB). It is staff's understanding that the safe harbors described in the list [omitted] from section (8) above were used in the production of the 2014 BLI and HNA.

> *660-024-0045 Regional Large Lot Industrial Land*

FINDINGS: As the amendment includes residential and public land only, this section does not apply.

> *660-024-0050 Land Inventory and Response to Deficiency*
> *(1) When evaluating or amending a UGB, a local government must inventory land inside the UGB to determine whether there is adequate development capacity to accommodate 20-year needs determined in OAR 660-024-0040. For residential land, the buildable land inventory must include vacant and redevelopable land, and be conducted in accordance with OAR 660-007-0045 or 660-008-0010, whichever is applicable, and ORS 197.296 for local governments subject to that statute...*

FINDINGS: The 2014 Buildable Lands Inventory (BLI) inventoried all property within the City of Donald. It was determined that there were 7.95 acres of vacant or redevelopable land zoned R7-Single Family Residential, 1.29

acres of vacant or redevelopable land zoned RM – Multiple Family Residential, and 0.69 acres of Residential Comprehensive Plan designated land between the city limits and current UGB. These total 9.93 acres of land available inside the UGB. It is staff's understanding that the pertinent safe harbors were applied.

660-024-0060 Metro Boundary Location Alternatives Analysis

FINDINGS: As the City of Donald is not located in the Metro area, this section does not apply.

660-024-0065 Establishment of Study Area to Evaluate Land for Inclusion in the UGB
(1) When considering a UGB amendment to accommodate a need deficit identified in OAR 660-024-0050(4), a city outside of Metro must determine which land to add to the UGB by evaluating alternative locations within a "study area" established pursuant to this rule. To establish the study area, the city must first identify a "preliminary study area" which shall not include land within a different UGB or the corporate limits of a city within a different UGB. The preliminary study area shall include:
(a) All lands in the city's acknowledged urban reserve, if any;
(b) All lands that are within the following distance from the acknowledged UGB:
(A) For cities with a UGB population less than 10,000: one-half mile;
(B) For cities with a UGB population equal to or greater than 10,000: one mile;
(c) All exception areas contiguous to an exception area that includes land within the distance specified in subsection (b) and that are within the following distance from the acknowledged UGB:
(A) For cities with a UGB population less than 10,000: one mile;
(B) For cities with a UGB population equal to or greater than 10,000: one and one-half miles;
(d) At the discretion of the city, the preliminary study area may include land that is beyond the distance specified in subsections (b) and (c).

FINDINGS: The population of Donald is less than 10,000. The City of Donald does not have an urban reserve or any exceptions areas contiguous to an exception area. For these reasons, the Donald UGB Study Technical Advisory Committee (TAC) established a Preliminary Study Area Boundary of one-half mile. A map of the Preliminary Study is attached as Attachment B1.

(2) A city that initiated the evaluation or amendment of its UGB prior to January 1, 2016…
(3) When the primary purpose for expansion of the UGB is to accommodate a particular industrial use…

FINDINGS: The Donald UGB Analysis was not initiated prior to 2016, nor was the purpose to accommodate a particular industrial use. Sections (2) and (3) above to not apply.

(4) The city may exclude land from the preliminary study area if it determines that:
(a) Based on the standards in section (7) of this rule, it is impracticable to provide necessary public facilities or services to the land;
(b) The land is subject to significant development hazards, due to a risk of:
(A) Landslides…
(B) Flooding…
(C) Tsunamis…

FINDINGS: No land was excluded from the Preliminary Study Area due to impracticality of providing facilities, beyond the characteristic of simple proximity and therefore expense to service, which is discussed later. No land was excluded due to identification of development hazards. None were identified within the study area.

(c) The land consists of a significant scenic, natural, cultural or recreational resource described in this subsection:
(A) Land that is designated in an acknowledged comprehensive plan prior to initiation of the UGB amendment, or that is mapped on a published state or federal inventory at a scale sufficient to determine its location for purposes of this rule, as:
(i) Critical or essential habitat for a species listed by a state or federal agency as threatened or endangered;
(ii) Core habitat for Greater Sage Grouse; or
(iii) Big game migration corridors or winter range, except where located on lands designated as urban reserves or exception areas;
(B) Federal Wild and Scenic Rivers and State Scenic Waterways, including Related Adjacent Lands described by ORS 390.805, as mapped by the applicable state or federal agency responsible for the scenic program;
(C) Designated Natural Areas on the Oregon State Register of Natural Heritage Resources;
(D) Wellhead protection areas described under OAR 660-023-0140 and delineated on a local comprehensive plan;
(E) Aquatic areas subject to Statewide Planning Goal 16 that are in a Natural or Conservation management unit designated in an acknowledged comprehensive plan;
(F) Lands subject to acknowledged comprehensive plan or land use regulations that implement Statewide Planning Goal 17, Coastal Shoreland, Use Requirement 1;
(G) Lands subject to acknowledged comprehensive plan or land use regulations that implement Statewide Planning Goal 18, Implementation Requirement 2;
(d) The land is owned by the federal government and managed primarily for rural uses.

FINDINGS: No land was excluded from the preliminary study area under section (4) above due to identification of significant scenic, natural, cultural or recreational resources. No information was submitted which documents that significant natural resources, scenic and historic areas, or open spaces exist and/or will be impacted by the Donald UGB decision. Staff reached out and/or searched available databases provided by the Oregon State Historic Preservation Office (SHPO), Oregon Department of State Lands (DSL), and Oregon Department of Fish & Wildlife (ODFW). If any resources identified under *660-024-0065(4)(c)* exist and have yet to be identified, pertinent delineation and mitigation will be required of future development prior to city approvals, in coordination with the appropriate agency contacts.

(5) After excluding land from the preliminary study area under section (4), the city must adjust the area, if necessary, so that it includes an amount of land that is at least twice the amount of land needed for the deficiency determined under OAR 660-024-0050(4) or, if applicable, twice the particular land need described in section (3). Such adjustment shall be made by expanding the distance specified under the applicable section (1) or (2) and applying section (4) to the expanded area.

FINDINGS: It was not necessary for the city to adjust the area. The amount of land within the preliminary study area exceeded twice the amount of land needed for the deficiency determined under OAR 660-024-0050.

(6) For purposes of evaluating the priority of land under OAR 660-024-0067, the "study area" shall consist of all land that remains in the preliminary study area described in section (1), (2) or (3) of this rule after adjustments to the area based on sections (4) and (5), provided that when a purpose of the UGB expansion is to accommodate a public park need, the city must also consider whether land excluded under subsection (4)(a) through (c) of this rule can reasonably accommodate the park use.

FINDINGS: As no adjustments were made above, for the purposes of this section, the full "preliminary study area" was considered to be the "study area."

> *(7) For purposes of subsection (4)(a), the city may consider it impracticable to provide necessary public facilities or services to the following lands:*
> *(a) Contiguous areas of at least five acres where 75 percent or more of the land has a slope of 25 percent or greater, provided that contiguous areas 20 acres or more that are less than 25 percent slope may not be excluded under this subsection. Slope shall be measured as the increase in elevation divided by the horizontal distance at maximum ten-foot contour intervals;*
> *(b) Land that is isolated from existing service networks by physical, topographic, or other impediments to service provision such that it is impracticable to provide necessary facilities or services to the land within the planning period. The city's determination shall be based on an evaluation of:*
> *(A) The likely amount of development that could occur on the land within the planning period;*
> *(B) The likely cost of facilities and services; and,*
> *(C) Any substantial evidence collected by or presented to the city regarding how similarly situated land in the region has, or has not, developed over time.*
> *(c) As used in this section, "impediments to service provision" may include but are not limited to:*
> *(A) Major rivers or other water bodies that would require new bridge crossings to serve planned urban development;*
> *(B) Topographic features such as canyons or ridges with slopes exceeding 40 percent and vertical relief of greater than 80 feet;*
> *(C) Freeways, rail lines, or other restricted access corridors that would require new grade separated crossings to serve planned urban development;*
> *(D) Significant scenic, natural, cultural or recreational resources on an acknowledged plan inventory and subject to protection measures under the plan or implementing regulations, or on a published state or federal inventory, that would prohibit or substantially impede the placement or construction of necessary public facilities and services.*

FINDINGS: As no steep slopes, topographic features, or significant resources were identified within the study area, the TAC considered Donald's primary "impediments to service provision" to be primarily based upon: 1) the likely amount of development that could occur on the land within the planning period, as determined by a property owner survey response indicating their willingness to be included in a potential UGB expansion; and 2) the likely cost of facilities and services, based largely upon contiguity with existing UGB and overall distance to closest available infrastructure.

The railroad bisecting the city of Donald was an initial consideration in service provision, but the City Engineer determined that all services could be provided to the expansion acres, whether located west or east of the railroad. Similarly, the TIA confirmed that the one improved at-grade crossing at Main Street and Matthieu Street NE downtown Donald is fully improved with crossing arms and flashing lights and bells. No additional improvements are required to the railroad crossing.

One other consideration was a pressurized natural gas pipeline which runs north to south within the railroad corridor, also bisecting the community. Staff reached out to Kinder Morgan corporation, the pipeline owner and manager for comments. The companies concerns pertained to any street improvements which may occur to Matthieu Street for a short segment between Blake Court and Main Street. During this short segment, the pipeline runs between and/or within the City street right of way and the railroad. A standard list of construction requirements near the pipeline easement was provided. It includes safety precautions such as: prior notice, plan review by KM, depth of cover, drainage, line location, pipe types, no permanent structures in the right of way,

on-site KM monitor during construction near pipeline, no nearby blasting or burning activities, insurance requirements, etc. In summary, none of the standards provided by KM would preclude street improvements sufficient to serve an expanded UGB. So the pipeline is determined not to be a barrier.

(8) Land may not be excluded from the preliminary study area based on a finding of impracticability that is primarily a result of existing development patterns. However, a city may forecast development capacity for such land as provided in OAR 660-024-0067(1)(d).
(9) Notwithstanding OAR 660-024-0050(4) and section (1) of this rule, except during periodic review or other legislative review of the UGB, the city may approve an application under ORS 197.610 to 197.625 for a UGB amendment to add an amount of land less than necessary to satisfy the land need deficiency determined under OAR 660-024-0050(4), provided the amendment complies with all other applicable requirements.

FINDINGS: Neither section (8) or (9) above applies.

660-024-0067 Evaluation of Land in the Study Area for Inclusion in the UGB; Priorities

(1) A city considering a UGB amendment must decide which land to add to the UGB by evaluating all land in the study area determined under OAR 660-024-0065, as follows
(a) Beginning with the highest priority category of land described in section (2), the city must apply section (5) to determine which land in that priority category is suitable to satisfy the need deficiency determined under OAR 660-024-0050 and select for inclusion in the UGB as much of the land as necessary to satisfy the need.
(b) If the amount of suitable land in the first priority category is not sufficient to satisfy all the identified need deficiency, the city must apply section (5) to determine which land in the next priority is suitable and select for inclusion in the UGB as much of the suitable land in that priority as necessary to satisfy the need. The city must proceed in this manner until all the land need is satisfied, except as provided in OAR 660-024-0065(9).
(c) If the amount of suitable land in a particular priority category in section (2) exceeds the amount necessary to satisfy the need deficiency, the city must choose which land in that priority to include in the UGB by applying the criteria in section (7) of this rule.
(d) In evaluating the sufficiency of land to satisfy a need under this section, the city may use the factors identified in sections (5) and (6) of this rule to reduce the forecast development capacity of the land to meet the need.
(e) Land that is determined to not be suitable under section (5) of this rule to satisfy the need deficiency determined under OAR 660-024-0050 is not required to be selected for inclusion in the UGB unless its inclusion is necessary to serve other higher priority lands.

(2) Priority of Land for inclusion in a UGB:

(a) First Priority is urban reserve, exception land, and nonresource land. Lands in the study area that meet the description in paragraphs (A) through (C) of this subsection are of equal (first) priority:
(A) Land designated as an urban reserve under OAR chapter 660, division 21, in an acknowledged comprehensive plan;
(B) Land that is subject to an acknowledged exception under ORS 197.732; and
(C) Land that is nonresource land.

FINDINGS: No urban reserve, exception lands, or non-resource lands were located in the study area to meet the "First Priority" description.

> *(b) Second Priority is marginal land: land within the study area that is designated as marginal land under ORS 197.247 (1991 Edition) in the acknowledged comprehensive plan.*

FINDINGS: No marginal lands were located within the study area to the meet the "Second Priority" description.

> *(c) Third Priority is forest or farm land that is not predominantly high-value farm land: land within the study area that is designated for forest or agriculture uses in the acknowledged comprehensive plan and that is not predominantly high-value farmland as defined in ORS 195.300, or that does not consist predominantly of prime or unique soils, as determined by the United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS). In selecting which lands to include to satisfy the need, the city must use the agricultural land capability classification system or the cubic foot site class system, as appropriate for the acknowledged comprehensive plan designation, to select lower capability or cubic foot site class lands first.*

FINDINGS: No non-high value farm or forest lands were located within the study area. The City of Donald is surrounded on all sides by high value farm land, consisting primarily of prime soils, as determined by the NRCS through the agricultural land capability classification system.

> *(d) Fourth Priority is agricultural land that is predominantly high-value farmland: land within the study area that is designated as agricultural land in an acknowledged comprehensive plan and is predominantly high-value farmland as defined in ORS 195.300. A city may not select land that is predominantly made up of prime or unique farm soils, as defined by the USDA NRCS, unless there is an insufficient amount of other land to satisfy its land need. In selecting which lands to include to satisfy the need, the city must use the agricultural land capability classification system to select lower capability lands first.*

FINDINGS: Section (d) above states that a city may only select land that is predominantly made up of prime farm soils if there is an insufficient amount of other land to satisfy its land need. That was the case with the Donald UGB Study Area. Once it was determined that all lands within the study area were predominantly of prime soils, the TAC applied the agricultural land capability classification system to select the UGB expansion alternative with the greatest amount of lower capability lands. Among the final three alternative areas for expansion, labeled A, B, and C, Alternative C was designated the "Preferred Alternative" because it contained the least amount of prime class I and II soils, and the greatest amount of high-value class III and IV soils. It had essentially the "least best" soils.

Table 5: Soil types and Agricultural Land Capability Classification System by UGB Expansion Alternatives

Soil Type (USDA NRCS)	Ag Land Capability Class	Farmland Type	ALT. A %	ALT. B %	ALT. C %
Wua- woodburn Silt Loam	llw-1	Prime	0.83	0.84	0.79
Am - Amity Silt Loam	llw-2	Prime	0.03	0.00	0.00
Co - Concord Silt Loam	lllw-2	High-Value	0.07	0.00	0.00

Da - Dayton Silt Loam	lVw-1	High-Value	0.07	0.16	0.21

Note: The City's 10.9 acre storm water detention basin public facility was not included within the soils analysis above because the basin is composed of a non-soil class called "pits," similar to assigning it a category of "water." Therefore, the two alternatives which include the detention basin (B and C) are not impacted by it in the soil analysis above. In the table above, all alternatives contain the same area of 76.7 acres.

(3) Notwithstanding section (2)(c) or (d) of this rule, land that would otherwise be excluded from a UGB may be included if:
(a) The land contains a small amount of third or fourth priority land that is not important to the commercial agricultural enterprise in the area and the land must be included in the UGB to connect a nearby and significantly larger area of land of higher priority for inclusion within the UGB; or
(b) The land contains a small amount of third or fourth priority land that is not predominantly high-value farmland or predominantly made up of prime or unique farm soils and the land is completely surrounded by land of higher priority for inclusion into the UGB.

FINDINGS: This section does not apply, because the Donald study area evaluation and ranking was dependent largely upon section (2)(d).

(4) For purposes of categorizing and evaluating land pursuant to subsections (2)(c) and (d) and section (3) of this rule,
(a) Areas of land not larger than 100 acres may be grouped together and studied as a single unit of land;
(b) Areas of land larger than 100 acres that are similarly situated and have similar soils may be grouped together provided soils of lower agricultural or forest capability may not be grouped with soils of higher capability in a manner inconsistent with the intent of section (2) of this rule, which requires that higher capability resource lands shall be the last priority for inclusion in a UGB;
(c) Notwithstanding subsection (4)(a), if a city initiated the evaluation or amendment of its UGB prior to January 1, 2016, and if the analysis involves more than one lot or parcel or area within a particular priority category for which circumstances are reasonably similar, these lots, parcels and areas may be considered and evaluated as a single group;
(d) When determining whether the land is predominantly high-value farmland, or predominantly prime or unique, "predominantly" means more than 50 percent.

