ORDINANCE NO. 171-2018

AN ORDINANCE OF THE CITY OF DONALD AMENDING THE TEXT AND MAP OF THE CITY OF DONALD COMPREHENSIVE PLAN TO EXPAND THE CITY OF DONALD'S URBAN GROWTH BOUNDARY BY 87.6 ACRES AND AMENDING MUNICIPAL CODE SECTION 150.01

WHEREAS the Oregon Revised Statutes (ORS) 197.296 and the Oregon Administrative Rules (OAR) 660-015-0000(14) require Oregon cities to maintain a 20-year land supply for housing and employment needs; and

WHEREAS on August 11, 2015 the Council passed Ordinance No. 161-2015 an ordinance amending the Donald Comprehensive Plan to adopt the 2015 Buildable Land Inventory, Housing Needs Assessment, and Economic Opportunities Analysis and Adopt the 20-Year Population Projection Coordinated with Marion County, which revealed a 76.7 acre residential land deficit in the City's 20-year land supply; and

WHEREAS on April 11, 2017, the Council authorized staff by a 5-0-0 vote to undertake an Urban Growth Boundary Study to address the adopted residential land deficit; and

WHEREAS staff prepared and submitted a staff report to the Donald Planning Commission on April 19, 2018 which is incorporated herein by this reference; and

WHEREAS, on April 26, 2018 the Donald Planning Commission conducted a duly noticed public hearing regarding Planning File Legislative Amendment LA-2017-01, an application by the City of Donald regarding an amendment to the text and Land Use Designation map of the Donald Comprehensive Plan to expand the Urban Growth Boundary by 87.6 acres, to consist of 76.7 acres residential land and 10.9 acres of public facility. At the hearing the public was given a full opportunity to be present and heard on the matter, and the Donald City Planning Commission considered the information provided by City staff and the public. After deliberation, the Donald Planning Commission voted to recommend approval with 5 votes in favor and 1 abstention; and

WHEREAS, on May 8, 2018 the Donald City Council conducted a duly noticed public hearing regarding Planning File Legislative Amendment LA-2017-01, an application by City of Donald regarding an amendment to the text and Land Use Designation Map of Donald Comprehensive Plan to expand the Urban Growth Boundary by 87.6 acres, consisting of 76.7 acres of residential land and 10.9 acres of public facility, at which time the public was given a full opportunity to be present and heard on the matter. At that meeting the Donald City Council considered the information provided by City staff, the public, and the Planning Commission's May 8, 2018 recommendation to approve the Donald Comprehensive Plan text and map amendment; and

WHEREAS following a second reading of Ordinance No 171-2018 on June 12, 2018

NOW THEREFORE, THE CITY OF DONALD ORDAINS AS FOLLOWS:

Section 1. The City Council of the City of Donald does hereby adopt the staff report to the City Council dated May 2, 2018.

Section 2. The City Council of the City of Donald does hereby adopt those certain findings of fact, conclusionary findings, and supporting documentation as amended and included as Exhibit A attached hereto and by this reference made a part hereof.

Section 3. The City Council of the City of Donald does hereby amend the Comprehensive Plan Land Use Designation Map's Urban Growth Boundary to include the property line shown in Exhibit A, Figure 1, also included as Attachment A1, and as listed in Table 1.

Section 4. The City Council of the City of Donald does hereby amend the Comprehensive Plan Map to place the Residential land use designation on 76.7 acres of property, and to place the Public designation on 10.9 acres of property, as shown in Exhibit A, Figure 4, also included as Attachment A4.

Section 6. The City Council of the City of Donald does hereby amend the Comprehensive Plan text to include revisions in the Land Use Element and Urbanization Element documenting the UGB expansion, as listed in Exhibit A, Attachments B1 and B2.

Section 7. The City Council does hereby request interim Marion County Zoning designations of UT-Urban Transition to be placed on 76.7 acres of residential and P-Public to be placed on 10.9 acres, as shown in Exhibit A, Figure 2 also included as Attachment A2.

Section 8. The City Council does hereby intend to place the future land use zoning designation of R7- Single Family Residential Zone on 69.11 acres, RM – Multi-Family Residential Zone on 7.59 acres, and P-Public Zone on 10.9 acres, once these properties are annexed into the City Limits, as shown in Exhibit A, Figure 2 also included as Attachment A2.

Section 9. The first reading of this Ordinance was conducted on May 8, 2018. The second reading of this Ordinance was conducted on June 12, 2018 and was passed and adopted by the City Council on June 12, 2018 as follows:

5 AYES
0 NAYS
0 ABSTENTIONS

Section 10: This Ordinance shall be effective on the thirtieth day after the date of enactment below, as per City Charter Chapter VIII, Section 36.

SIGNED and **DATED** this 12th day of July, 2018

Rick Olmsted, Mayor

ATTEST

Heidi Bell, City Manager

PASSED by the City Council: June 12, 2018
SIGNED by the Mayor: July 12, 2018
EFFECTIVE: July 12, 2018

STAFF REPORT TO THE DONALD CITY COUNCIL

DONALD URBAN GROWTH BOUNDARY EXPANSION

REPORT DATE: May 2, 2018

PUBLIC HEARING: May 8, 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 3.112 Text 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: Adoption of the findings and approval of the Comprehensive Plan Map and Text 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 by City Ordinance No. 161-2015. 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 on April 11, 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 Comprehensive Plan Map and Text 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." The City of Donald Planning Commission held a public hearing and took public testimony regarding this file on April 26, 2018. The Planning Commission voted to recommend adoption of the staff report findings and approval of the proposed Comprehensive Plan amendment by the Donald City Council following a public hearing scheduled for May 8, 2018.

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).

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.

FILE TIMELINE

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 Urban Growth elements with Ordinance No. 161-2015, effective September 10, 2015. The Donald City Council voted unanimously to initiate a UGB Expansion Study on April 11, 2017. The City secured a Marion County Community Project grant to fund the UGB Expansion Study, and contracted with the Mid-Willamette Valley Council of Governments (MWVCOG) to perform the work. The Post-Acknowledgement Plan Amendment (PAPA) was submitted to DLCD in May of 2017 in order to initiate the study process securely under the adopted BLI, HNA, and certified coordinated population forecast. 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 BLI and HNA adopted in 2015, there is insufficient land within Donald's current UGB to meet the 20-year forecasted population growth of the city. The City of Donald is addressing the identified residential land deficit 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.

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 Figure 1 below, included also as Attachment A1, and detailed in 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

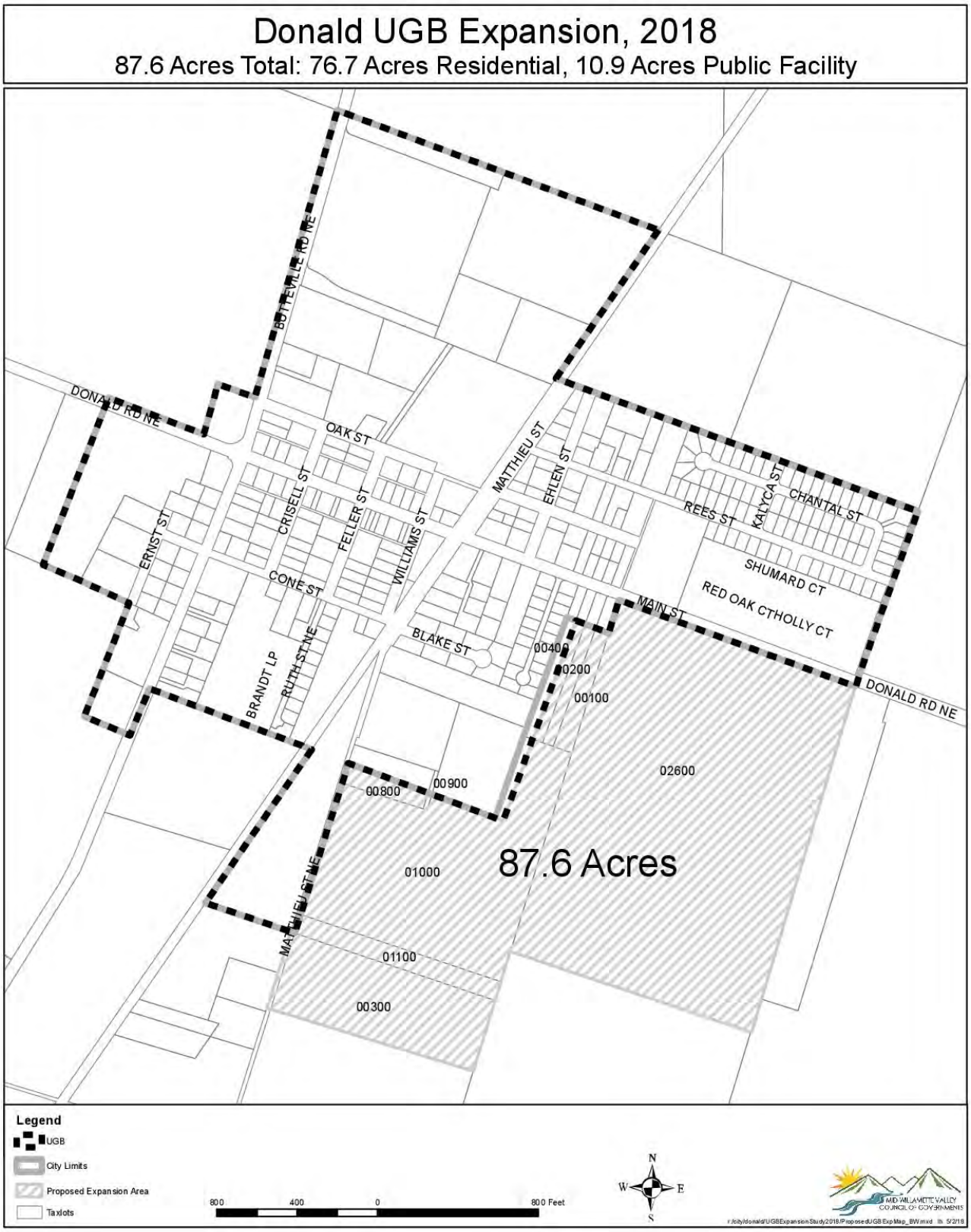
Comprehensive Plan, and zoned Exclusive Farm Use (EFU). Residentially-zoned land within the incorporated City of Donald is located to the north and west of the expansion area. These neighborhoods are zoned primarily R7-Single Family Residential, with some limited of MF- Multiple Family Residential to the north. There is also some industrially-zoned property to the west. A majority of the property acreage included in this proposal is 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	28.14	9.32	Vacant, Agricultural
Matthieu Street Public ROW	Street	Street	0.18	Unimproved County Street Right of Way
TOTAL			87.6	

Figure 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 3.112 Text 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

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 and the Planning Commission find 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 and the Planning Commission find 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 population 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 required 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 and the Planning Commission find these criteria are 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 this public facility was not included in the UGB expansion area, the approximately 10.9 acres would become an unincorporated island surrounded on all sides by the Donald UGB, and eventually incorporated city limits. 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 a 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 Land Use Map designation, propose interim Marion County Zone designations, and recommend a future City Zoning designation, which would be effective upon future annexation into the city limits, for all properties within the expansion area.

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 proposed with this amendment, 76.7 acres are proposed to receive City of Donald Comprehensive Plan designation of "Residential," interim Marion County zoning designation of UT - Urban Transition, and future City of Donald Zone designation of 7.59 acres "RM – 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.

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 Donald Comprehensive Plan designation of "Public," interim Marion County zoning of "Public," and future 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. Staff and the Planning Commission find that this criterion is met.

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

Acres	Current Marion County Zone	Proposed Marion County Zone	Proposed 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

Figure 2: Recommended future City zone designations of the expansion area (included also as Attachment A2).

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 and the Planning Commission find that this criterion 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.

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

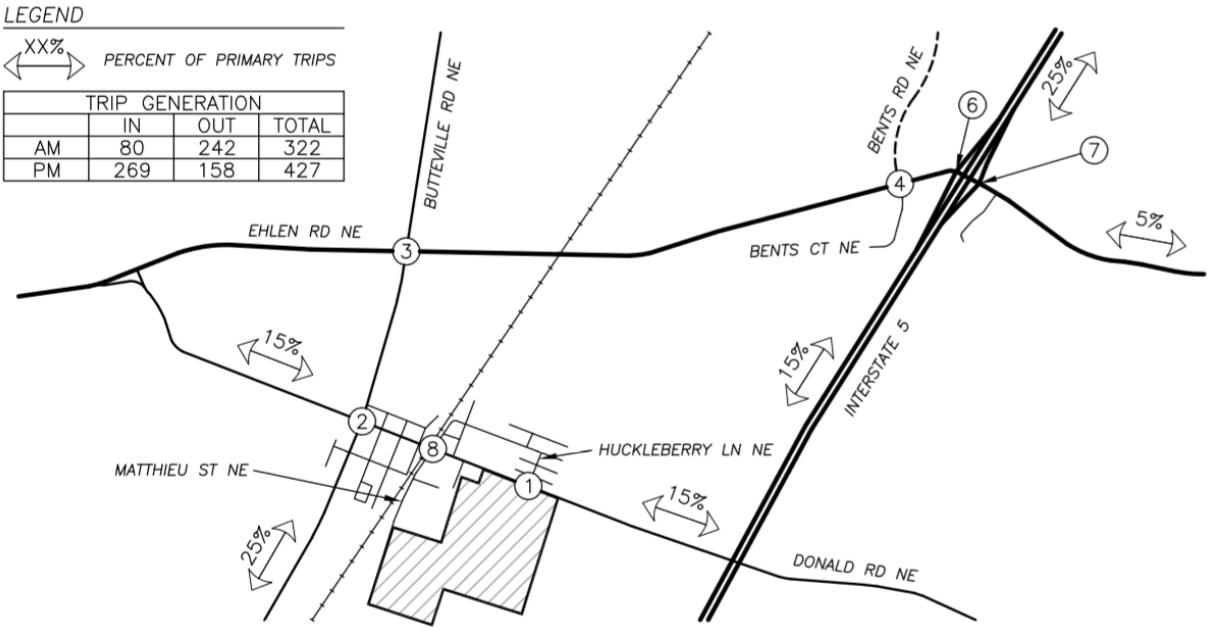
wastewater. “In an overview, the entire area of the City limits has a well-developed network of public infrastructure capable of supporting additional development.”

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 system in a private well located on one of the subject properties, tax lot #2600. 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 wastewater system capacity: “Although the collection system has sufficient surplus capacity for any UGB expansion alternatives, the lagoon treatment and irrigation facilities are currently near 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 water and sewer pipe capacity that can support growth. The proposed expansion area also includes access to the nearby storm water detention basin 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.

Regarding transportation facilities, the City of Donald contracted Lancaster Engineering to perform a Transportation Impact Study (TIS) on the proposed UGB expansion. The TIS report is included in this document as Attachment E. The purpose of the TIS 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 TIS 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 TIS 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 Main St./Donald Rd. NE at Huckleberry Lane, Butteville Rd. NE at Main St./Donald Rd. NE, and Main St. at Matthieu St. NE are all projected to operate acceptably through the year 2034, with or without the UGB development. No mitigations are proposed at these intersections which are within City of Donald jurisdiction.

- 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 (TSP) 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. The existing crossing is sufficient to accommodate the expansion area without any upgrade of the crossing treatment.

The proposed intersection improvements within Marion County and ODOT jurisdictions 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. The Donald UGB TIS did not identify any future intersection failures that were previously unknown. 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 residential lands) will be an ongoing discussion.

As the interim County zoning designation of UT proposed for the residential expansion area is consistent with the current agricultural land use, it would not cause an increase in development or traffic. Therefore, 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 and the Planning Commission find these criteria are met.

3.112 TEXT AMENDMENTS

3.112.01 Process
Amendments to the Comprehensive Plan and Development Ordinance texts shall be reviewed in accordance with the Type IV review procedures specified in Section 3.201.

FINDINGS: This amendment is being reviewed in accordance with the Type IV procedures. Staff finds that this criterion is met.

3.112.03 Criteria for Approval

Amendments to the Comprehensive Plan or Development Ordinance text shall be approved if the evidence can substantiate the following:
A. Impact of the proposed amendment on land use and development patterns within the city, as measured by:

1. *Traffic generation and circulation patterns;*
2. *Demand for public facilities and services;*
3. *Level of park and recreation facilities;*
4. *Economic activities;*
5. *Protection and use of natural resources;*
6. *Compliance of the proposal with existing adopted special purpose plans or programs, such as public facilities improvements.*

FINDINGS: The proposed amendment to the City of Donald Comprehensive Plan Text are simply the following the following two paragraphs in the indicated sections and pages of the plan. The proposed text has no impact on the above listed items above and beyond documenting that the UGB expansion has occurred in the year 2018, in order to keep the Comprehensive Plan updated in the pertinent sections. Impacts to the above list are explored elsewhere in this report in relation to the UGB expansion action. Staff finds that these criteria are met.

As also included in Attachment B1, the following text is proposed to be added to the Donald Comprehensive Plan Land Use Element, page 39:

"Urban Growth Boundary Expansion to Address Projected Residential Land Needs

In order to address the projected housing and residential land needs determined by the Buildable Lands Inventory and Housing Needs Analysis detailed above, the City of Donald conducted an Urban Growth Boundary Expansion Study and Alternatives Analysis pursuant to Oregon Administrative Rules (OAR) 660-024-0065 through 660-024-0067. With adoption of City Ordinance No. 171-2018, the Donald City Council approved an 87.6 acre Urban Growth Boundary Expansion which included 76.7 acres of residential land and 10.9 acres of public facility land. The 76.7 acres of residential land were assigned Comprehensive Plan Map Land Use Designation of Residential. The 76.7 acres of residential land were assigned an interim zoning designation with Marion County of UT-Urban Transition, in order to maintain current agricultural practices until properties are annexed into the city limits. The 76.7 acres of residential land were also assigned the future City of Donald zoning designations of 7.59 acres of RM-Multiple Family Residential and 69.11 acres of R7-Single Family Residential Zone, effective upon annexation into the city. The 2018 Urban Growth Boundary expansion satisfied the full residential land need to accommodate the projected housing need through 2034, as demonstrated in the 2015 analyses."

As also included in Attachment B2, the following text is proposed to be added to the Donald Comprehensive Plan Urban Growth Element, page 83:

"Urban Growth Boundary Expansion to Satisfy Projected Housing Need

In order to address the projected housing and residential land needs identified in Urban Growth Program Policy #7 above, the Donald City Council adopted City Ordinance No. 171-2018, approving an 87.6 acre Urban Growth Boundary Expansion which included 76.7 acres of residential land and 10.9 acres of public facility land. This 2018 Urban Growth Boundary expansion satisfied the full residential land need to accommodate Donald's projected housing need through the year 2034."

B. A demonstrated need exists for the product of the proposed amendment.

FINDINGS: The two proposed text amendments shown above are needed to update the City of Donald Comprehensive Plan in order to document the UGB expansion.