FINDINGS: For the purpose of categorizing and evaluating land pursuant to subsection *(2)(d)* above, areas of land not larger than 100 acres were grouped together by alternative expansion area, studied, and presented as a single unit of land, rather than a parcel-by-parcel analysis. To confirm, all three final expansion area alternatives were determined to be predominantly prime (more than 50 percent).

(5) With respect to section (1), a city must assume that vacant or partially vacant land in a particular priority category is "suitable" to satisfy a need deficiency identified in OAR 660-024-0050(4) unless it demonstrates that the land cannot satisfy the specified need based on one or more of the conditions described in subsections (a) through (g) of this section: Existing parcelization, lot sizes or development patterns of rural residential land make that land unsuitable for an identified employment need; as follows:
(A) Parcelization: the land consists primarily of parcels 2-acres or less in size, or

FINDINGS: Regarding parcelization, the proposed UGB expansion area does include four parcels which are below two acres in size each. These properties were considered developable by the TAC (were not deemed "unsuitable"), and so they were included in the proposal.

(B) Existing development patterns: the land cannot be reasonably redeveloped or infilled within the planning period due to the location of existing structures and infrastructure."
(b) The land would qualify for exclusion from the preliminary study area under the factors in OAR 660-024-0065(4) but the city declined to exclude it pending more detailed analysis.
(c) The land is, or will be upon inclusion in the UGB, subject to natural resources protections under Statewide Planning Goal 5 such that that no development capacity should be forecast on that land to meet the land need deficiency.
(d) With respect to needed industrial uses only, the land is over 10 percent slope, or is an existing lot or parcel that is smaller than 5 acres in size, or both. Slope shall be measured as the increase in elevation divided by the horizontal distance at maximum ten-foot contour intervals.
(e) With respect to a particular industrial use or particular public facility use described in OAR 660-024-0065(3), the land does not have, and cannot be improved to provide, one or more of the required specific site characteristics.
(f) The land is subject to a conservation easement described in ORS 271.715 that prohibits urban development.
(g) The land is committed to a use described in this subsection and the use is unlikely to be discontinued during the planning period:
(A) Public park, church, school, or cemetery, or
(B) Land within the boundary of an airport designated for airport uses, but not including land designated or zoned for residential, commercial or industrial uses in an acknowledged comprehensive plan.

FINDINGS: None of the above conditions applied.

(6) For vacant or partially vacant lands added to the UGB to provide for residential uses:
(a) Existing lots or parcels one acre or less may be assumed to have a development capacity of one dwelling unit per lot or parcel. Existing lots or parcels greater than one acre but less than two acres shall be assumed to have an aggregate development capacity of two dwelling units per acre.
(b) In any subsequent review of a UGB pursuant to this division, the city may use a development assumption for land described in subsection (a) of this section for a period of up to 14 years from the date the lands were added to the UGB.

(7) Pursuant to subsection (1)(c), if the amount of suitable land in a particular priority category under section (2) exceeds the amount necessary to satisfy the need deficiency, the city must choose which land in that priority to include in the UGB by first applying the boundary location factors of Goal 14 and then applying applicable criteria in the acknowledged comprehensive plan and land use regulations acknowledged prior to initiation of the UGB evaluation or amendment. The city may not apply local comprehensive plan criteria that contradict the requirements of the boundary location factors of Goal 14. The boundary location factors are not independent criteria; when the factors are applied to compare alternative boundary locations and to determine the UGB location the city must show that it considered and balanced all the factors. The criteria in this section may not be used to select lands designated for agriculture or forest use that have higher land capability or cubic foot site class, as applicable, ahead of lands that have lower capability or cubic foot site class.

(8) The city must apply the boundary location factors of Goal 14 in coordination with service providers and state agencies, including the Oregon Department of Transportation (ODOT) with respect to Factor 2 regarding impacts on the state transportation system, and the Oregon Department of Fish and Wildlife (ODFW) and the Department of State Lands (DSL) with respect to Factor 3 regarding environmental consequences. "Coordination" includes timely notice to agencies and service providers and consideration of any recommended evaluation methodologies.

(9) In applying Goal 14 Boundary Location Factor 2 to evaluate alternative locations under section (7), the city must compare relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. For purposes of this section, the term "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities. The evaluation and comparison under Boundary Location Factor 2 must consider:
(a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;
(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and
(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.

FINDINGS: The TAC identified three final alternative expansion areas based upon proximity of lands to existing UGB, compatibility with adjacent land uses/zones, ability to serve the properties with infrastructure, property owner's willingness to be included in the UGB (development potential), and soil considerations. No City Comprehensive Plan criteria which contradicts the requirements of the boundary location factors of Goal 14 were applied. The following table demonstrates the Alternatives Analysis undertaken by the Donald UGB Expansion Study TAC to address the Goal 14 boundary location factors. Alternative C was selected as the "Preferred Alternative" presented as the proposed UGB expansion area because it contains the lowest quality soils overall, it provides a generally compact urban form, it provides opportunities to loop infrastructure, it provides an opportunity to send all storm water runoff to an existing nearby storm water detention facility, and it may provide an opportunity for the city to acquire an existing well for municipal use (pending further testing).

Table 6: OAR *660-024-0067 Evaluation of Land in the Study Area for Inclusion in the UGB*

		Alt A	Alt B	**Alt C**
Section 1, Lands to Study	Lands within the study area exceed twice the needed size. All lands are zoned EFU.	76.7 acres Residential land	87.6 acres total: 76.7 acres Residential land, 10.9 acres public facility	**87.6 acres total: 76.7 acres Residential land, 10.9 acres public facility**

Section 2, Priority of Land for Inclusion in a UGB	Priority of land for inclusion in a UGB: 1st Priority: urban reserve, exception lands, nonresource lands. 2nd Priority: marginal lands. 3rd Priority: non predominantly high-value farm or forest w/ agricultural designation. 4th Priority: predominantly high-value farm land w/ agricultural designation.	4th Priority 86% Prime 14% High Value	4th Priority 84% Prime 16% High Value	**4th Priority** **79% Prime** **21% High Value**
Section 3, Exclusion of Lands	This doesn't apply since all tracts are Prime.	N/A	N/A	**N/A**
Section 4, Grouping	This section allows for properties to be grouped together for analysis purposes, if under 100 acres.	Single Unit of Analysis: 76.7 acres	Single Unit of Analysis: 76.7 acres	**Single Unit of Analysis: 76.7 acres**
Section 5, Parcelization	Does not apply. No land was removed due to parcelization.	N/A	N/A	**N/A**
Section 6, Vacant & Development Capacity	This section doesn't apply because all parcels are considered a single unit of analysis.	N/A	N/A	**N/A**
Section 7, GOAL 14 Boundary Location Factor #1	The location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197A.320 and with consideration of the following factors: (7)(1) Efficient accommodation of identified land needs.	1) Land is divided into two sections north and south of Main Street, stretching the city form in a linear manner to the east	1) Land is contiguous to current UGB and to itself, generally compact urban form	**1) Land is contiguous to current UGB and to itself, generally compact urban form**
Section 7, GOAL 14 Boundary Location Factor #2	(7)(2) Orderly and economic provision of public facilities and services.	2) City water and sewer can serve. System upgrades necessary regardless of UGB expansion alternative. Water and sewer master planning under way. Would not provide	2) City water and sewer can serve. System upgrades necessary regardless of UGB expansion alternative. Water and sewer master planning under way. Would provide looped system. Potential cost	**2) City water and sewer can serve. System upgrades necessary regardless of UGB expansion alternative. Water and sewer master planning under way. Would provide looped system. Potential cost savings will existing well.**

		looped system. Transportation impacts would not vary significantly.	savings with existing well. Access to storm water detention facility for full UGB area runoff.	**Access to storm water detention facility for full UGB area runoff.**
Section 7, GOAL 14 Boundary Location Factor #3	(7)(3) Comparative environmental, energy, economic and social consequences.	3) Similar impacts	3) Similar impacts	**3) Similar impacts**
Section 7, GOAL 14 Boundary Location Factor #4	(7)(4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.	4) Divided expansion area north and south of Main Street places residential development adjacent to higher number of agricultural operations.	4) Some of the new residential land would be adjacent to active agriculture.	**4) Some of the new residential land would be adjacent to active agriculture.**
Section 8, agency/ service provider coordination	(8) The city must apply the boundary location factors of Goal 14 in coordination with service providers and state agencies, including the Oregon Department of Transportation (ODOT) with respect to Factor 2 regarding impacts on the state transportation system, and the Oregon Department of Fish and Wildlife (ODFW) and the Department of State Lands (DSL) with respect to Factor 3 regarding environmental consequences. "Coordination" includes timely notice to agencies and service providers and consideration of any recommended evaluation methodologies.	8) Transportation consultants coordinated with both Marion County and ODOT in the production of the TIA. Alternatives would have similar impacts upon local & regional transportation facilities. Staff contacted DSL and ODFW.	8) Transportation consultants coordinated with both Marion County and ODOT in the production of the TIA. Alternatives would have similar impacts upon local & regional transportation facilities. Staff contacted DSL and ODFW. Possible wetland conditions could be present in south end of	**8) Transportation consultants coordinated with both Marion County and ODOT in the production of the TIA. Alternatives would have similar impacts upon local & regional transportation facilities.** **Staff contacted DSL and ODFW. Possible wetland conditions could be present in south end of expansion area. Can be studied**

			expansion area. Can be studied and delineated at time of development proposal. Anticipated PUD process could maintain wetlands as open space in exchange for density bonus to developer.	**and delineated at time of development proposal. Anticipated PUD process could maintain wetlands as open space in exchange for density bonus to developer.**
Section 9, public facilities and services	(9) In applying Goal 14 Boundary Location Factor 2 to evaluate alternative locations under section (7), the city must compare relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. (a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB; (b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and (c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.	Addressed in (7)(2) above. Disadvantages include: lack of opportunity to loop lines, lack of ability to use storm water detention facility for full expansion area	Addressed in (7)(2) above. Advantages include: ability to loop lines, ability to use storm water detention facility for full expansion area runoff, and possible use of existing well. Alternatives B and C are identical in this regard.	**Addressed in (7)(2) above.** **Advantages include: ability to loop lines, ability to use storm water detention facility for full expansion area runoff, and possible use of existing well.** **Alternatives B and C are identical in this regard.** **PREFERRED ALTERNATIVE**

(10) The adopted findings for UGB amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis.

FINDINGS: Maps of the three alternative expansion areas, referred to as “Alternative A, Alternative B, and Alternative C” are included as Attachments A6 and A7 to this report.

LEGISLATIVE ACTION COMPREHENSIVE PLAN MAP AMENDMENT, FILE # LA 2017-01 CONCLUSIONS

Based on the findings in this report, staff finds the application (File #LA 2017-01) meets the requirements for a Comprehensive Plan Map Amendment as a legislative action under the Donald Development Ordinance (DDO), the City and Council Urban Growth Management and Policy Agreement, the Donald Comprehensive Plan Urbanization Policies, the Marion County Comprehensive Plan Urban Area Planning Policies, the Statewide Planning Rules, and the pertinent sections of the Oregon Administrative Rules (OAR).

Staff recommends that the Planning Commission recommend ADOPTION of the findings in the staff report and APPROVAL of the Comprehensive Plan Map Amendment (file # LA 2017-01) to the Donald City Council.

PLANNING COMMISSION OPTIONS:

A. A motion to recommend adopting the findings in the staff report and approving the Comprehensive Plan Map Amendment, file # LA2017-01 to the Donald City Council.

    1. As recommended by staff; or
    2. As further conditioned by the Planning Commission (stating any revisions).

B. A motion to continue the public hearing to a time and date certain.

C. A motion to recommend denial of the Comprehensive Plan Map Amendment to the Donald City Council (stating findings for the denial).

ATTACHMENTS

DONALD URBAN GROWTH BOUNDARY EXPANSION

A. Proposed UGB Maps

1. Black & White map with proposed UGB expansion
2. Color aerial photo with zoning overlay and proposed UGB expansion
3. Comprehensive Plan Map current
4. Comprehensive Plan Map with proposed UGB
5. Recommended zone designations
6. Alternatives A, B, C considered for UGB expansion
7. Alternatives B, B, C over soils layer

B. Resource Maps

1. Preliminary Study Area ½ mile radius
2. Soils, MWVCOG
3. Soils, Marion County
4. Hydrography, MWVCOG
5. Contours, MWVCOG
6. City Water & Sewer Facilities

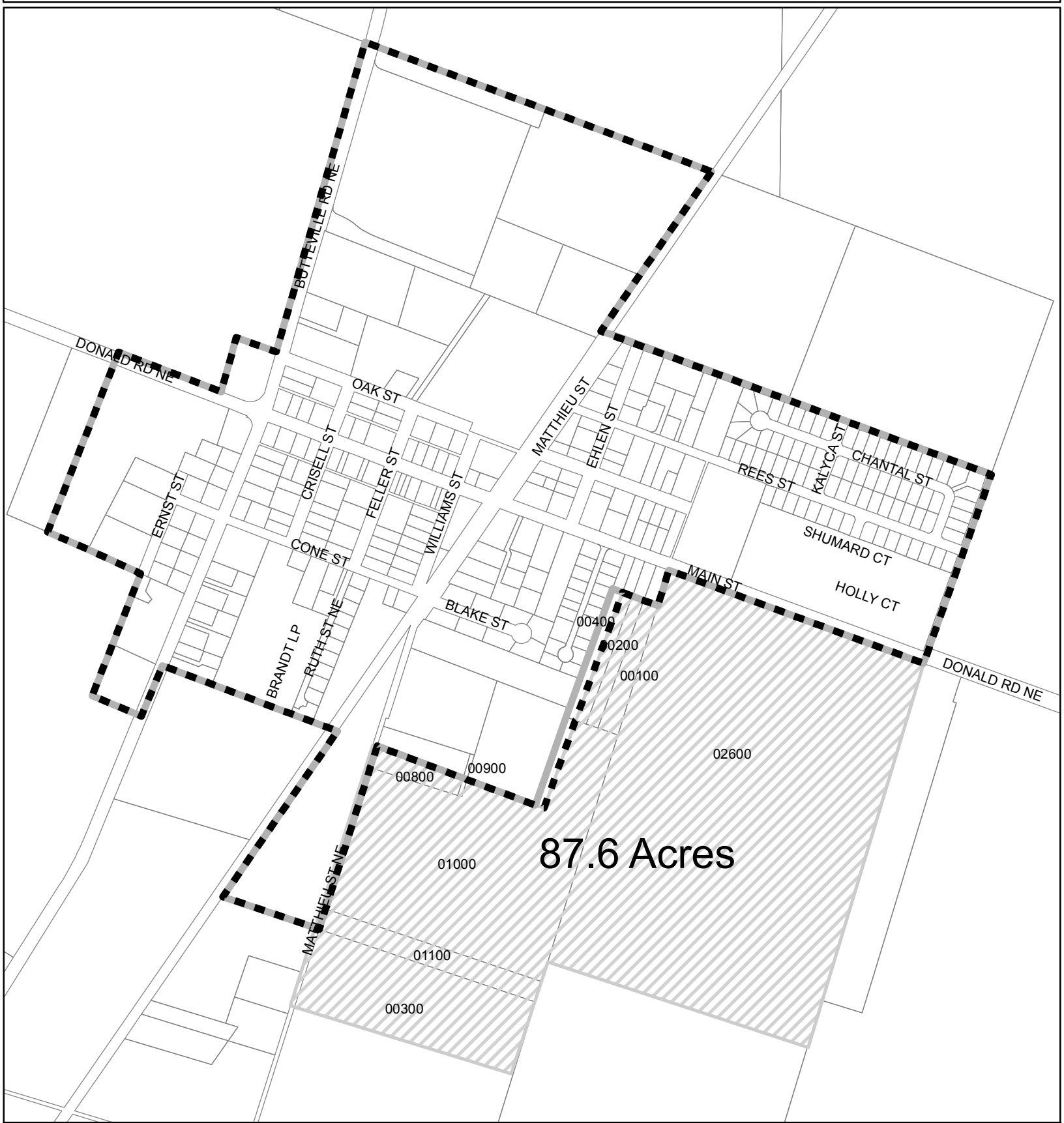
C. Statement from City Engineer on City Facilities