C. The proposed amendment complies with all applicable Statewide Planning Goals and administrative rule requirements.

FINDINGS: The compliance of the UGB expansion proposed action with various criteria is discussed elsewhere in this report.

D. The amendment is appropriate as measured by at least one of the following criteria:

1. It corrects identified error(s) in the provisions of the plan.

2. It represents a logical implementation of the plan.

3. It is mandated by changes in federal, state, or local law.

4. It is otherwise deemed by the council to be desirable, appropriate, and proper.

FINDINGS: Staff finds the text amendments are appropriate as they (2) represent a logical implementation of the plan in documenting the completion an action which was recommended in two different elements of the Comprehensive Plan. Staff finds this criterion 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, 2018.

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 (20) days prior to the scheduled City Council public hearing. The Planning Commission was prepared to allow a continuation of the public hearing if any parties requested additional time, in order to mitigate the deficient notice period prior to the April 26th date. Public notice was also posted at City Hall at least 10 days prior to both public hearings. A courtesy notice of public hearings was mailed to the property owners of all propertes 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 the first week of April. The public hearing date and time were also available on the City of Donald website. Staff and the Planning Commission find that these criteria are met.

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. Staff and the Planning Commission find that this criterion is met.

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 Donald's 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. Staff and the Planning Commission find that this criterion is met.

C. LCDC Goals;

FINDINGS: This criterion is addressed later in the report under the Statewide Planning Goals. Staff and the Planning Commission find that this criterion is met.

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. This UGB expansion assumes full in-fill of available land within city limits will occur. Staff and the Planning Commission find that this criterion is met.

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. Staff and the Planning Commission find that these criteria are met.

C. CITY OF DONALD COMPREHENSIVE PLAN

Urban Growth/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. Staff and the Planning Commission find that this policy does not apply.

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. Staff and the Planning Commission find that this criterion is met.

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. Staff and the Planning Commission find that this criterion is met.

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

FINDINGS: An interim Marion County zoning designation of UT- Urban Transition is proposed to be applied to the UGB expansion area, which is generally consistent with the existing conditions, enabling the continuation of agricultural practices and discouraging development from occurring outside of city limits, until annexation occurs. This proposed action is not anticipated to impact rural agricultural areas outside the proposed UGB expansion area. Staff and the Planning Commission find that this criterion is met.

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, wastewater, and storm water facilities. The City received Infrastructure Finance Authority (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, with triggers at various thresholds, to ensure that key urban facilities continue to serve the community. Staff and the Planning Commission find that this criterion is met.

6. The city shall review methods to increase residential development densities allowed in the R7 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 new 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. The TGM Code Revision Package is a separate and ongoing project. Staff and the Planning Commission find that this criterion is met.

> *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 in order to provide the needed 76.7 acres of residential land, as determined by the adopted HNA. Staff and the Planning Commission find that this criterion is met.

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. Staff and the Planning Commission find that this criterion is met.

> *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 2015 BLI indicated that there is a sufficient supply of employment land, of both commercial and industrial zoning. This amendment addresses only residential land needed for housing, and an adjacent public facility as well. This need was demonstrated in the adopted HNA. Staff and the Planning Commission find that these criteria are met.

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

FINDINGS: As previously addressed, the subject properties are contiguous to the city limits. Services can be extended to each of the parcels, with beneficial opportunities to loop infrastructure through the expansion area. Donald's revised water and wastewater master plans should be completed in August of 2018. No transportation improvements are required within the City of Donald jurisdiction as a result of this amendment. Necessary transportation system improvements have been identified within the 2034 planning horizon in both Marion County and ODOT jurisdiction, with or without this amendment. The City will continue to coordinate closely with those agencies on regional transportation projects. Staff and the Planning Commission find that this criterion is met.

d. Efficient accommodation of identified land needs;

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

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 water, sewer, 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. Staff and the Planning Commission find that these criteria are met.

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. There was determined to be an insufficient amount of other land, as none was identified. 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. While

Alternative C provides several benefits, it was determined to be the preferred alternative first and foremost because it contains the lowest capability lands. Staff and the Planning Commission find that this criterion is met.

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. Staff and the Planning Commission find that this criterion is met.

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 were noticed, open to the public, and provided an opportunity for public input in all phases of the planning process.

The City of Donald UGB 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 was at least 35 days prior to the date of the first public 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 an online 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 public facility. 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 wetland resources. A map of the Marion County hydrography is provided as Attachment C7. Staff and the Planning Commission find that these criteria are 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: As previously addressed, when developed, the residential uses will be required to connect to city public water, sewer, and storm water systems, thereby minimizing impact on air, water, and land resource quality. Staff and the Planning Commission find that these criteria are 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 and the Planning Commission find that this criterion 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. Public park facilities can be included within those amenities and facilities. The Planned Unit Development (PUD) code currently in draft form in the simultaneous TGM code revision package includes provisions for open space requirements. It is therefore reasonable to expect new public open space and/or park facilities to result from the future development of the UGB expansion area. There is no existing recreational land within the vicinity of the subject properties that could be adversely impacted by this action. Staff and the Planning Commission find that this criterion 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, and therefore 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. Future housing development will provide short term 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 and the Planning Commission find the proposed residential land expansion can be found to support and not be detrimental to Goal 9 Economic Development.

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 and the Planning Commission find that this criterion 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, which will be addressed in the City's revised water and wastewater master plans, anticipated in August of 2018. These lands may therefore be serviced in an orderly and efficient manner consistent with existing public service lines and facilities. Staff and the Planning Commission find that this criterion 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 Study (TIS) for the proposed expansion area with the planning horizon of 2034. A TIS summary is included earlier in this report. The full report is included as Attachment E.

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. Staff and the Planning Commission find that this criterion is met.

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 and the Planning Commission find that this criterion 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 and the Planning Commission find that these criterion are 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. Staff and the Planning Commission find that Statewide Goals 15 through 19 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 a 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. Staff and the Planning Commission find that this criterion is met.

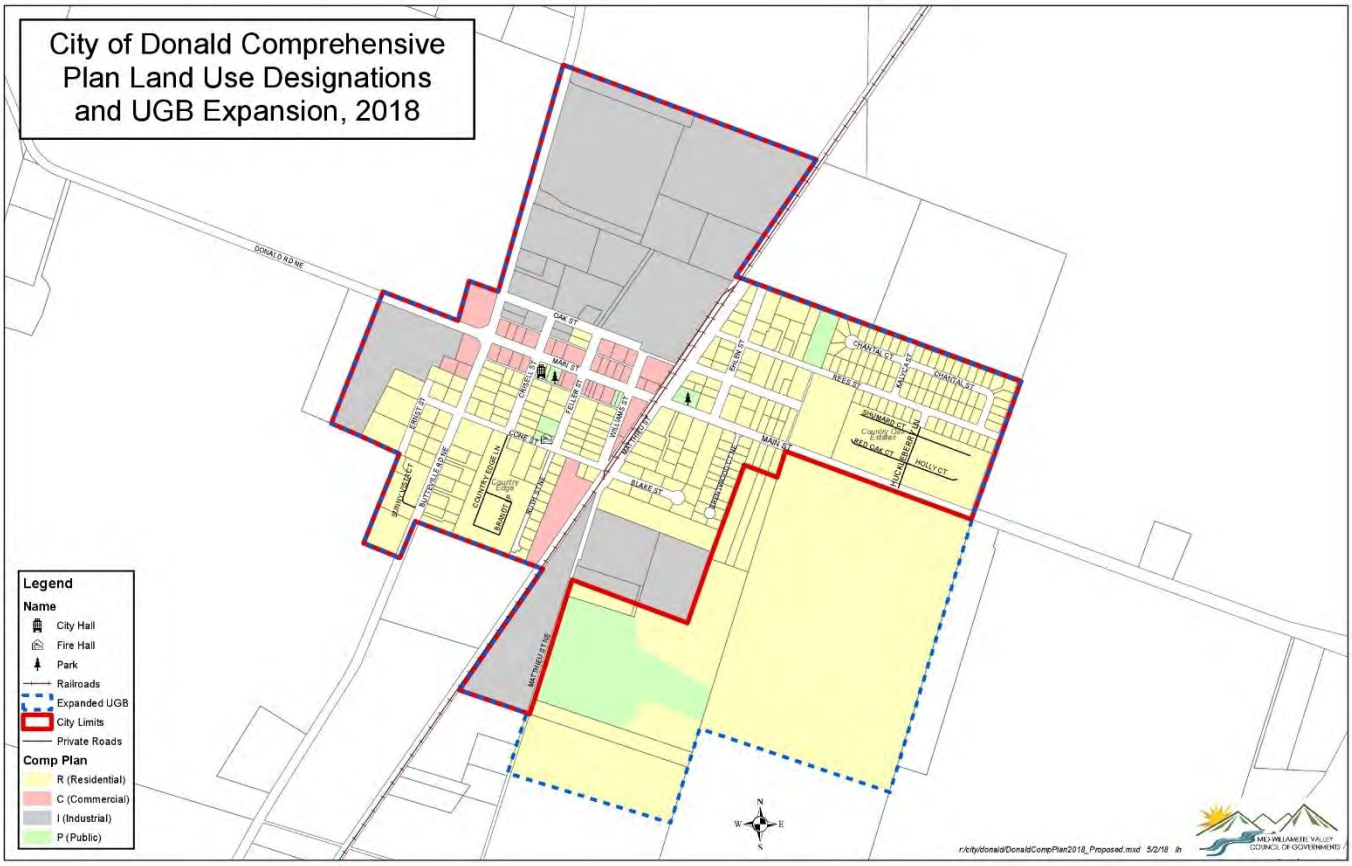
660-024-0020
Adoption or Amendment of a UGB
(1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:
(a) The exceptions process in Goal 2 and OAR chapter 660, division 4, is not applicable unless a local government chooses to take 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. Staff and the Planning Commission find that these criteria are met.

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: A map of the UGB amendment on the City of Donald Comprehensive Plan Land Use Designation Map is provided below as Figure 4, and is also included as Attachment A4. Staff and the Planning Commission find that this criterion is met.

Figure 4: City of Donald Comprehensive Plan Land Use Designation Map showing 2018 UGB Expansion



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. This population projection was adopted by Marion County and 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 the Population Research Center (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. Staff and the Planning Commission find that these criteria are met.

(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. Staff and the Planning Commission find that this criterion does not apply.

(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 addresses 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. Staff and the Planning Commission find that these criteria are met.

(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: Staff and the Planning Commission find that 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: These criteria have been previously addressed. Public facilities can be made available to serve the expansion area. A Transportation Impact Study (TIS) was performed for this proposed amendment in consideration of these applicable requirements. It is included as Attachment E. 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. Staff and the Planning Commission find that these criteria are met.

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

FINDINGS: Staff and the Planning Commission find that 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. 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 2015 BLI and HNA.

660-024-0045 Regional Large Lot Industrial Land

FINDINGS: Staff and the Planning Commission find that as the amendment includes residential and public land only, this large lot industrial land 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 2015 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. Staff and the Planning Commission find that these criterion were met by the 2015 BLI.

660-024-0060 Metro Boundary Location Alternatives Analysis

FINDINGS: As the City of Donald is not located in the Metro area, Staff and the Planning Commission find that 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 PRC certified population of Donald in December of 2016 was 985, which is less than 10,000. The City of Donald does not have an urban reserve or any exception 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 C4. Staff and the Planning Commission find that these criteria are met.

(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. Staff and the Planning Commission find that Sections (2) and (3) above do 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 proximity/distance and therefore expense to service. No land was excluded due to identification of development hazards. None were identified within the study area. Staff and the Planning Commission find that these criteria were met.

> *(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. Staff and the Planning Commission find that these criteria are met.

> *(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. Staff and the Planning Commission find that this criterion is met.

> *(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." Staff and the Planning Commission find that this criterion is met.

> *(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 TIS 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 to the railroad crossing are required.

One other consideration was a pressurized natural gas pipeline which runs north-south within the railroad corridor, also bisecting the community. Staff reached out to Kinder Morgan corporation, the pipeline owner and manager, for comments. The company's concerns pertained to any street improvements which may occur on Matthieu Street NE 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 to Matthieu St. NE sufficient to serve an expanded UGB. So the pipeline is determined not to be a barrier.

Staff and the Planning Commission find that these criteria are met.

> *(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: Staff and the Planning Commission find that neither section (8) nor (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: Staff and the Planning Commission find that 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: Staff and the Planning Commission find that 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: Staff and the Planning Commission find that 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

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.

Staff and the Planning Commission find that this criterion is met.

(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: Staff and the Planning Commission find that this section does not apply, because the Donald study area evaluation and ranking was dependent 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). Staff and the Planning Commission find that this criterion is met.

(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 each in size. These properties were considered developable by the TAC (were not deemed "unsuitable"), and so they were included in the proposal. Staff and the Planning Commission found that this criterion is met.

(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: Staff and the Planning Commission found 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:	1) Land is divided into two sections north and south of Main Street, stretching the city form in a	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**

	(7)(1) Efficient accommodation of identified land needs.	linear manner to the east		
Section 7, GOAL 14 Boundary Location Factor #2	(7)(2) Orderly and economic provision of public facilities and services.	2) City water and wastewater can serve. System upgrades necessary regardless of UGB expansion alternative. Water and wastewater master planning under way. Would not provide looped system. Transportation impacts would not vary significantly.	2) City water and wastewater can serve. System upgrades necessary regardless of UGB expansion alternative. Water and wastewater master planning under way. Would provide looped system. Potential cost savings with existing well. Access to storm water detention facility for full UGB area runoff.	**2) City water and wastewater can serve. System upgrades necessary regardless of UGB expansion alternative. Water and wastewater master planning under way. Would provide looped system. Potential cost savings will existing well. 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	8) Transportation consultants coordinated with both	8) Transportation consultants coordinated with both	**8) Transportation consultants coordinated with both Marion**

	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.	Marion County and ODOT in the production of the TIS. Alternatives would have similar impacts upon local & regional transportation facilities. Staff contacted DSL and ODFW.	Marion County and ODOT in the production of the TIS. 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 and delineated at time of development proposal. Anticipated PUD process could maintain wetlands as open space in exchange for density bonus to developer.	**County and ODOT in the production of the TIS. 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 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	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.	**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.**

	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.		Alternatives B and C are identical in this regard.	**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 C2 and C3 to this report.

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

Based on the findings in this report, staff and the Planning Commission find 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 Goals, and the pertinent sections of the Oregon Administrative Rules (OAR).

Staff and the Planning Commission recommend that the City Council ADOPT the findings in the staff report and APPROVE the Comprehensive Plan Amendment (file # LA 2017-01).

PLANNING COMMISSION OPTIONS:

A. A motion adopting the findings in the staff report and approving the Comprehensive Plan Amendment, file # LA2017-01.

   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. Urban Growth Boundary Expansion Maps

1. Figure 1: Black & white map with proposed UGB expansion, tax lots
2. Figure 2: Zone Designations: Interim Marion County & Future City of Donald
3. Figure 3: Comprehensive Plan Land Use Designation Map, current
4. Figure 4: Comprehensive Plan Land Use Designation Map, proposed

B. Comprehensive Plan Text Amendments

1. Land Use Element
2. Urban Growth Element

C. Resource Maps

1. Color aerial photo with zoning overlay and proposed UGB expansion outlined
2. Alternatives A, B, C considered for UGB expansion by TAC
3. Alternatives A, B, C over soils layer
4. UGB Preliminary Study Area ½ mile radius over tax lots
5. Soils, MWVCOG
6. Soils, Marion County
7. Hydrography, MWVCOG
8. Contours, MWVCOG
9. City Water & Sewer Facilities, Engineer Curran McLeod

D. Statement from City Engineer on City Facilities

E. Transportation Impact Study (TIS) performed by Lancaster Engineering

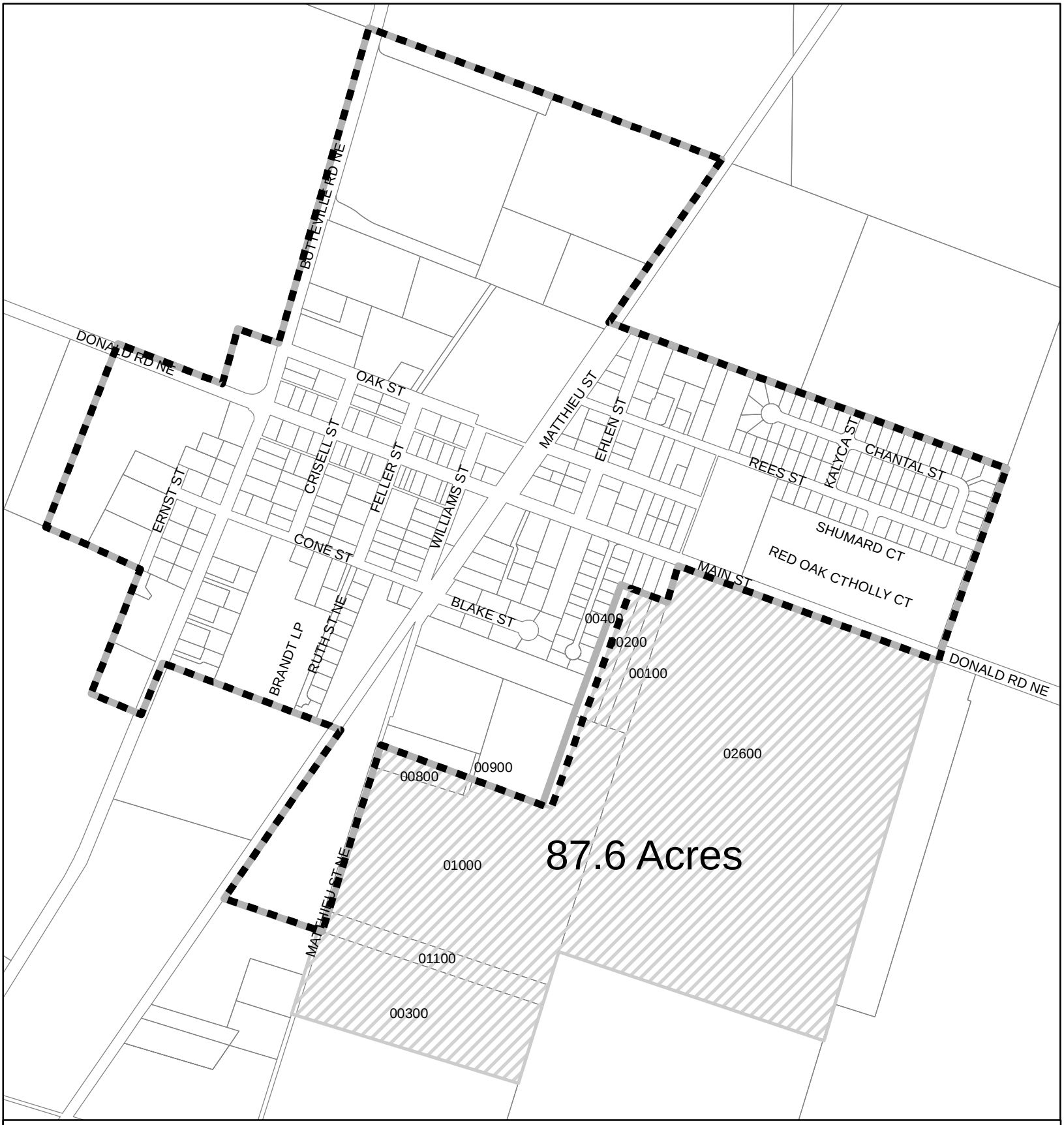
F. Statement from Oregon Department of Transportation (ODOT)