D. Traffic Impact Analysis (TIA) performed by Lancaster Engineering

Proposed Donald UGB Expansion, 2018

ATT. A1

87.6 Acres Total: 76.7 Acres Residential, 10.9 Acres Public Facility



Legend

- UGB
- City Limits
- Proposed Expansion Area
- Taxlots

790 395 0 790 Feet

N W E S

MID-WILLAMETTE VALLEY COUNCIL OF GOVERNMENTS

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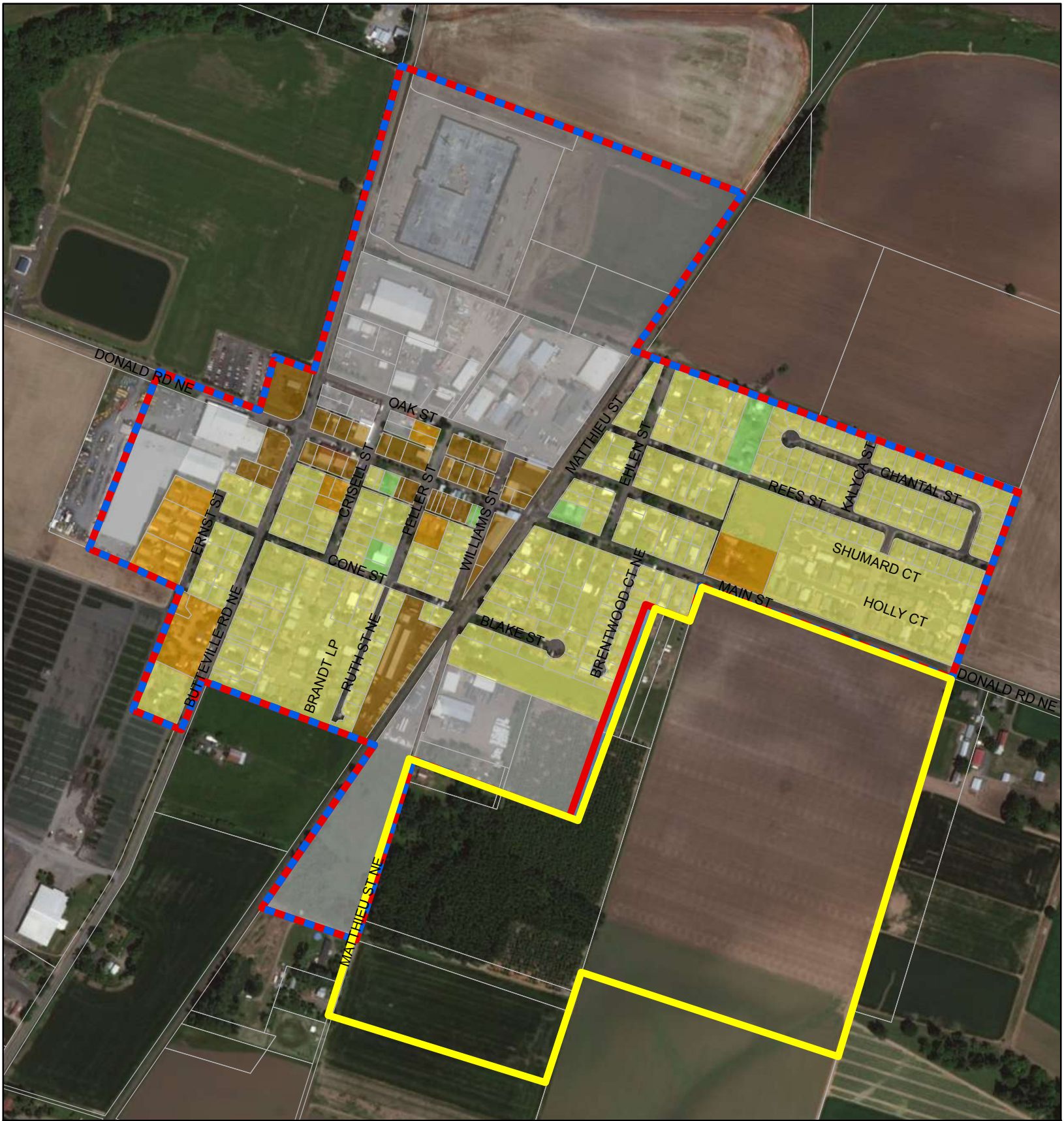
Proposed Donald UGB Expansion, 2018

ATT. A2

87.6 Acres Total: 76.7 Acres Residential, 10.9 Acres Public Facility



Legend

- UGB
- City Limits
- Proposed Expansion Area
- Taxlots

Zoning

- C- Commercial
- EI- Employment/Industrial
- I- Industrial
- P- Public
- R7- Single Family Residential
- RM- Multiple Family Residential
- UTF- Urban Transition Farm

800 400 0 800 Feet

N W E S

MID-WILLAMETTE VALLEY COUNCIL OF GOVERNMENTS

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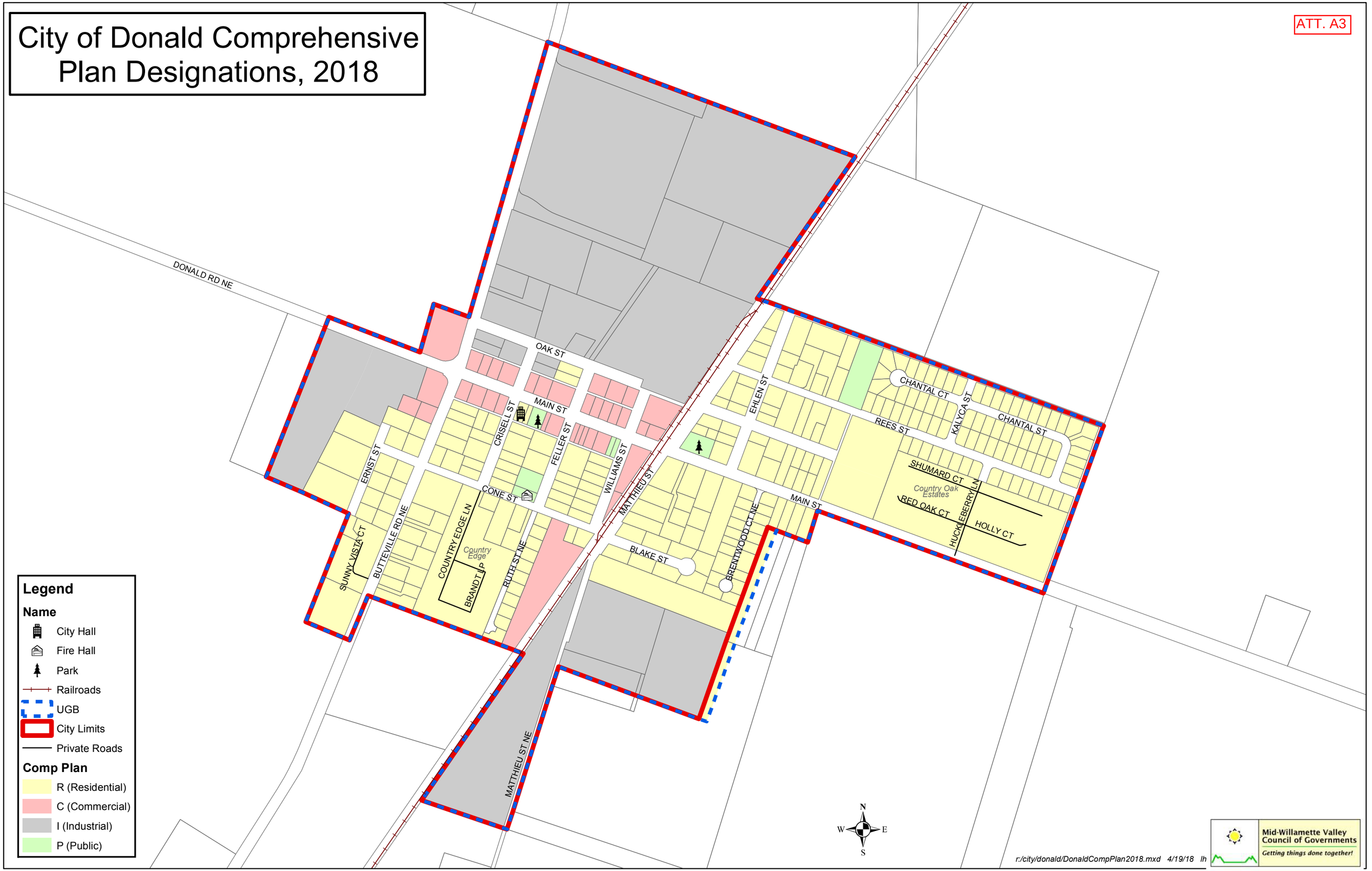
City of Donald Comprehensive Plan Designations, 2018

ATT. A3



Legend

Name

- City Hall
- Fire Hall
- Park
- Railroads
- UGB
- City Limits
- Private Roads

Comp Plan

- R (Residential)
- C (Commercial)
- I (Industrial)
- P (Public)

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Mid-Willamette Valley Council of Governments
Getting things done together!

ATT. A4

City of Donald Comprehensive Plan Designations and Proposed UGB Expansion, 2018

DONALD RD NE
OAK ST
MAIN ST
CRISELL ST
FELLER ST
WILLIAMS ST
MATTHIEU ST
ERNST ST
CONE ST
BUTTEVILLE RD NE
SUNNY VISTA CT
COUNTRY EDGE LN
Country Edge
BRANDT LP
RUTH ST NE
BLAKE ST
BRENTWOOD CT NE
MATTHIEU ST NE
EHLEN ST
CHANTAL CT
CHANTAL ST
KALYCA ST
REES ST
SHUMARD CT
SHUMARD LN
Country Oak Estates
RED OAK CT
HUCKLEBERRY LN
HOLLY CT

Legend

Name

- City Hall
- Fire Hall
- Park
- Railroads
- UGB
- City Limits
- Proposed Expansion
- Private Roads

Comp Plan

- R (Residential)
- C (Commercial)
- I (Industrial)
- P (Public)

N
W E
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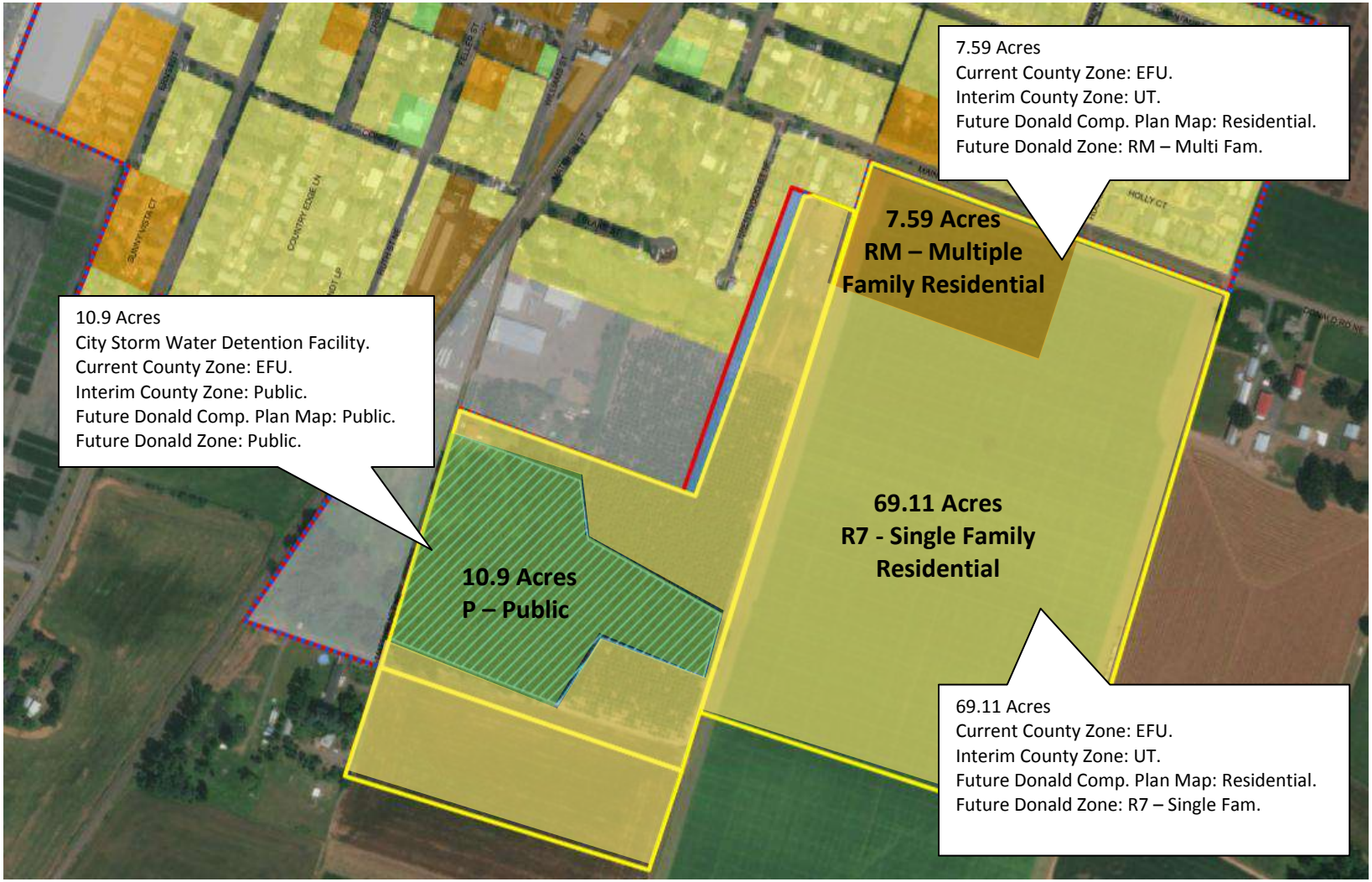
Mid-Willamette Valley Council of Governments
Getting things done together!

ATT. A5

DONALD UGB EXPANSION PROPOSED FUTURE ZONE DESIGNATIONS, 2018



ATT. A6

Alternative A

Note: Not to scale. Areas are approximate.

ATT. A6

Alternative B

Note: Not to scale. Areas are approximate.

ATT. A6

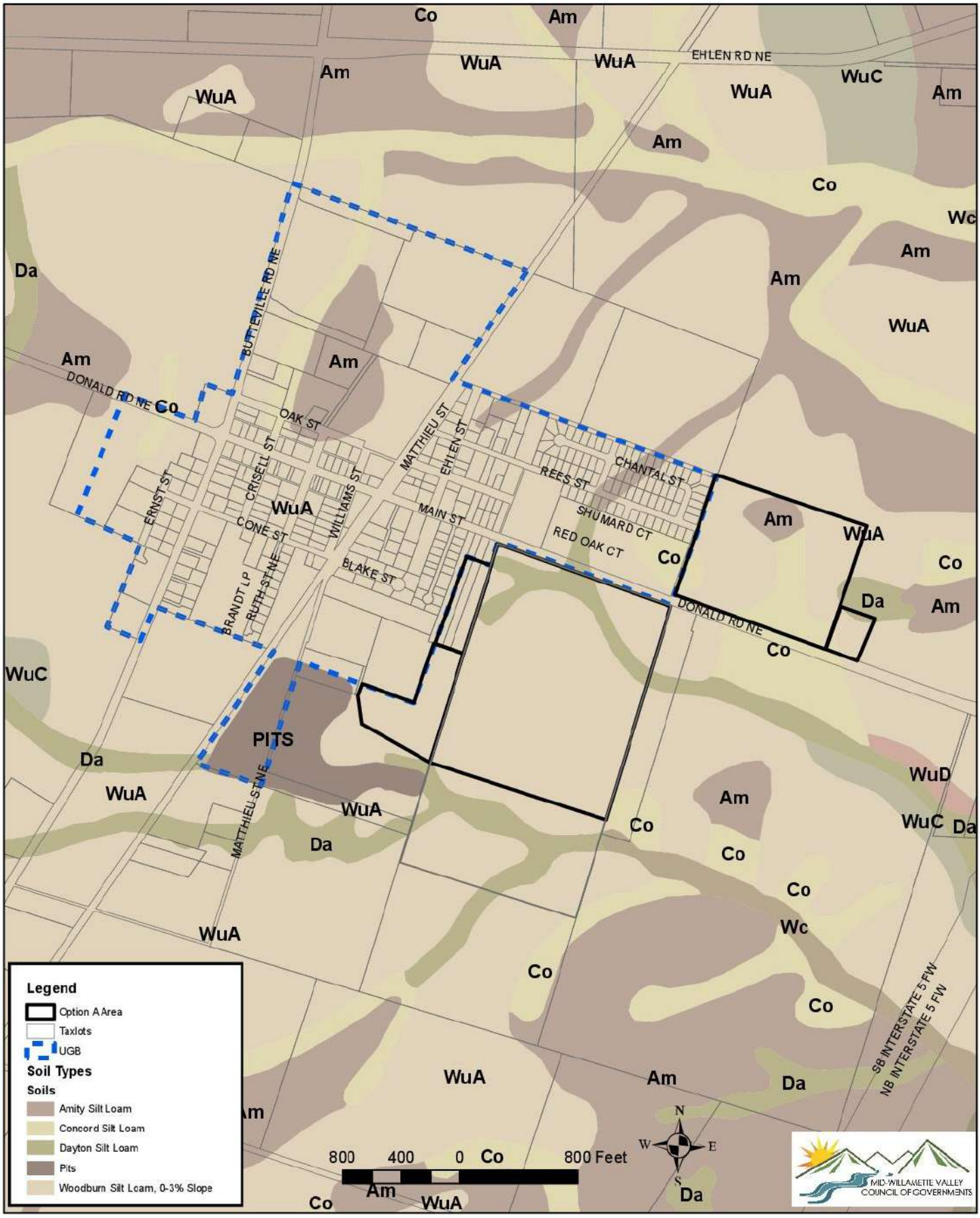
Alternative C

Note: Not to scale. Areas are approximate.