G. FAQ – Frequently Asked Questions Handout

Donald UGB Expansion, 2018

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

ATT A1



Legend

- UGB
- City Limits
- Proposed Expansion Area
- Taxlots

800 400 0 800 Feet

N W E S

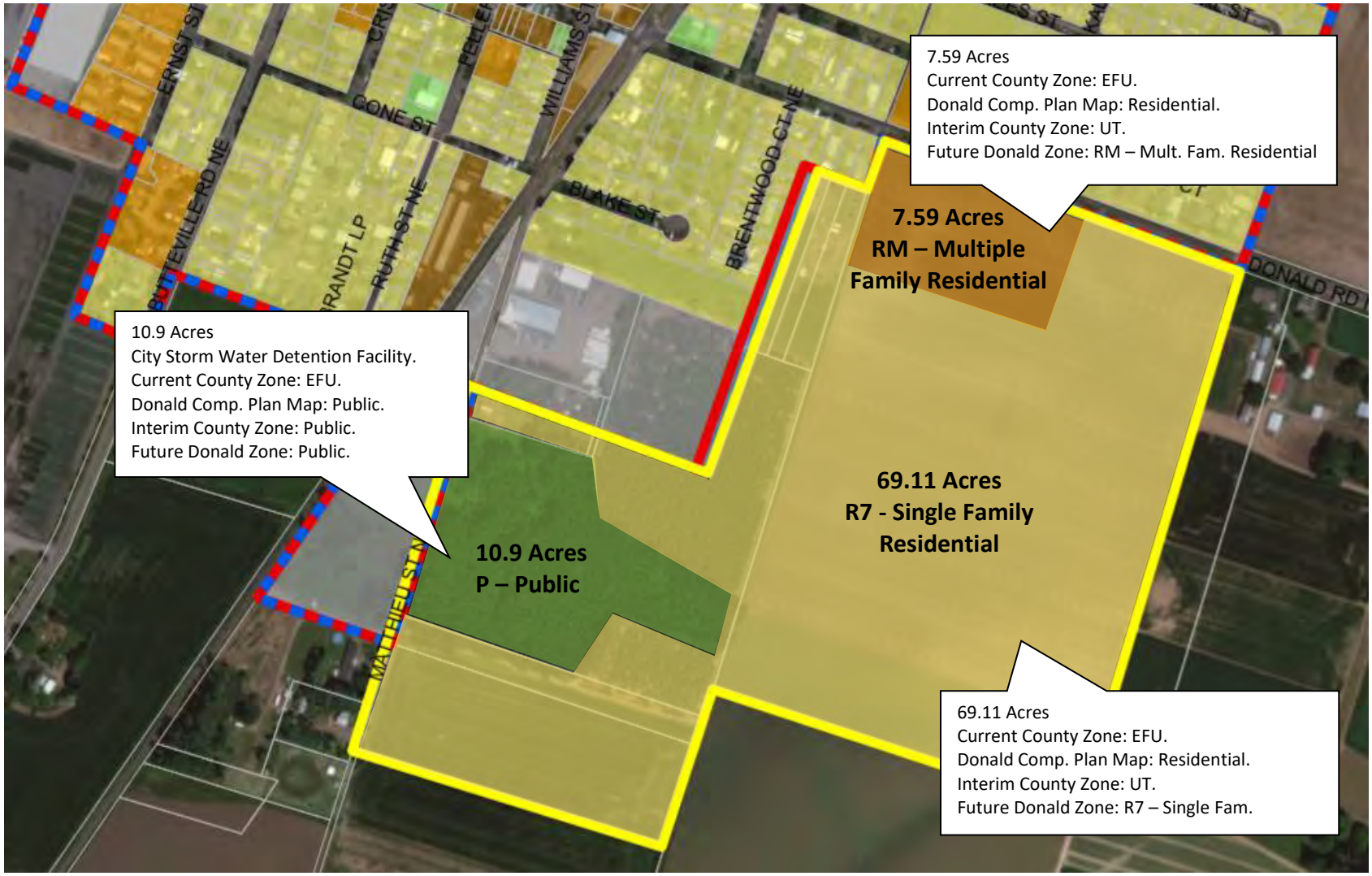
MID-WILLAMETTE VALLEY COUNCIL OF GOVERNMENTS

r:/city/donald/UGBExpansionStudy2018/ProposedUGBExpMap_BW.mxd lh 5/2/18

ATT A2

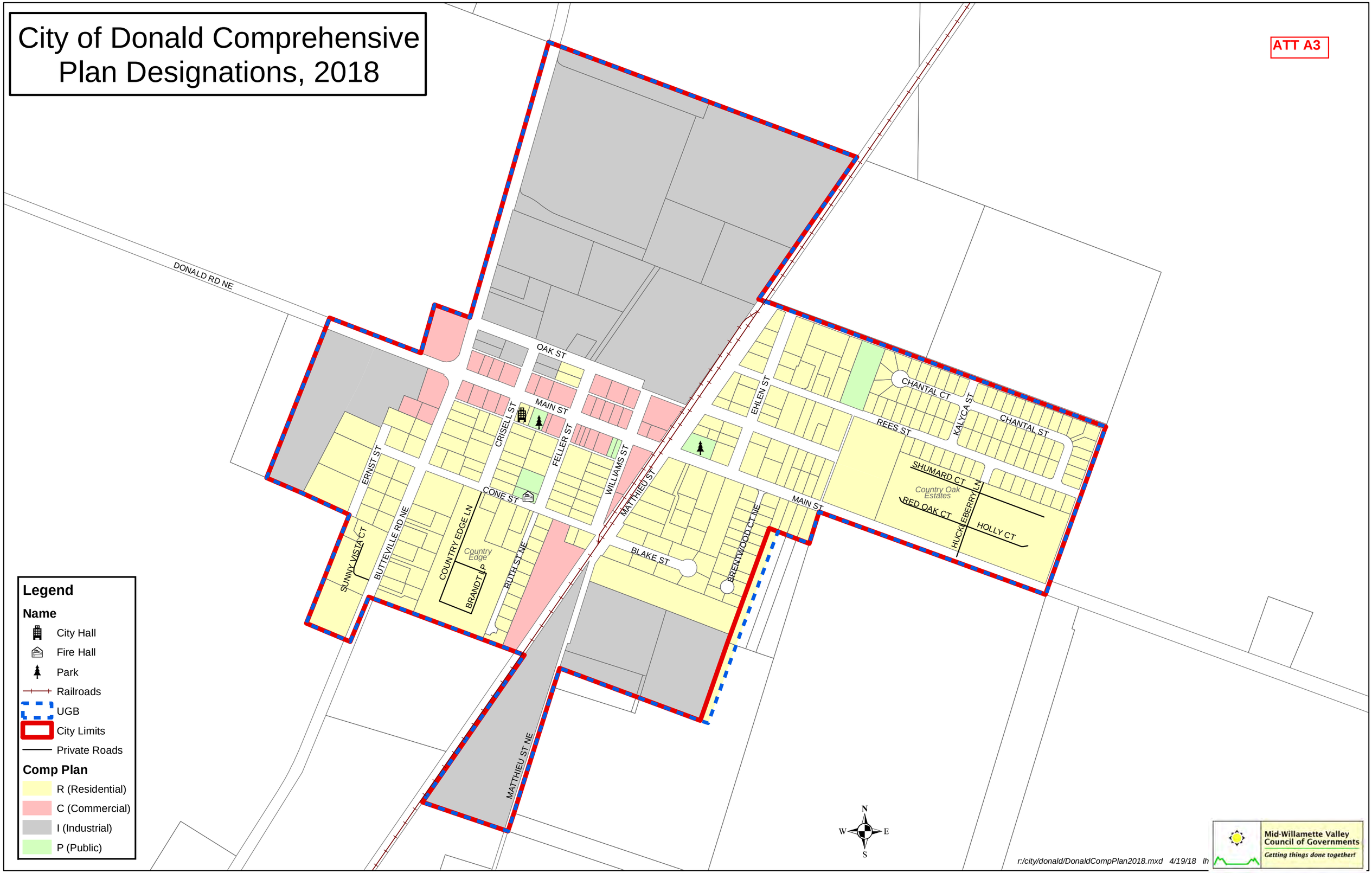
2018 DONALD UGB EXPANSION

Zone Designations: Interim Marion County & Future City of Donald



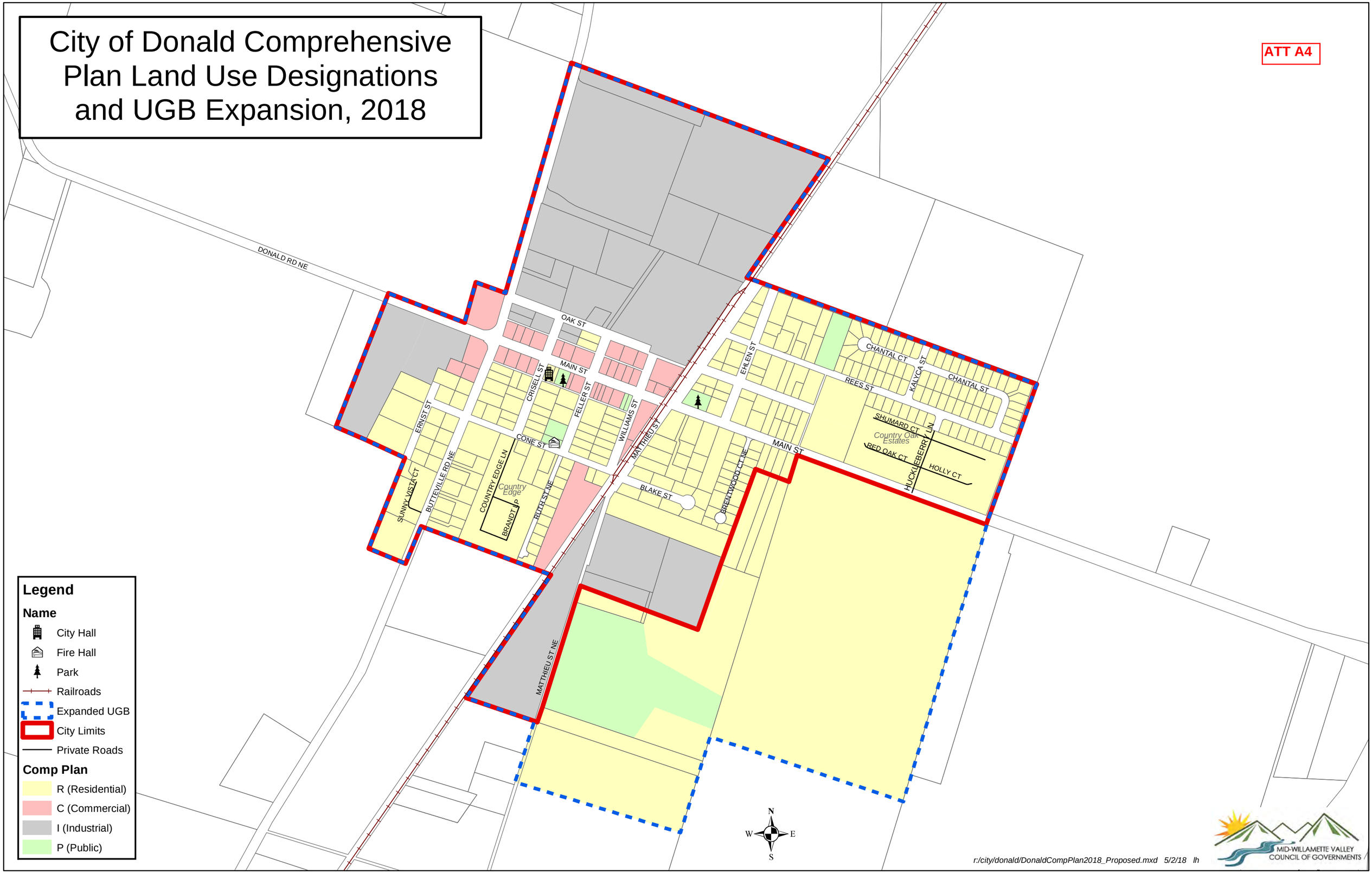
City of Donald Comprehensive Plan Designations, 2018

ATT A3



City of Donald Comprehensive Plan Land Use Designations and UGB Expansion, 2018

ATT A4



ATT B1

LAND USE

Introduction

A land use plan indicates the area into which various types of activities are expected to occur. Donald designates four categories of land uses to be described and located on the land use map.

1. Residential: Areas designated for this land use have a minimum lot size of 7,000 square feet in the R-7 zone and 3,000 in the R-M zone.

2. Commercial. Commercial uses include all activities of a commercial nature.

3. Industrial. Industrial use covers the range of manufacturing, warehousing, and wholesaling activities.

4. Public: Public use includes areas such as parks, fire stations, pump houses, sewer treatment facilities.

Existing Conditions and Buildable Lands Inventory

For each land type (residential, commercial, and industrial), the analysis was broken into two parts. First, the findings describe the amount of net buildable land, by zoning district, within the existing city limits. The findings then describe the amount of buildable land located between the city limits and UGB. Land in this area is zoned by the County until it is annexed into the city. The City's Comprehensive Plan does designate, in general, the future use (residential, commercial, or industrial) for such properties.

The analysis of lands includes totals for land determined to be vacant or redevelopable inside and outside of the city limits. All land analyzed is within the city's Urban Growth Boundary.

The following parameters are used to determine whether land is partially vacant and/or redevelopable.

- Vacant residential land includes all residentially zoned parcels that are at least 3,000 square feet (0.07 acres) in size with improvement values of less than $10,000. The minimum lot size for residential parcels in Donald is 7,000 square feet in the single-family residential (R-7) zone and 3,000 square feet/unit in the multiple-family residential (RM) zone.

- Staff evaluated lots of record smaller than 7,000 square feet on a case by case basis in order to gauge the RM development potential. The Donald Development Ordinance (DDO) permits development upon lots of record smaller than zone minimum lot sizes

as long as the use or development complies with the DDO, irrespective of the lot width, frontage, depth or area, but subject to all other regulations such as minimum setbacks (DDO 2.201.03).

- Lots of 3,000 square feet or less were not included as vacant lots as the potential to develop these lots and meet setback requirements was not deemed feasible under the current DDO (DDO 2.201.03).

- Within the city limits, partially vacant land consists of residential parcels that are at least 0.5 acre in size with an improvement value of at least $10,000. This analysis assumes that 0.25 acres, or 10,890 square feet, is devoted to the existing house, with the remainder considered vacant. The remaining amount of land is added to the amount of gross buildable land [OAR 660-024-0050(2)(a)].

- Vacant employment land includes all commercial and industrial zoned parcels that are at least 0.5 acres in size with improvement values of less than $10,000 [OAR 660-024-0050(3)(a0].

- Employment land with infill potential includes all commercial and industrial parcels that are at least 5.0 acres in size where the improvement occupies 0.5 acres or less of the parcel

- Parcels zoned residential that are currently occupied by a manufactured home are considered developed by the TAC. These parcels may fit the criteria of a vacant lot due to an assessed a small improvement value of less than $10,000, however redeveloping these parcels would result in zero gain of housing stock.

The analysis also includes an assessment of land that is not buildable due to physical constraints such as steep slopes, floodways and Flood Hazard zones, and wetlands. It has been found that the City of Donald does not have any such constraints within its UGB.

Based on these refinements, the total amount of buildable land shown in each category (residential, commercial, industrial) represents the net amount of buildable land.

Residential Land

In the City of Donald, approximately 68.47 acres are zoned residential. Approximately 56.77 acres within the Donald UGB are currently developed for residential use. **Table 3** shows the amount of buildable land for each residential zoning district within the Donald urban area (both

city limits and UGB). Approximately 9.93 net buildable acres are available for residential development within the urban area. Of that amount, approximately 9.24 acres are available within the city limits and .69 acres are available between the city limits and UGB. Within the urban area, approximately 6.05 acres designated for residential use can be considered redevelopable.

Table 3
Buildable Residential Land
City of Donald

Zone/Plan Designation	**Vacant (acres)**	**Redevelopable (acres)**	**Total (acres)**
Within the City Limits			
Residential District R7	3.07	4.88	7.95
Residential District RM	0.12	1.17	1.29
Buildable acres within City Limits	3.19	6.05	9.24
Between the City Limits and UGB			
Residential Designation	0.69	0	0.69
Buildable acres Between City Limits & UGB	0.69	0	0.69
Buildable acres within the Urban Area	**3.88**	**6.05**	**9.93**

Source: Marion County Assessor, MWVCOG 2014

Commercial Land

In the City of Donald, approximately 8.08 acres are zoned commercial. Approximately 5.50 acres within the Donald UGB are currently developed for commercial use. **Table 4** shows that approximately 2 net buildable acres are available for commercial development within the Donald city limits. (No land designated for future commercial use is located between the city limits and urban growth boundary.) Approximately 1.74 acres designated for commercial use can be considered redevelopable.

Table 4
Buildable Commercial Land
City of Donald

Zone/Plan Designation	Vacant (acres)	Redevelopable (acres)	Total (acres)
Within the City Limits			
Commercial	0.26	1.74	2
Buildable acres within City Limits	0.26	1.74	2
Between the City Limits and UGB			
Commercial Designation	0	0	0
Net Buildable acres within the Urban Area	**.26**	**1.74**	**2**