ATT. A7

ALTERNATIVE A

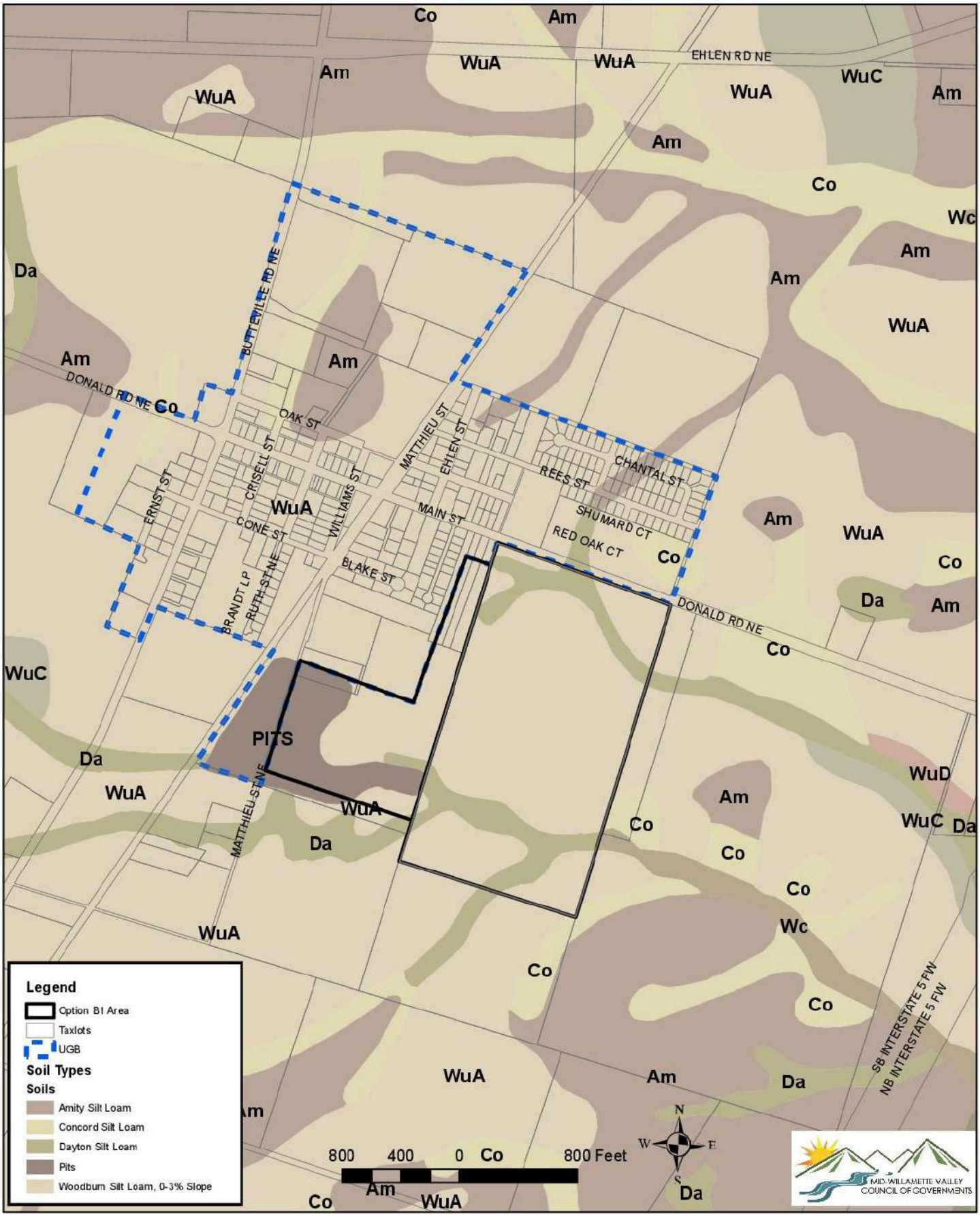
SOILS: 86% PRIME, 14% HIGH VALUE



ATT. A7

ALTERNATIVE B

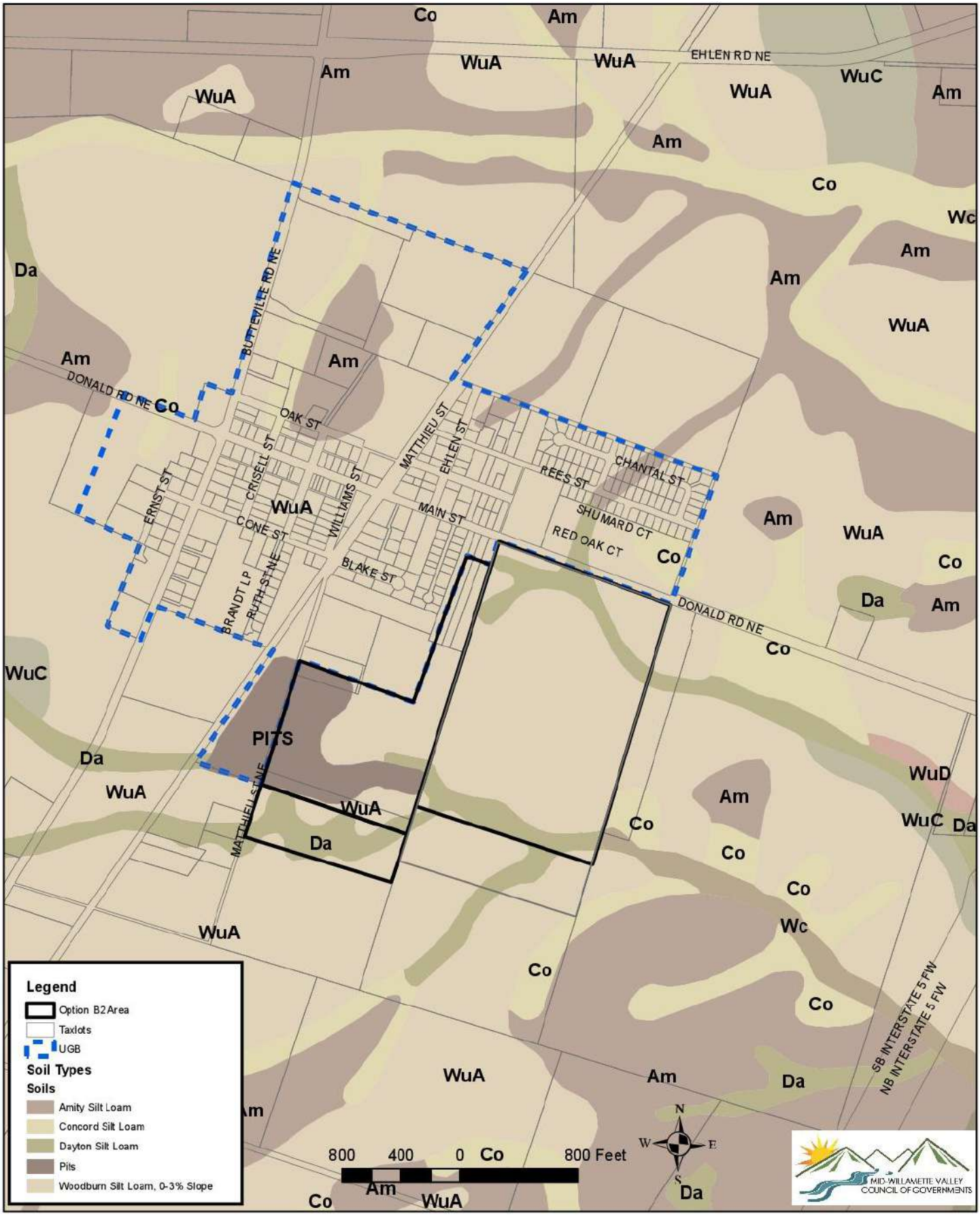
SOILS: 84% PRIME, 16% HIGH VALUE



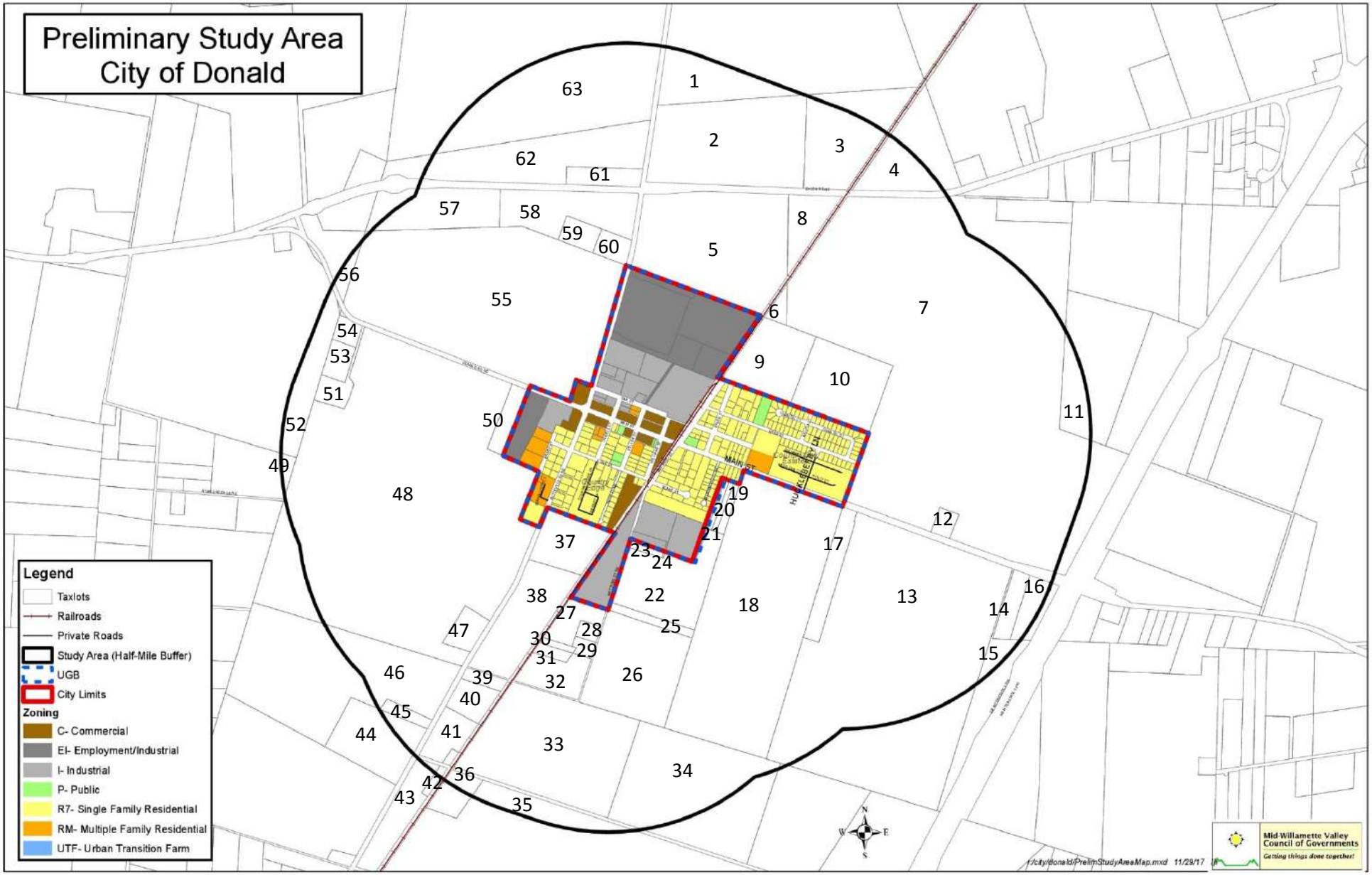
ATT. A7

ALTERNATIVE C

SOILS: 79% PRIME, 21% HIGH VALUE



ATT. B1


Preliminary Study Area
City of Donald
Legend
Taxlots
Railroads
Private Roads
Study Area (Half-Mile Buffer)
UGB
City Limits
Zoning
C- Commercial
EI- Employment/Industrial
I- Industrial
P- Public
R7- Single Family Residential
RM- Multiple Family Residential
UTF- Urban Transition Farm
MAIN ST
HUBBARD AVE
Mid-Willamette Valley Council of Governments
Getting things done together!

Soils, City of Donald

ATT. B2

Legend

- Railroads
- Study Area (Half-Mile Buffer)
- UGB
- City Limits
- Private Roads
- Taxlots

Zoning

- C- Commercial
- EI- Employment/Industrial
- I- Industrial
- P- Public
- R7- Single Family Residential
- RM- Multiple Family Residential
- UTF- Urban Transition Farm

Soils

- Amity Silt Loam
- Concord Silt Loam
- Dayton Silt Loam
- Holcomb Silt Loam
- Pits
- Terrace Escarpments
- Water
- Wapato Silty Clay Loam
- Woodburn Silt Loam, 0-3% Slope
- Woodburn Silt Loam, 3-12% Slope
- Woodburn Silt Loam, 12-20% Slope

Mid-Willamette Valley Council of Governments
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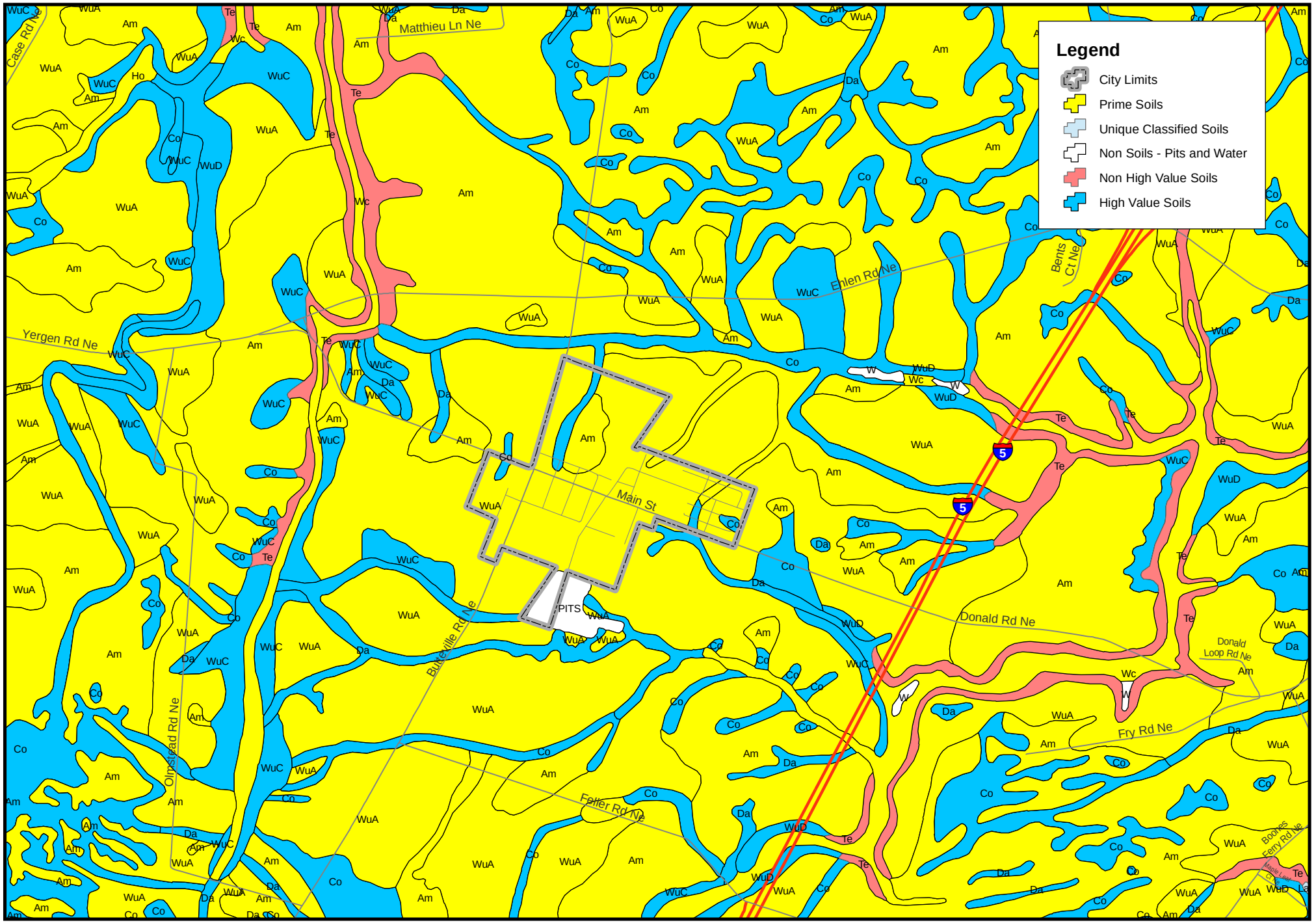
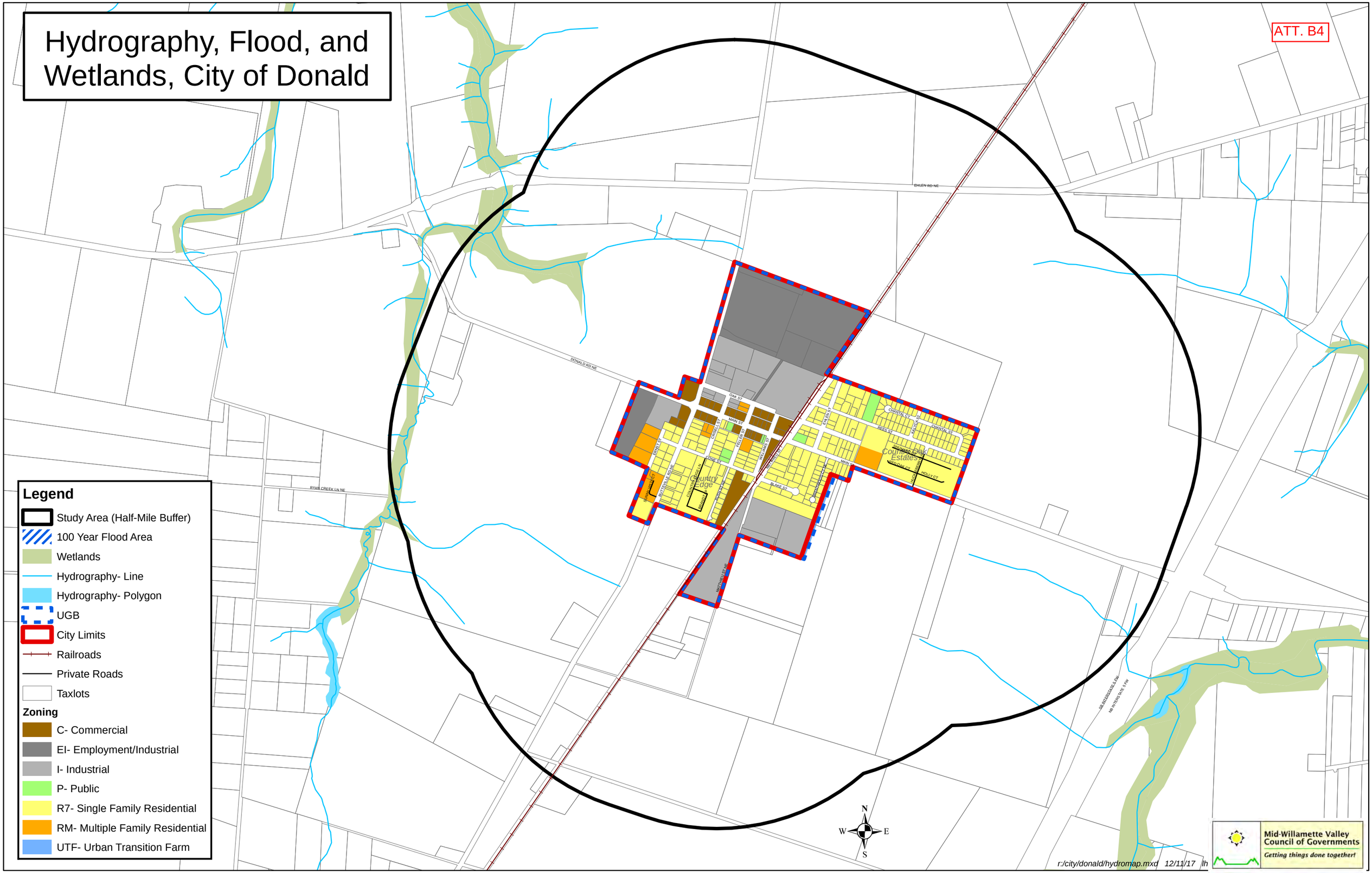
City of Donald Soils

ATT. B3

Prepared By: BPearson

Project: U:\GISProjects\PublicWorks\Planning\Donald_Soils.mxd





Hydrography, Flood, and Wetlands, City of Donald
ATT. B4
Legend
Study Area (Half-Mile Buffer)
100 Year Flood Area
Wetlands
Hydrography- Line
Hydrography- Polygon
UGB
City Limits
Railroads
Private Roads
Taxlots
Zoning
C- Commercial
EI- Employment/Industrial
I- Industrial
P- Public
R7- Single Family Residential
RM- Multiple Family Residential
UTF- Urban Transition Farm
EHLEN RD NE
DONALD RD NE
RYAN CREEK LN NE
OAK ST
MAIN ST
CHRISEL ST
FELLER ST
WILLIAMS ST
CONE ST
BLAKE ST
EHLEN ST
CHANTAL CT
CHANTAL ST
REES ST
HOLLY CT
Country Edge
Country Oak Estates
N
S
E
W
Mid-Willamette Valley Council of Governments
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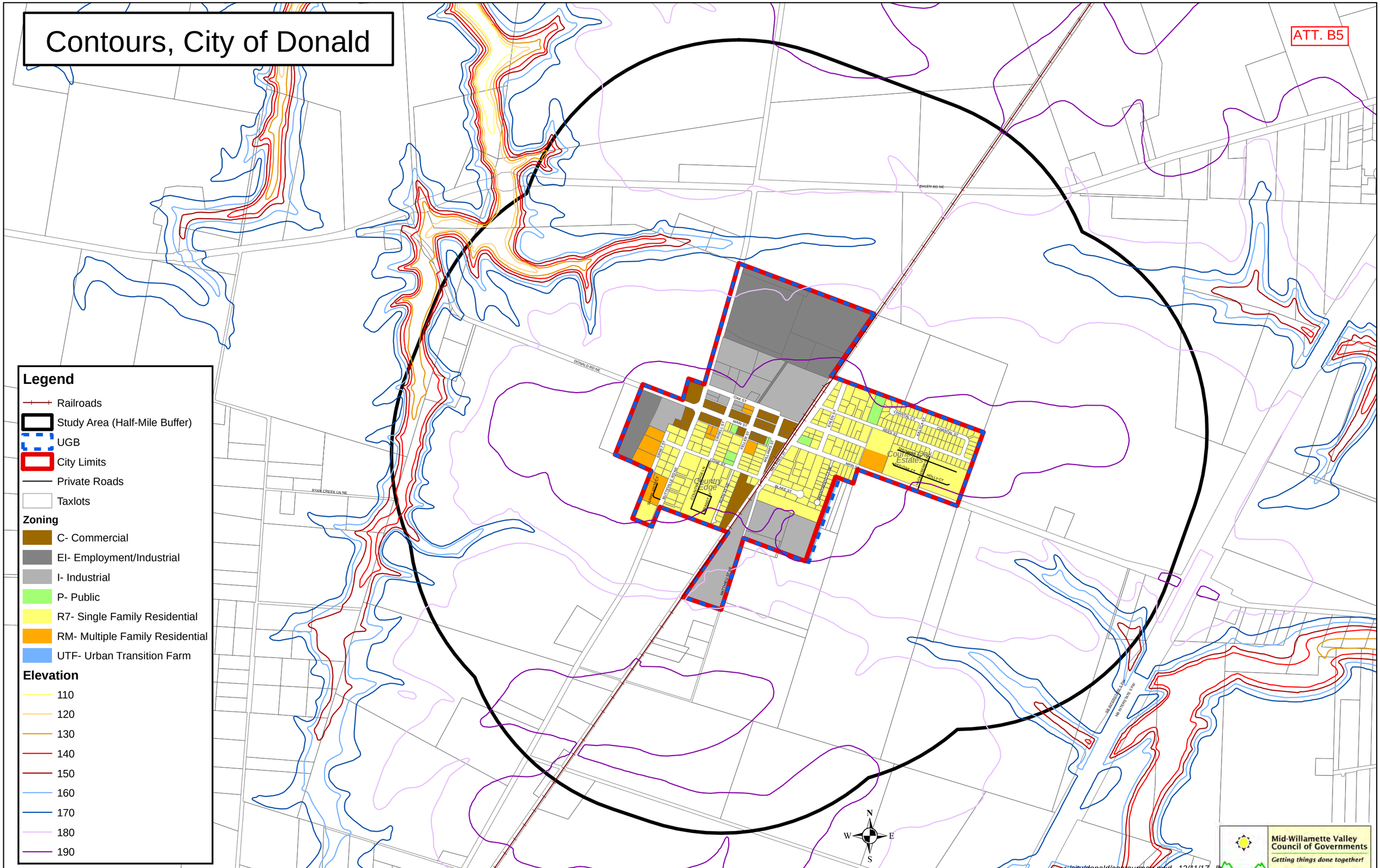
r:/city/donald/hydromap.mxd 12/11/17 lh



Contours, City of Donald
ATT. B5
Legend
Railroads
Study Area (Half-Mile Buffer)
UGB
City Limits
Private Roads
Taxlots
Zoning
C- Commercial
EI- Employment/Industrial
I- Industrial
P- Public
R7- Single Family Residential
RM- Multiple Family Residential
UTF- Urban Transition Farm
Elevation
110
120
130
140
150
160
170
180
190
DONALD RD NE
EHLEN RD NE
RYAN CREEK LN NE
Country Oak Estates
Country Edge
N
S
E
W
Mid-Willamette Valley Council of Governments
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r:/city/donald/contourmap.mxd 12/11/17 lh

ATT. B6

0.5 MILE MARGIN
TYPICAL

CITY OF DONALD

EXISTING URBAN GROWTH BOUNDARY

SCALE: 1" = 500'

BAR IS ONE INCH ON ORIGINAL DRAWING.

ADJUST SCALE AS SHOWN ACCORDINGLY.

PRELIMINARY
DECEMBER 2017

CURRAN-McLEOD, INC.
CONSULTING ENGINEERS

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ATT. B6

CITY OF DONALD

WATER BASE MAP

SCALE: 1" = 200'

PRELIMINARY

DECEMBER 2017

CURRAN-McLEOD, INC.
CONSULTING ENGINEERS

BAR IS ONE INCH ON ORIGINAL DRAWING.

ADJUST SCALE AS SHOWN ACCORDINGLY.

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ATT. B6

CITY OF DONALD

SANITARY SEWER BASE MAP

SCALE: 1" = 200'

PRELIMINARY
DECEMBER 2017

BAR IS ONE INCH ON ORIGINAL DRAWING.
ADJUST SCALE AS SHOWN ACCORDINGLY.

CURRAN-McLEOD, INC.
CONSULTING ENGINEERS

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ATT. C

DATE: March 26, 2018
FROM: Curt McLeod, Curran McLeod Engineering

PUBLIC FACILITIES

The City of Donald has made good progress in developing public utilities in the past few decades. The water source wells have been relocated to acceptable locations with proper seal construction and protection boundary. Treatment and storage facilities are in-place to provide water that meets the required quality and quantity demands.

The water distribution system is supported by a jockey pump system, with multiple pumps and separate fire flow supply pump. A network of 6", 8", 10" and 12" pipe has been constructed throughout the City limits capable of meeting domestic and fire flow demands.

Water system improvements are defined in the most recent 2016 Capital Improvement Plan to improve source redundancy, upgrade pumping and auxiliary power systems, improve the office facilities and complete looping of some dead ended lines. No improvements are mandated as a result of demands, but rather a result of long-term system performance.

The wastewater system utilizes septic tank effluent pumping (STEP) systems, lagoon treatment with winter storage, and summer irrigation for disposal. The collection system is comprised of a network throughout the City Limits of 6" force mains, which provide substantial surplus capacity.

Although the collection system has sufficient surplus capacity for any UGB expansion alternatives, the lagoon treatment and irrigation facilities are currently at capacity and will require expansion with any alternative selected.

The stormwater system is less developed, and depends largely on roadside ditches. There are some piped collection system improvements and one detention facility with substantial surplus capacity located in the SE quadrant of the City limits. The three UGB expansion alternatives will all three be well served by the existing detention and disposal facility.

In an overview, the entire area of the City limits has a well developed network of public infrastructure capable of supporting additional development.

The 2018 expansion of the Urban Growth Boundary is considering three alternative locations, all of which are located in the southeast quadrant of the City. Regardless which of the three alternatives is selected, the sites are easily developed and specific infrastructure requirements can easily be accommodated with the existing systems.

UGB EXPANSION ALTERNATIVE A:

This alternative includes property both north and south of Main Street (Donald Road NE). Of the three alternatives, this has more challenging utility requirements due to the dependence on Main Street as the only location for all utility service and access. Although Main Street has large water and sanitary sewer pipelines, transportation and water system improvements would be difficult to loop due to limited access to additional streets. Localized looping can be provided, but would still be solely dependent on the Main Street connection.

The utilities are adequately sized in Main Street to support the proposed expansion area without additional expense. Frontage improvements would be somewhat higher than the other two alternatives due to development of one side of the street, as opposed to improvements that would benefit both sides.

UGB EXPANSION ALTERNATIVE B:

This alternative has the benefit of utility connections to both Main Street and Matthieu Street, each of which has large water and sewer pipelines that can support growth. This alternative includes access to the stormwater detention facility that would accommodate all runoff. Utility improvements for Option B are all easily provided without unusual expense. This alternative would provide opportunities to loop water and transportation improvements.

UGB EXPANSION ALTERNATIVE C:

Alternative C has all characteristics defined for Option B. This option has frontage on two roadways, each with fully developed water and sewer pipelines easily capable of serving the area. This alternative would provide opportunities to loop water and transportation improvements.

ATT. D

City of Donald UGB Expansion

Transportation Impact Study

Donald, Oregon

Date:
April 19, 2018

Prepared for:
Heidi Bell, City Manager
City of Donald

Prepared by:
Kaitlin Littleford, EI
Daniel Stumpf, EI
Todd Mobley, PE

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Executive Summary

1. The City of Donald is proposing an amendment to its Urban Growth Boundary (UGB) to include approximately 77 acres to accommodate a mix of multi-family and single-family homes to support the City's population growth. After annexation of the properties within the UGB expansion area into the City of Donald, up to 78 units of multi-family housing and 387 detached single-family dwellings could be developed.
2. The trip generation calculations show that the development of the UGB expansion area is projected to generate 322 site trips during the morning peak hour and 427 site trips during the evening peak hour.
3. The intersections of Donald Road/Main Street NE at Huckleberry Lane NE and Butteville Road NE at Donald Road/Main Street NE are projected to operate acceptably through the year 2034, with or without development related to the UGB expansion. No mitigations are proposed at these intersections.
4. The intersection of Main Street NE at Matthieu Street NE will carry a minority of traffic from the expansion area and will operate acceptably with its current configuration. No mitigations at this intersection are proposed.
5. No mitigation is recommended on any local roadways under the jurisdiction of the City of Donald.
6. The intersection of Ehlen Road NE at Butteville Road NE will not meet operational standards in the year 2034, with or without the addition of site trips related to the proposed UGB expansion. The Marion County Rural Transportation System Plan (TSP) shows the need for improvements at this intersection. The County is currently considering a roundabout or a traffic signal, either of which would improve operation to acceptable levels.
7. The intersections of Ehlen Road NE at Bents Court NE and Ehlen Road NE at Bents Road NE will not meet operational standards in the year 2034, with or without the addition of site trips related to the proposed UGB expansion. Realignment of Bents Road NE to meet Bents Court NE is planned in the Marion County Rural TSP, along with signalization of the new intersection. After completion of these improvements, the intersection is projected to operate acceptably through year 2034, with or without the addition of trips related to the proposed UGB expansion.
8. The intersections of Ehlen Road NE at the I-5 ramps currently fail to meet operational standards. The process of planning and designing improvements to the interchange has begun in the Oregon Department of Transportation (ODOT) Interchange Area Management Plan (IAMP).