Source: Marion County Assessor, MWVCOG 2014

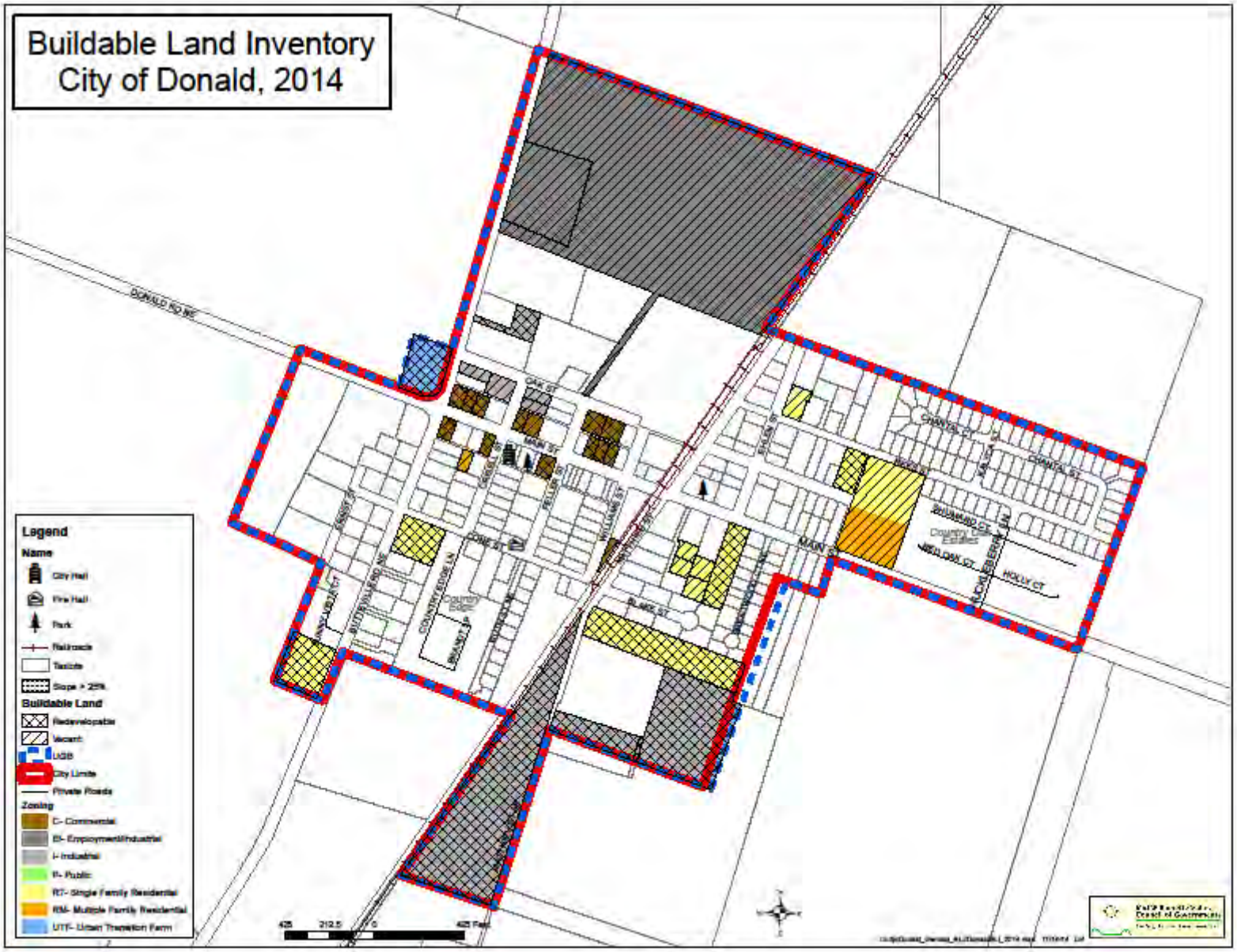
Industrial Land

In the City of Donald, approximately 72.43 acres are zoned industrial. Approximately 57.67 acres within the Donald UGB are currently developed for industrial use. **Table 5** shows the amount of buildable land for each industrial zoning district within the Donald urban area (both city limits and UGB). Approximately 13.46 net buildable acres are available for industrial development within the urban area. Approximately 12.57 acres of the available industrial zoned land is currently within the city limits, and 0.89 acres are available outside of the city limits but within the UGB. Within the urban area, approximately 12.72 acres designated for industrial use can be considered redevelopable.

Table 5
Buildable Industrial Land
City of Donald

Zone/Plan Designation	Vacant (acres)	Redevelopable (acres)	Total (acres)
Within the City Limits			
Employment Industrial (EI)	0	0	0
Industrial (I)	0.74	11.83	12.57
Buildable acres within City Limits	0.74	11.83	12.57
Between the City Limits and UGB			
Industrial Designation	0	0.89	0.89
Buildable acres within the Urban Area	**0.74**	**12.72**	**13.46**

Source: Marion County Assessor, MWVCOG 2014


Buildable Land Inventory
City of Donald, 2014
Legend
Name
City Hall
Fire Hall
Park
Railroads
Taxlots
Slope > 25%
Buildable Land
Redevelopable
Vacant
UGB
City Limits
Private Roads
Zoning
C- Commercial
EI- Employment/Industrial
I- Industrial
P- Public
R1- Single Family Residential
RM- Multiple Family Residential
UTF- Urban Transition Farm
DONALD RD NE
OAK ST
MAIN ST
CHANTAL ST
BLACK ST
HOLLY CT
425
212.5
0
425 Feet

RESIDENTIAL LAND USE

Existing Housing Conditions

The mix of residential housing units within the city limits is determined from 2010 Census data. Of the 391 total residential units, 245 units, or 62.6 percent, are single-family residential units. Approximately 7 units, or 1.8 percent, are multi-family residences and the remaining 139 units, or 35.5 percent, are manufactured homes within manufactured housing parks.

Table 6 shows the housing supply as well as the percentage of single family and multi-family housing that makes up the total housing supply. In this analysis, manufactured homes are counted as single family units, as these types of units are not typically constructed as multi-family units. Single family units make up a large majority of the housing mix in 2014.

Table 6
City of Donald Housing Supply and Mix

Population	Persons Per Household	Existing Housing Units	Existing Multi-Family Units	Existing Single Family Units	Vacant Units	Multi-Family Units (Percent)	Single Family Units (Percent)
950	2.55	391	7	384	18	1.8%	98.2%

Source: U.S. Census Bureau, 2009 – 2013 American Community Survey

Housing Needs Analysis

This section presents estimates of housing need, in acres, by housing type for the City of Donald over a 20 year planning period ending in 2034. The data is predominately based upon current Census figures. However, other sources of information include the American Community Survey (ACS) and building permit data from Marion County are also included. This analysis uses housing supply and mix, average housing density by type, as well as housing trends that may affect housing demand in the future. The analysis is intended to predict need for both single family and multi-family housing units at the of a 20-year period from 2014 to 2034.

The analysis of housing need is based on the following assumptions:

(1) This analysis is calculated using data from the 2009-2013 American Community Survey. American Community Survey data is used rather than 2010 US Census because it provides more recent statistics in terms of population, household size, and housing mix. For comparison, a summarized table of the Housing Needs Assessment using 2010 US Census data is included in the Appendix.

(2) Vacancy Rates. At any given time, a number of homes within the community are vacant. We have assumed a 4.6 percent vacancy rate for 2014 and 2034. This rate is

based on information collected from Census and ACS data. Donald's housing vacancy rate was 14.4 percent in 2000 and 6.7 percent in 2010. The vacancy rate in Donald has been consistently dropping as its population grows faster than its housing stock growth. Consequently, we use the lower ACS vacancy rate of 4.6 percent.

(3) Persons per household. Using ACS data to make the calculation, we have assumed that the number of person per household is 2.55 persons, and that the household size will remain the same through the planning period ending in 2034 as allowed by OAR 660-24-0040(8)(a). Data from the 2000 Census showed 3.01 persons per household, and 2010 Census data showed 2.82 persons per household. The figure we use, 2.55 persons per household, reflects consistent decrease in household size that has been shown in the data.

(4) Group Quarters. The U.S. Census Bureau classifies all persons not living in households as living in group quarters. Persons living in group quarters include persons who are institutionalized or living in non-institutional group homes, rooming houses, assisted-living facilities, etc. This definition also includes students living in college dormitories. Donald currently does not have any number of its population living in group quarters. The percentage of persons living in 'group quarters' is assumed to remain constant in both 2014 and 2034.

(5) Under safe harbor OAR 660-024-0040(8)(i) Incremental Housing Mix, the ratio of newly constructed multi-family units over the 20 year planning period can be increased by 15 percentage points in order to determine the new housing mix under the medium density zone at the end of the 20 year planning period.

(6) The analysis cannot predict any major changes in the economy and any associated impacts to local household income. We assume that economic conditions in 2034 are similar to those in 2014.

Projected Housing Needs

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 (ORS195.036). As shown in **Table 7**, a total of 856 dwelling units will be needed to accommodate this population. This represents 465 additional housing units that will be needed for the period through 2034.

Table 7
Projected Housing Status
Donald, 2034

2034 Population (Projected)[1]	Persons Per House-hold	Total Housing Units[2]	Occupied Dwelling Units[3]	Projected Multi-Family Units	Projected Single Family Units	Vacant Units[4]	Multi-Family Units (Percent)	Single Family Units (Percent)
2,085	2.55	856	818	85	771	38	90.1%	9.9%

Source: MWVCOG, Memorandum to Donald Technical Advisory Committee, January 2015

[1] The 2034 population projection has been coordinated with the projections for Marion County as required by Oregon Revised Statutes 195.036.

[2] Total dwelling units do not include group quarters dwelling units.

[3] Occupied dwelling units do not include group quarters dwelling units.

[4] Based on an assumed vacancy rate of 4.6 percent

Housing Plan

It is the purpose of the housing plan to provide opportunities for the development of a wide variety of housing types to meet the needs of the citizens of Donald. Adequate safe and sanitary housing should be available at varying prices and rent ranges to existing and future residents of the City.

Housing Policy

It is the policy of the City to encourage the maintenance, conservation, and rehabilitation of existing residential areas and housing stock within the community. Preservation of older housing is essential because of the limited amount of available housing and the need to provide decent housing within the financial reach of all the residents of the City. The following are the city of Donald's Residential Development policies and goals:

1. Encourage the development and maintenance of an adequate quantity, quality and variety of housing facilities to satisfy the desired life styles and financial capabilities of the community.

2. Provide the necessary public facilities and services to maintain a safe, healthful, and pleasing living area.

3. Promote the improvement or removal of existing housing facilities that do not provide adequate, safe, or healthful living conditions.

The renovation of existing housing can best be accomplished through an active rehabilitation program. The principal deterrent to home rehabilitation has been the lack of adequate financing and a lack of knowledge of the funding that is available. The tax increase that results from major residential improvements has also discouraged homeowners.