Introduction

The City of Donald is proposing an amendment to its Urban Growth Boundary (UGB) to include approximately 77 acres for residential development. The residential development will support the expected increase in the city's population, from approximately 985 residents in 2018 to 2,085 residents in 2034. The properties that comprise the UGB expansion's preferred location are located south and east of the existing city limits.

The purpose of this report is to examine the potential traffic impacts of the UGB expansion and future development of the expanded area. The report will include a long-term analysis that addresses the operation of each of the study intersections in order to ensure the transportation system is capable of safely and efficiently supporting the existing uses and proposed UGB expansion.

All supporting data and calculations are included in the appendix to this report.

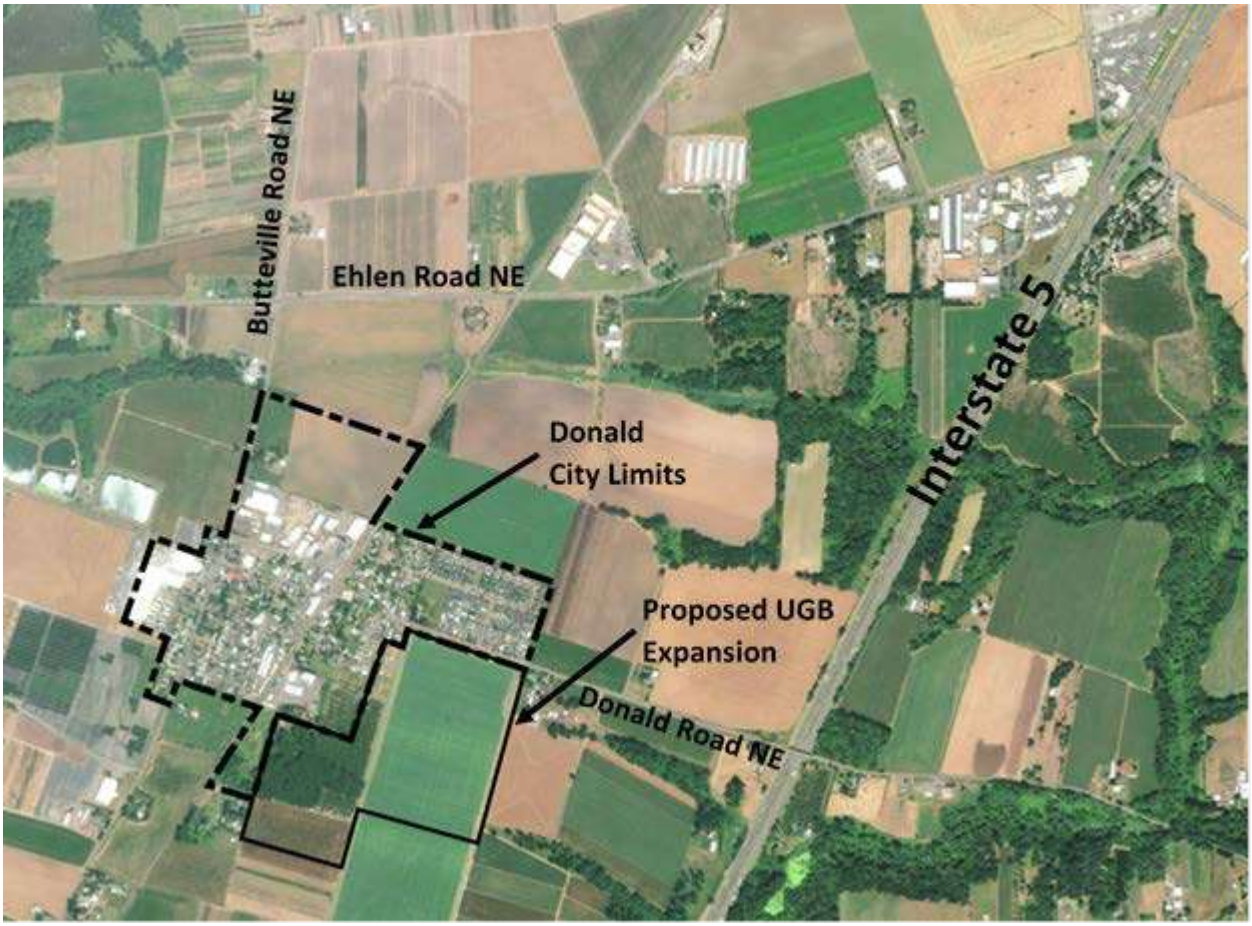
Project and Location Description

The preferred location for the UGB expansion is located south and east of the existing UGB and city limits, south of Donald Road/Main Street NE and east of Matthieu Street NE. The project area and preferred UGB expansion area are shown in Figure 1. The existing UGB is shown by the dotted line, and the preferred expansion area is shown by the solid line.

Based on the location of the preferred UGB expansion area and the expected trip generation from eventual development in the area, as well as input from the City of Donald and Marion County, the following intersections were selected for analysis of projected morning and evening peak hour traffic impacts:

- Donald Road/Main Street NE at Huckleberry Lane NE
- Butteville Road NE at Donald Road/Main Street NE
- Ehlen Road NE at Butteville Road NE
- Ehlen Road NE at Bents Court NE
- Ehlen Road NE at Bents Road NE
- I-5 southbound ramps at Ehlen Road NE
- I-5 northbound ramps at Ehlen Road NE

Figure 1 – Project Location and Vicinity



Vicinity Streets

The proposed development is expected to predominantly impact the following vicinity roadways: Huckleberry Lane NE, Donald Road/Main Street NE, Butteville Road NE, Ehlen Road NE, Bents Court NE, Bents Road NE, and I-5. Huckleberry Lane NE is a private roadway that is not owned or maintained by the City or County. Characteristics of the study roadways are shown in Table 1.

Table 1 – Study Roadway Characteristics

Street Name	Jurisdiction	Functional Classification	Speed (mph)	Curbs & Sidewalks	On-Street Parking	Bicycle Lanes
Interstate 5	ODOT	Interstate	65	N	N	N
Ehlen Road NE	Marion County	Principal Arterial	35 near I-5, 45-55 elsewhere	N	N	N
Butteville Road NE	Marion County	Major Collector	55 near Ehlen Road, 40 in City Limits, 25 in residential areas	N	N	N
Donald Road NE (Main Street NE)	Marion County	Minor Collector	25, 45 east of 11101 Main Street NE	Intermittent	Intermittent	N
Bents Road NE	Marion County	Minor Collector	55	N	N	N
Bents Court NE	Marion County	Local Roadway	20	Y	N	N
Huckleberry Lane NE	Private	Local Roadway	25	Y	N/A	N

Study Intersections

Characteristics of the study intersections are shown in Table 2.

Table 2 – Study Intersection Characteristics

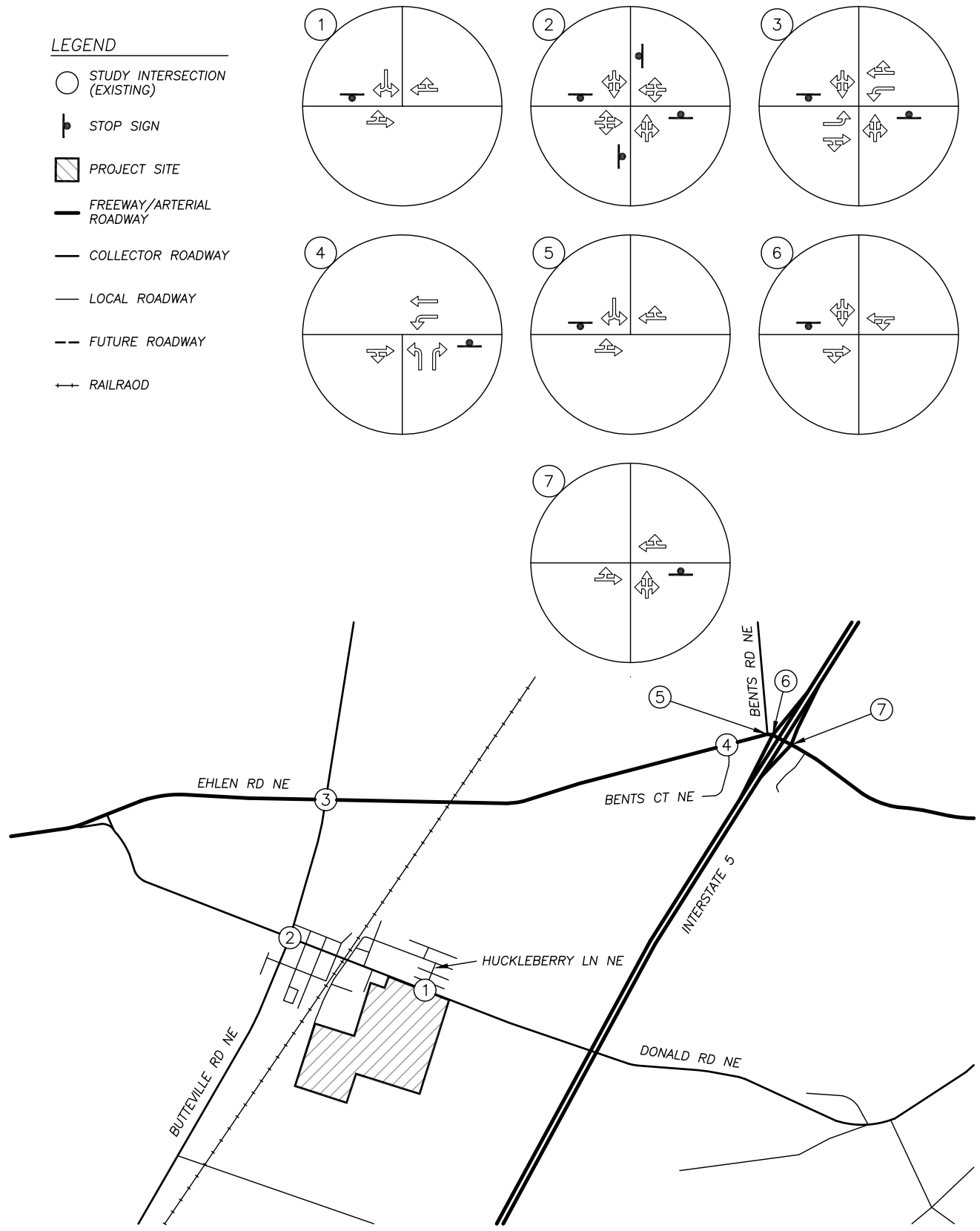
Intersection	Jurisdiction	Control Type
Donald Road NE at Huckleberry Lane NE	Marion County	Stop Control (north leg)
Butteville Road NE at Donald Road NE	Marion County	Stop Control (all legs)
Ehlen Road NE at Butteville Road NE	Marion County	Stop Control (south leg)
Ehlen Road NE at Bents Court NE	Marion County	Stop Control (south leg)
Ehlen Road NE at Bents Road NE	Marion County	Stop Control (north leg)
Ehlen Road NE at I-5 Southbound Ramps	ODOT	Stop Control (north leg)
Ehlen Road NE at I-5 Northbound Ramps	ODOT	Stop Control (south leg)

Figure 2 on page 6 shows a vicinity map displaying the project site, vicinity streets, and intersection configurations.

Traffic Counts

Traffic counts were conducted at six of the study intersections on Thursday, February 15, 2018, from 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. At the intersection of Ehlen Road NE at Bents Court NE, traffic counts were conducted on Tuesday, February 27, 2018, from 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. Counts were collected by a third-party company. Individual vehicle, pedestrian, and bicycle movements were counted at each intersection. Data from each intersection's morning and evening peak hours were used. Detailed count summaries are provided in the appendix.

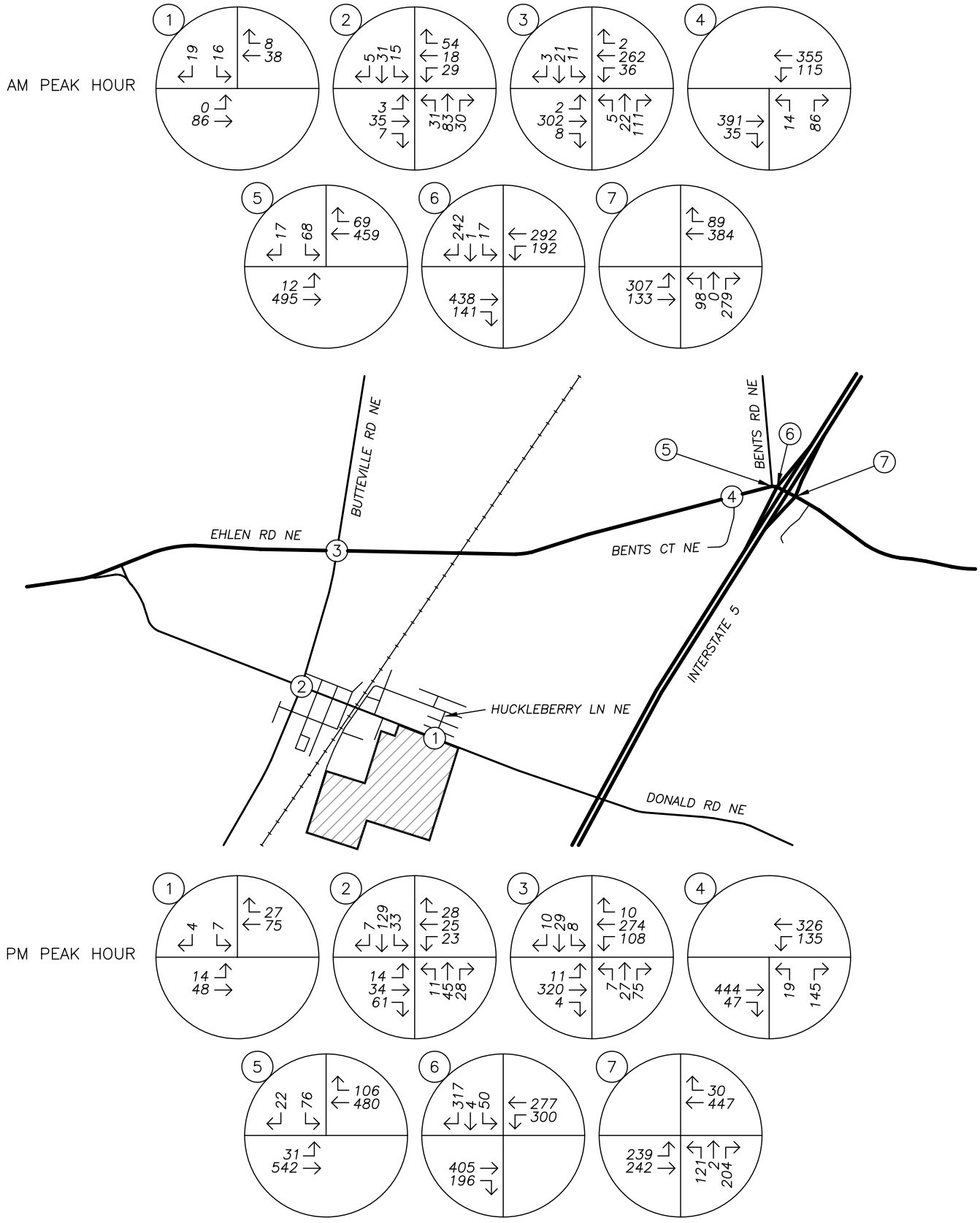
Figure 3 on page 7 shows existing morning and evening peak hour traffic volumes at each of the study intersections.



VICINITY MAP

no scale

FIGURE 2



TRAFFIC VOLUMES
Existing Conditions
AM & PM Peak Hours

no scale

FIGURE 3

Development Within the Expansion Area

This section describes the expected scale and type of development within the proposed UGB expansion area, including assumptions used in the analysis such as access locations and street connections within the expansion area.

Trip Generation

Upon expanding the UGB, the expansion area is expected to develop with urban-scale residential land-uses. The number of dwelling units that could be constructed was determined using the Buildable Land Inventory (BLI) and Housing Needs Analysis (HNA) conducted in 2014 and adopted in 2015. The population of Donald is projected to be 2,085 in the year 2034. Assuming there are 2.55 persons per household, 78 new multi-family units and 387 single-family dwellings could be constructed.

To estimate the number of trips that will be generated by the proposed development, trip rates from the *Trip Generation Manual*[1] were used. The *Trip Generation Manual* contains trip generation rates, in this case a trip rate per housing unit, based on data from site observations across the United States. Separate rates are provided in the manual for the morning peak hour, evening peak hour, and an entire weekday, all of which were used to calculate trip generation in this report. Data and trip rates corresponding to land use codes 210, *Single-Family Detached Housing*, and 220, *Multi-Family Housing (Low-Rise)*, were used to estimate the proposed development's trip generation based on the number of dwelling units for each housing type discussed above.

The trip generation calculations show that the potential development could generate 322 site trips during the morning peak hour and 427 site trips during the evening peak hour of a typical weekday. A total of 4,224 trips is projected be generated throughout a single typical weekday. Trip generation estimates are summarized in Table 3. Detailed trip generation calculations are included in the appendix to this report.

Table 3 – Trip Generation Summary

Land Use Code	Units	Morning Peak Hour			Evening Peak Hour			Weekday Total
		In	Out	Total	In	Out	Total	
210 - Single-Family Detached Housing	387	72	214	286	241	142	383	3,654
220 - Multi-Family Housing (Low-Rise)	78	8	28	36	28	16	44	570
Total	**465**	**80**	**242**	**322**	**269**	**158**	**427**	**4,224**

[1] Institute of Transportation Engineers (ITE), *TRIP GENERATION MANUAL*, 10th Edition, 2017.

Access Locations

The primary point of access to the expansion area is expected to be on Donald Road/Main Street NE, opposite the existing intersection of Huckleberry Lane NE. As the expansion areas are annexed into the City and proposed for development, care should be taken to the design of this intersection, since the north leg of the intersection is a private street. Currently there is no gate or other public-use restrictions. The expansion area is not expected to add any significant volume of traffic to Huckleberry Lane NE to the north of Donald Road/Main Street NE.

Access is also expected to be taken to Matthieu Street NE, likely in two locations. There is an existing property that is currently within the City of Donald and zoned for residential use that could provide one access location. A second access to Matthieu Street NE near the southwest corner of the expansion area is expected. Between those two potential accesses is a regional stormwater facility that is within the expansion area but is not developable.

The expansion area is generally divided between the northern area, which is more conveniently accessed via Donald Road/Main Street NE, and the southwestern area, which will have convenient access to Matthieu Street NE. The amount of traffic using each access will be dependent on specific development types and patterns, but the majority of traffic will be to and from Donald Road/Main Street NE. As the expansion area develops, there will be an internal street network that will connect between the north and southwest accesses.

For the purposes of this report, it was assumed that 75 percent of trips generated by development of the UGB expansion area will travel through the intersection of Donald Road/Main Street NE at Huckleberry Lane NE, and the remaining 25 percent will travel through intersection of Donald Road/Main Street NE at Matthieu Street NE.

Trip Distribution

The directional distribution of site trips to and from the UGB expansion area was estimated based on likely trip destinations, locations of major transportation facilities in the site vicinity, and existing travel patterns at the study area intersections.

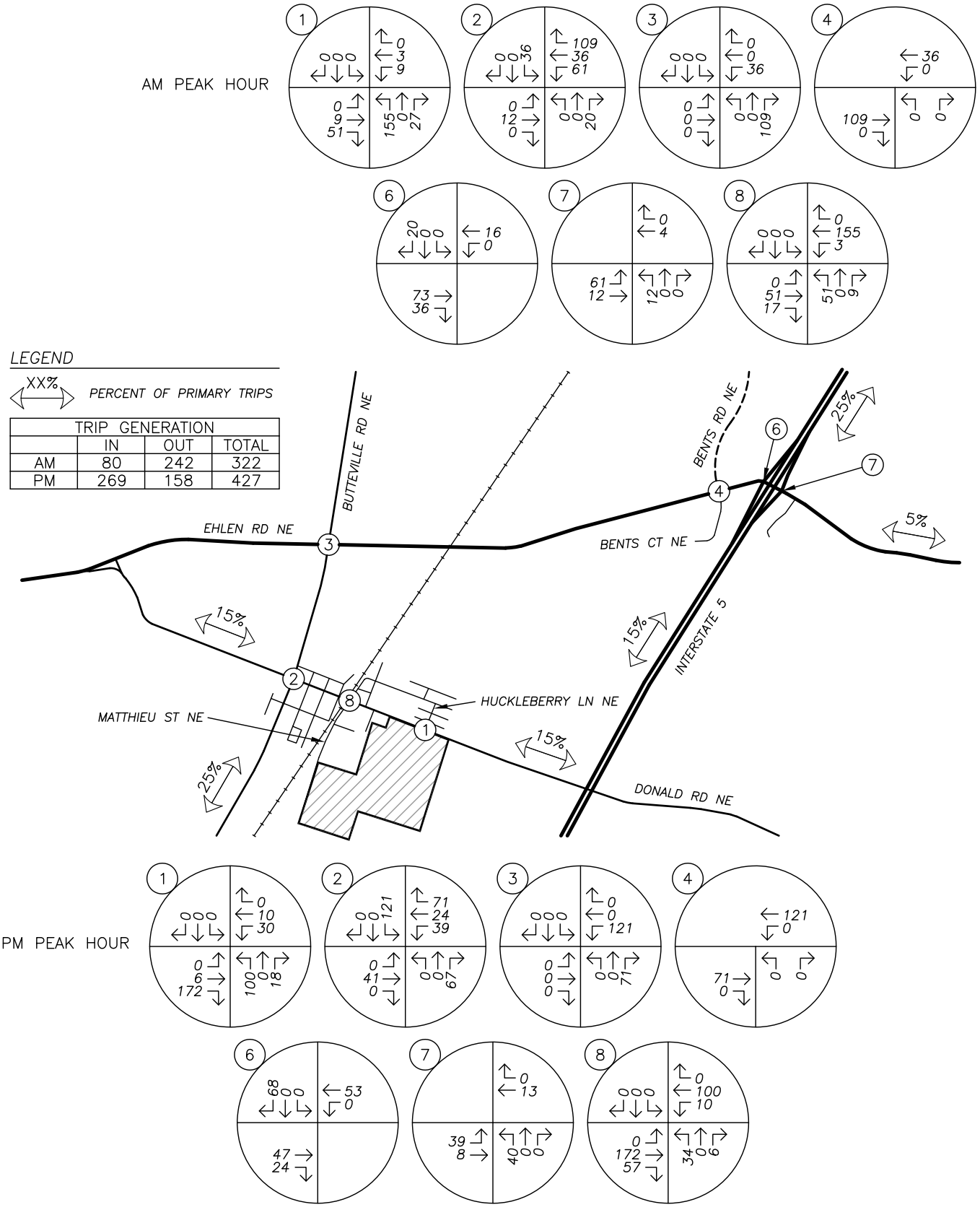
The following trip distribution was estimated and used for analysis:

- Approximately 15 percent of site trips will travel to/from the west along Donald Road/Main Street NE,
- Approximately 15 percent of site trips will travel to/from the east along Donald Road/Main Street NE,
- Approximately 25 percent of site trips will travel to/from the south along Butteville Road NE,
- Approximately 15 percent of site trips will travel to/from the south along I-5 (via Ehlen Road NE),

- Approximately 25 percent of site trips will travel to/from the north along I-5 (via Ehlen Road NE, and
- Approximately 5 percent of site trips will travel to/from the east along Ehlen Road NE.

It is estimated that a nominal percentage of site trips will travel to/from the north along Butteville Road NE, as the roadway does not lead to any significant day-to-day transportation facilities or destinations. It is also estimated that a nominal percentage of site trips will travel along Bents Road NE or Bents Court NE. It was assumed that trips to and from the west of the UGB expansion area will use Donald Road/Main Street NE rather than Ehlen Road NE, since Donald Road/Main Street NE provides a more direct connection to the intersection of Donald Road NE at Ehlen Road NE/Yergen Road NE.

The trip assignment for the morning and evening peak hour site trips generated by the proposed UGB expansion and subsequent potential development are shown in Figure 4 on page 11. Figure 4 shows only those trips generated by the potential development in the UGB expansion area. These trips are added to projected future traffic volumes in the *Future Traffic Volumes* section below.



TRAFFIC VOLUMES
Site Trips
AM & PM Peak Hours

no scale

FIGURE 4

Future Traffic Volumes

To provide analysis of the impact of the proposed development on the nearby transportation facilities, an estimate of future traffic volumes is required. In collaboration with the City of Donald, the Mid-Willamette Valley Council of Governments (MWVCOG), and Marion County, a 2034 planning horizon analysis year was determined, since projections of population growth and the number of required housing units were completed for the year 2034.

In order to calculate the future traffic volumes at the study intersections, a compounded growth rate of 2.4 percent per year was applied to the measured existing traffic volumes to approximate year 2034 background conditions. The growth rate was determined by averaging compounded growth rates between Marion County's 2011 traffic counts and 2032 traffic volume projections from the Rural TSP.

Planned Improvements

The realignment of Bents Road NE to comprise a north leg of the intersection of Ehlen Road NE at Bents Court NE, and subsequent signalization of the resulting intersection, has been identified as a needed improvement in the Marion County Rural TSP,[2] and as an issue in ODOT's Aurora-Donald Interchange Area Management Plan (IAMP).[3] It is likely that the realignment of Bents Road will be completed before the planning horizon year of 2034, so analysis of this intersection in the planning horizon was conducted under this assumption.

Figure 5 on page 13 shows the projected year 2034 background traffic volumes at the study intersections during the morning and evening peak hours, with the future realignment of Bents Road NE.

Background Volumes plus Site Trips

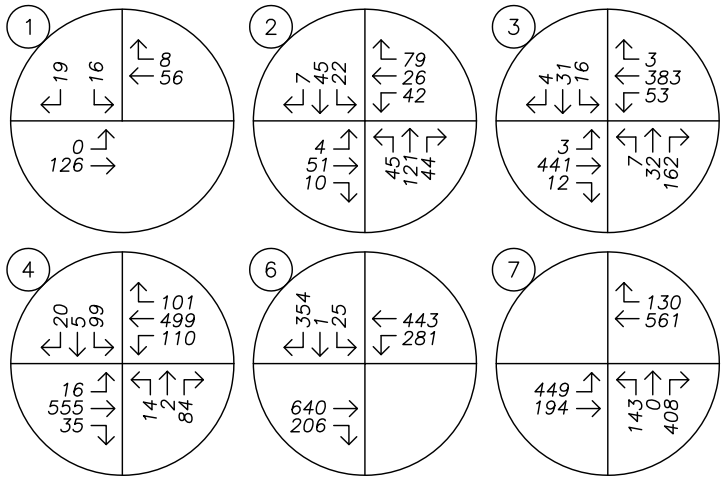
Peak hour trips calculated to be generated by the proposed UGB expansion and subsequent potential development, as described in the *Trip Distribution* section, were added to the projected year 2034 background traffic volumes to obtain the expected 2034 background volumes plus site trips.

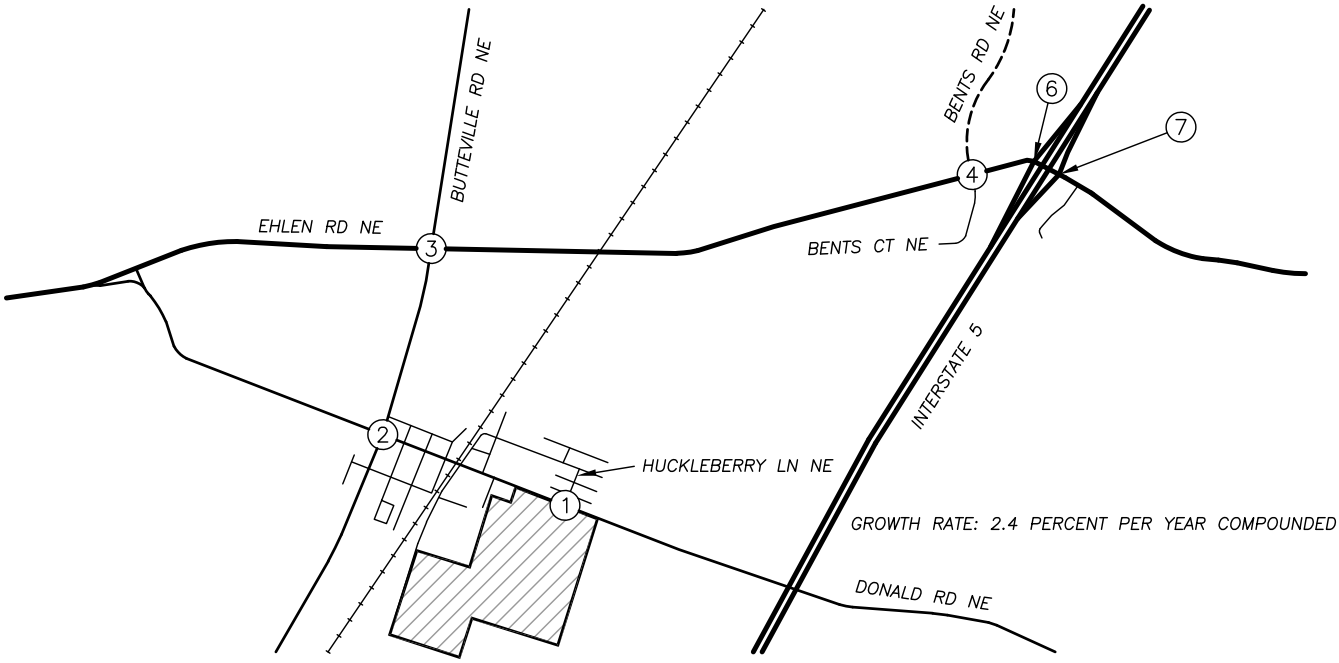
Figure 6 on page 14 shows the projected year 2034 peak hour background traffic volumes plus proposed development site trips at the study intersections during the morning and evening peak hours.

[2] Marion County, *Marion County Rural Transportation System Plan 2005 Update*, Chapter 8: Roadway System Needs and Recommended Improvements, 2005. http://www.co.marion.or.us/PW/Engineering/rtsp/Documents/chapter8roadwaysystemimprovements.pdf.

[3] ODOT, *I-5 at Aurora-Donald Interchange Project, Phase 1*, 2018. http://www.oregon.gov/odot/projects/pages/project-details.aspx?project=19062.

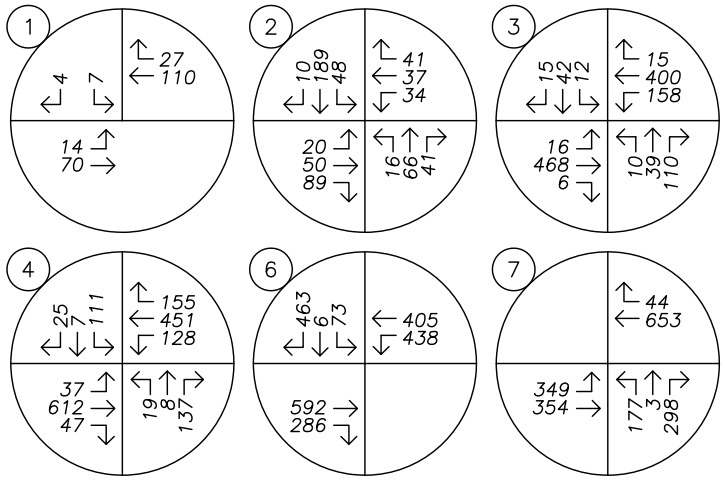
AM PEAK HOUR





GROWTH RATE: 2.4 PERCENT PER YEAR COMPOUNDED

PM PEAK HOUR

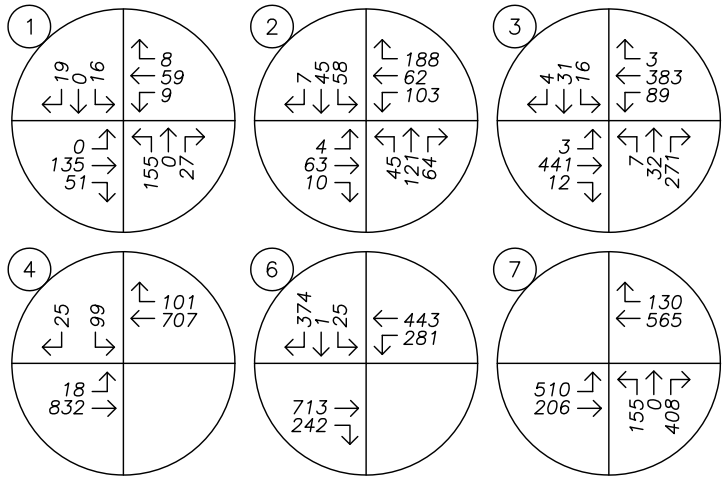


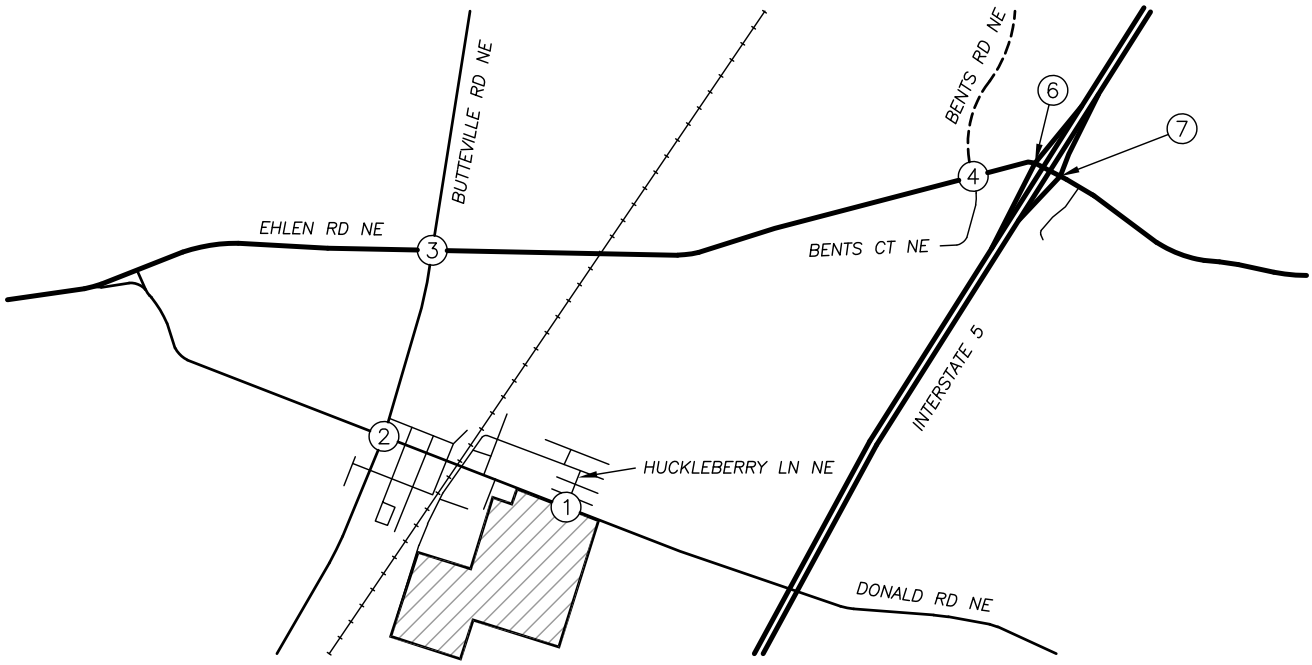
TRAFFIC VOLUMES
2034 Background Conditions
AM & PM Peak Hours

no scale

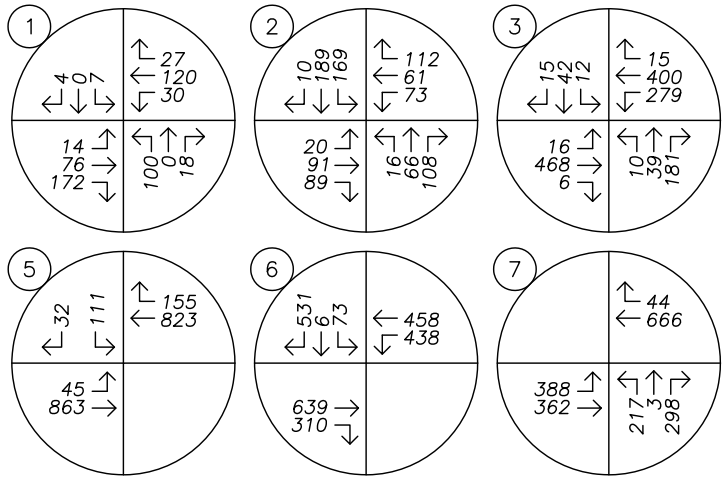
FIGURE 5

AM PEAK HOUR





PM PEAK HOUR



TRAFFIC VOLUMES
2034 Background Plus UGB Expansion Conditions
AM & PM Peak Hours

no scale

FIGURE 6

Operational Analysis

Intersection Capacity & Level of Service

A capacity analysis was conducted for each of the study intersections per the signalized and unsignalized intersection analysis methodologies in the *Highway Capacity Manual* (HCM)[4]. The level of service (LOS) of an intersection can range from LOS A, which indicates very little or no delay experienced by vehicles, to LOS F, which indicates a high degree of congestion and delay. The volume-to-capacity (v/c) ratio is a measure that compares the traffic volumes (demand) against the available capacity of an intersection.

Marion County requires that signalized and all-way stop-controlled intersections operate at LOS D or better, with individual movements operating at LOS E or better, and with a v/c ratio no greater than 0.85. Other unsignalized intersections must operate at LOS E or better; however, LOS F may be allowed if the movement serves relatively low volumes (at the discretion of County staff) and if there is no indication of a safety issue.[5]

In addition, the I-5 ramp intersections along Ehlen Road NE are under the jurisdiction of ODOT and must operate according to the standards established in the Oregon Highway Plan[6] (OHP). Per the OHP, interchange ramp terminals are required to operate with a v/c ratio of 0.85 or less.

The v/c, delay, and LOS results of the capacity analysis for morning and evening peak hours are shown in Table 4 and Table 5. Detailed calculations as well as tables showing the relationship between delay and LOS are included in the appendix to this report.

[4] Transportation Research Board, *Highway Capacity Manual*, 6th Edition, 2016.

[5] Marion County, *Traffic Impact Analysis Requirements*, 2015. http://www.co.marion.or.us/PW/Engineering/Pages/analysis.aspx.

[6] Oregon Department of Transportation, *Oregon Highway Plan: Including amendments November 1999 through May 2015*, 2015.

Table 4 – Intersection Capacity Analysis Summary

	Morning Peak Hour			Evening Peak Hour		
	LOS	Delay (s)	v/c	LOS	Delay (s)	v/c
Donald Road/Main Street NE at Huckleberry Lane NE						
2018 Existing Conditions	A	9	0.05	A	9	0.02
2034 Background Conditions	A	10	0.06	A	10	0.02
2034 Background Plus UGB Expansion	B	15	0.41	C	15	0.30
Butteville Road NE at Donald Road/Main Street NE						
2018 Existing Conditions	A	9	0.21	A	9	0.28
2034 Background Conditions	A	10	0.32	B	11	0.40
2034 Background Plus UGB Expansion	B	15	0.58	D	26	0.75
Ehlen Road NE at Butteville Road NE						
2018 Existing Conditions	C	17	0.25	C	21	0.25
2034 Background Conditions	D	33	0.48	F	57	0.61
2034 Background Plus UGB Expansion	F	55	0.71	F	>120	1.05
With Signal	A	8	0.53	A	9	0.61
With Single-Lane Roundabout	B	10	0.46	B	12	0.60

Table 5 – Intersection Capacity Analysis Summary (cont.)

	Morning Peak Hour			Evening Peak Hour		
	LOS	Delay (s)	v/c	LOS	Delay (s)	v/c
Ehlen Road NE at Bents Court NE						
2018 Existing Conditions	D	25	0.16	D	28	0.29
Ehlen Road NE at Bents Road NE						
2018 Existing Conditions	D	32	0.40	E	35	0.46
Ehlen Road NE at Bents Court NE (After Realignment of Bents Road NE)						
2034 Background Conditions	C	22	0.77	C	26	0.76
2034 Background Plus UGB Expansion	C	25	0.83	C	28	0.83
Ehlen Road NE at I-5 Southbound Ramps						
2018 Existing Conditions	C	18	0.50	F	>120	1.15
2034 Background Conditions	F	>120	1.39	F	>120	>1.50
2034 Background Plus UGB Expansion	F	>120	>1.50	F	>120	>1.50
Ehlen Road NE at I-5 Northbound Ramps						
2018 Existing Conditions	F	>120	>1.0	F	>120	1.31
2034 Background Conditions	F	>120	>1.50	F	>120	>1.50
2034 Background Plus UGB Expansion	F	>120	>1.50	F	>120	>1.50

The intersections of Donald Road/Main Street NE at Huckleberry Lane NE and Butteville Road NE at Donald Road/Main Street NE are both projected to operate acceptably through the year 2034, with or without the addition of site trips related to the UGB expansion. No mitigation is recommended on any other local roadways under the jurisdiction of the City of Donald.

The intersection of Ehlen Road NE at Butteville Road NE is projected to operate in excess of County LOS standards, but meet County v/c standards, during the evening peak hour of the 2034 planning horizon year, without the addition of site trips. Utilizing the assumed 2.4 percent per year compounded growth rate it was determined that the intersection will operate at LOS F by year 2033 without the addition of potential site trips. In other words, it is not until nearly the end of the planning horizon that this intersection is projected to operate in excess of County standards. With the addition of site trips, the intersection is projected to fail to meet County standards during both peak hours.

Input from County staff indicated that the intersection of Ehlen Road NE at Butteville Road NE is under consideration for construction of a roundabout. While the Marion County Rural TSP indicates that this

intersection was a candidate for signalization,[7] County staff has indicated that a roundabout is preferred due to safety concerns of placing a signalized intersection on a high-speed roadway with high volumes of truck traffic. Analyses were completed with a signal and with a single-lane roundabout at this intersection for 2034 background plus UGB expansion conditions. Results are shown in Table 4. With either a signal or a roundabout, the intersection is projected to operate acceptably through the planning horizon, with or without the addition of site trips related to the UGB expansion.

The intersections of Ehlen Road NE at Bents Court NE and Ehlen Road NE at Bents Road NE both currently meet county standards. With the realignment of Bents Road NE to align with Bents Court NE and signalization of the intersection, operation is projected to improve over existing conditions.

The intersections of Ehlen Road NE at the I-5 ramps currently do not meet County or State operational standards. ODOT's IAMP for the interchange is currently under development and will address both immediate and long-term improvements to the interchange.[8] Consideration of improvements to the interchange is beyond the scope of this study; however, it is assumed that with implementation of the IAMP and subsequent reconstruction of the Aurora-Donald interchange, sufficient capacity to serve future projected traffic volumes will be provided.

Railroad Crossing

A railroad divides the City of Donald, with a single rail crossing on Main Street NE immediately west of the intersection with Matthieu Street NE intersection. The current crossing offers a high level of crossing protection with flashers and gates that are activated in advance of a crossing. The proposed UGB expansion is located east of the railroad tracks and the existing crossing is sufficient to accommodate the expansion area without any upgrade of the crossing treatment.

The *Intersection Capacity & Level of Service* section above does not indicate the need for an additional railroad crossing, strictly from a capacity standpoint. Based on conversations with ODOT Rail, it would very difficult to obtain approval for an additional at-grade crossing. Both ODOT Rail and the railroad company itself are very resistant to new at-grade crossings. There is a private crossing approximately 0.4 miles south of the city limits, which is also south of the proposed UGB expansion area. This crossing would not serve the expansion area and it is also a private crossing. Upgrading a private crossing to a public crossing would effectively be akin to establishing a new public crossing.

Most new crossings are required to be grade separated, with the street going either over or under the railroad. A new crossing in Donald would require grade separation and would be prohibitively expensive. For these reasons, a new rail crossing is not proposed as part of the UGB expansion process.

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[7] Marion County, *Marion County Rural Transportation System Plan 2005 Update*, Chapter 8: Roadway System Needs and Recommended Improvements, 2005. http://www.co.marion.or.us/PW/Engineering/rtsp/Documents/chapter8roadwaysystemimprovements.pdf.

[8] ODOT, *I-5 at Aurora-Donald Interchange Project, Phase 1*, 2018. http://www.oregon.gov/odot/projects/pages/project-details.aspx?project=19062.

Safety Analysis

Left-Turn Lane and Traffic Signal Warrants

Left-turn lane warrants were evaluated for the westbound approach of the intersection of Donald Road/Main Street NE at Huckleberry Lane NE. A left-turn refuge is primarily a safety consideration for the major street, removing left-turning vehicles from the through traffic stream. The warrants used were developed from the National Cooperative Highway Research Project's (NCHRP) Report 457. These warrants are evaluated based on the number of left-turning vehicles, the number of advancing and opposing vehicles, the number of lanes, and the roadway travel speed.

Left-turn lane warrants were not met under any of the analysis scenarios for the intersection of Donald Road/Main Street NE at Huckleberry Lane NE.

Traffic signal warrants were evaluated for the following study intersections: Butteville Road NE at Donald Road/Main Street NE, Ehlen Road NE at Butteville Road NE, and the future intersection of Ehlen Road NE at Bents Road/Bents Court NE. Signal warrant analysis was conducted 70 percent of standard traffic signal warrants due to the location of the intersections in a community with a population less than 10,000, and with right-turn volumes on the minor-street approach reduced by 25 percent.

Traffic signal warrants were not projected to be met for the intersection of Butteville Road NE at Donald Road/Main Street NE in any of the analysis scenarios.

For the intersection of Ehlen Road NE at Butteville Road NE, traffic signal warrants were not met for 2034 background conditions, but were met under 2034 background plus UGB expansion conditions. As stated previously, however, County officials are also considering a roundabout for this intersection for safety reasons.

Traffic signal warrants were also evaluated for the intersection of Ehlen Road NE at Bents Court NE, assuming the realignment of Bents Road NE to comprise a northern leg of this intersection has already occurred. Preliminary signal warrants were met for 2034 background conditions, due to interruption of continuous traffic. As mentioned previously, a signal is under consideration for this intersection, along with the realignment of Bents Road NE.

Transportation Planning Rule

The Oregon Administrative Rules (OAR) contain regulations for UGB expansions. In addition, Oregon's Transportation Planning Rule (TPR) is also contained in the OARs. The TPR is in place to ensure that when an adopted plan or land use regulation is amended, provisions are made to ensure that the transportation system can support any potential increase in trip intensity resulting from the amendment. Division 24 of Chapter 660 of the OAR addresses the adoption or an amendment to a UGB:

660-024-0020 Adoption or Amendment of a UGB

1. *All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:*

    d. The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary;

Consistent with the section above, detailed TPR findings are being deferred to the time of annexation. The interim Urban Transition Marion County zoning proposed for the UGB expansion area is generally consistent with the current rural zoning. As such, there will be no increase in development potential or trip generation from the expansion area until the time of annexation.

Still, the analysis contained in this Transportation Impact Study provides an analysis of conditions at the planning horizon and evaluates the impacts associated with the proposed UGB expansion. As such, the analysis and findings of this report provide sufficient evidence to satisfy the requirements of Chapter 660 of the OAR by identifying necessary transportation facilities.

At the time of annexation, specific analysis and findings will be required to comply with OAR 660-012-0060, using this analysis and report as a guiding document.

Conclusions

A proposed UGB expansion in the City of Donald is projected to add up to 427 peak hour trips to the surrounding transportation system, but will not degrade the performance of any of the study intersections beyond their 2034 planning horizon background operations.

With planned improvements to the intersections of Ehlen Road NE at Butteville Road NE, Ehlen Road at Bents Court NE, and Ehlen Road at Bents Road NE, the study intersections are projected to operate acceptably through year 2034, regardless of trips resulting from the proposed UGB expansion and any subsequent residential development.

While the intersections comprising the I-5 Aurora-Donald Interchange currently fail to meet operational standards, improvements are planned in ODOT's IAMP, and are likely to be completed within the planning horizon. Interchange improvements are beyond the scope of this report.

Neither left-turn lane warrants nor signal warrants are projected to be met for the intersection of Donald Road/Main Street NE at Huckleberry Lane NE.

Preliminary traffic signal warrants were projected to be met for the intersections of Ehlen Road NE at Butteville Road NE, and Ehlen Road NE at Bents Court NE, after realignment of Bents Road NE, for the 2034 background conditions. Marion County has indicated a roundabout is also under consideration for the intersection of Ehlen Road NE at Butteville Road NE. After construction of a roundabout or signal at this intersection, and realignment of Bents Road NE and signalization of the new intersection of Ehlen Road NE at Bents Court/Bents Road NE, both intersections are projected to operate acceptably through year 2034, with or without the addition of trips related to the proposed UGB expansion.

Appendix