There are several federal and state programs available for home rehabilitation. These are explained more fully in the following pages. Financing for weatherization is also presently available from the state and federal governments. Special efforts will have to be made to insure that families with low and moderate incomes take advantage of available rehabilitation loans or grants.

In addition to the maintenance of existing housing stock, it is essential that the City encourage and support the construction of new housing units as soon as public facilities are improved and can support them.

It is the policy of the City to encourage the development of multi-family housing adjacent to the commercial district of the City. Housing units located in this area would provide residents with convenient access to shopping and services. This would particularly benefit elderly individuals and the transportation disadvantaged.

The desired result of developing multi-family housing is to increase the range of housing types at varying rent levels available to residents of Donald.

In consideration of the limited employment opportunities available in the City and in order to maintain the desired densities, multi-family structures should contain no more than four dwelling units. The density of dwelling units shall be limited to 9 per acre in multi-family zones and 6 per acres in single family zones.

Thirty-five percent of the housing units in Donald consist of mobile homes. It appears that mobile homes are meeting some of the housing needs of those with moderate or low incomes and they are presently distributed throughout the City. Mobile homes are permitted in all residential zones and are not allowed in Commercial or Industrial zones. Provision for mobile home subdivisions and mobile home parks are listed in the zoning and subdivision ordinances of the City.

Subsidized Housing

A community attitude survey of local officials conducted in October, 1973 offered some insight into the housing situation of the City. The survey indicated that homes are valued too high for the incomes of those families looking for housing and there are no apartments available to meet the needs of these individuals. There is no policy that would prohibit a low income housing project in Donald.

There are several subsidized housing programs available to individuals, homeowners, and renters. The limited number of subsidized units in Donald seems to indicate that people are not aware of the programs available to them.

Existing Federal and State Housing Assistance Programs

The following state and federal housing assistance programs are available to qualifying low and moderate income persons.

Farmers Home Administration: Farmers Home Administration (FmHA) assistance is available under the following general restrictions:

A dwelling must be modest in size, design and cost: an applicant must be without adequate housing and be unable to secure the necessary credit from other sources. Further information about the following programs can be obtained from the Farmers Home Administration office in Salem (399-5751).

1. Rural Housing Loans - Section 502 - This direct loan can be used for new construction, rehabilitation or purchase of existing housing.

2. Housing Repair Loans and Grants - Section 504.

Department of Housing and Urban Development:

1. Section 8 - Housing Rental Subsidy Program - Information about this program can be obtained from the Marion County Housing Authority (364-0161)

2. Revised Section 235 Program - This program provides assistance to moderate income families for the construction of new dwellings or the substantial rehabilitation of existing houses.
3. Homeowner Deductions of Mortgage Interest and Real Estate Taxes- This program allows homeowners to deduct mortgage interest payments and local real estate taxes in determining their taxable income.
4. Donald could be eligible for housing rehabilitation funds through the Department of Housing and Urban Development's block grant program administered by the Marion County Housing Authority.

State of Oregon Programs:

1. State Homeowners Program - This program seeks to provide homeownership opportunities for moderate income persons.

2. Homeowner and Renter Property Tax Refund Programs.

3. Elderly Rental Assistance Program.

4. Repair Incentive/Deferred Maintenance - this legislation allows homeowners to make specific repairs without increasing property taxes.

5. Deferred Collections of Property Tax for Elderly.

Salem Non-Profit Housing: This agency provides counseling for those in need of improved housing.

They also administer Farmers Home Administration 504 grants, assist individuals with 502 applications and administer Community Services Association grants for remodeling improvements that are needed for safety, health, and welfare.

Further information about housing assistance programs can be obtained from the Housing Opportunity Plan prepared by the Mid-Willamette Valley Council of Governments (September, 1977) or from the Marion County Housing Authority.

Residence of the city of Donald will not be able to take full advantage of these programs until the sewage system has been developed. This is due to the requirement in many of the programs that housing units eligible for funding be located in cities with full urban services. At the present time all housing construction has been restricted due to the soil's inability to support any additional septic system. Therefore, subsidies for rural housing construction also of no benefit to Donald are also of no benefit to Donald residents.

Residential Land Use Policy

All residential development within the city of Donald shall conform to the state building, electrical, plumbing, and fire codes. Residential development shall be encouraged in a compact and efficient manner to provide the needed housing units for varying income levels, reduce the amount of land used for residences, conserve energy supplies, and facilitate the provision of public facilities and services in an efficient and economic manner. Residential development shall be discouraged in the central business section of the City. Multi-family housing will be encouraged to locate near the shopping and public facilities area. Varying lot sizes and

configurations shall be encouraged in order to provide for a variety of housing types, densities, and designs.

Medium density development shall average 9 units per acre. By averaging density, those areas that can support a higher density will offset areas of lower density.

High density development shall average 12 or 16 units per acre to encourage a compact urban design and provide for a variety of housing units to satisfy the needs of all income levels. Duplexes and town house construction shall be encouraged in order to mix housing types within single-family neighborhoods.

COMMERCIAL LAND USE

As of April, 2015 there were 36 commercial businesses within the Donald Urban Growth Boundary. In addition, there are four used for public purposes: City Hall, Post Office, Fire Hall and City Water and Sewer System

The commercial district of Donald is located between Butteville Road and the Burlington Railroad tracks and extends one block on each side of Main Street. There are approximately 8 acres of commercial land and it is not anticipated that any additional acres will be needed during the planning period.

. There are limited employment opportunities in the Donald Area which are not sufficient to fully support the working people of the city. Many residents of Donald commute to jobs that are outside of the city. There are, however, businesses within the City of Donald that employ a sizeable number of people: GK Machine, Wilco Farmers, and Propane Northwest are three of the largest in the City.
According to the 2009-2013 American Community Survey, the average annual income in Donald was approximately $56,161 and the median value of a single-family housing unit was $169,200. **Table 8** shows the Median Household Income of Donald as it compares to Marion County and the State of Oregon.

Table 8
Median Household Income
Donald, Marion County, and Oregon, 2009-2013

Location	Median Household Income
Donald	$56,161
Marion County	$46,885
Oregon	$50,229

Source: U.S. Census Bureau, 2009 – 2013 American Community Survey

Commercial Development Policy

It is the policy of the city to encourage development of a wide variety of businesses and employment opportunities for the citizens of Donald. It is important that the city is able to provide adequate infrastructure for existing and incoming business developments. To create a central downtown shopping district in Donald, efforts should be made to recruit commercial businesses to the downtown core. Downtown development design standards could be implemented, to ensure a uniform pedestrian-oriented central shopping area that is accessible to all citizens. The following are the city of Donald's Commercial Development policies and goals:

1. Discourage strip mall-type development

2. Promote the preservation and development of the central business district.

3. Encourage and provide for pedestrian-oriented central shopping area.
4. Develop design standards for downtown commercial development

5. Efforts should be made to encourage and support commercial businesses in the downtown core

Commercial Land Use Policy

1. The City shall inventory vacant and underutilized commercial land and assess community economic development potential. Commercial development will be encouraged in all areas designated for commercial uses. It is recognized that commercial uses contribute not only to the private market, but also help support the local tax base, economy, and employment of the area, Careful attention shall be paid in achieving a balance between commercial and residential development to avoid high business turnover and instability in the local economy.

INDUSTRIAL LAND USE

As of April, 2015The City of Donald has 12 industrial businesses located within the Urban Growth Boundary. The industrial district is located primarily in the north to north west part of the City. In Donald, there are over 70 acres of land zoned Industrial or Employment Industrial. There are a range of businesses but the largest is GK Machine along Donald Road NE. There is an abundance of industrial land available for development in Donald and it was not found that additional industrial acres will be needed during the planning period.

The most recent forecast provided by the Oregon Employment Department estimates the region's employment will grow by 14 percent from 2012 to 2022, resulting in an average annual growth

rate of 1.4%. This same growth rate was extrapolated throughout the 20 year planning horizon through the year 2034 to develop employment projections for Donald. Table 9 shows the 1.4% average annual job growth rate applied to Donald employment.

Table 9
Total Employment Projection for 2034

Industry	Sector	2013		2034	
		Percent	Total	Percent	Total
Construction (23)	Industrial	38.4%	145	38.4%	192
Wholesale Trade (42)	Industrial	15.1%	57	15.1%	75
Other Services (except Public Administration) (81)	Commercial	1.3%	5	1.3%	6
Public Administration	Commercial	1.0%	4	1.0%	5
Confidential Industries (11, 31, 44, 48, 53, 54, 56, 72)	Industrial/ Commercial	42.6%	161	42.6%	213
All Public Sector	Public	1.6%	6	1.6%	8
Total		**100%**	**378**	**100%**	**499**

Source: Oregon Employment Department

Industrial Development Policy

It is the policy of the city to encourage development of a wide variety of industries and employment opportunities for the citizens of Donald. By providing local employment opportunities for the citizens of Donald, the city can encourage a balanced and diversified economic base. This can be done by not only recruiting new industry to the city but also by retaining large employers that are currently located within the city. The following are the city of Donald's Industrial Development policies and goals:

1. Promote and encourage compatible industrial development.

2. Provide for the community's need for local employment opportunities by encouraging a balanced and diversified economic base.

3. Efforts should be made to recruit and retain existing manufacturing and agricultural focused business.

Industrial Land Use Policy

1. The City shall inventory vacant and underutilized industrial land and assess community economic development potential. The City of Donald shall strive to encourage the development of compatible industry in Donald. It is recognized that industrial uses create

jobs, markets, and an expanded tax base, and also have the potential of altering the quality of the environment, overloading public facilities, and increasing the demand for housing. Since there is rail service available and direct access to Interstate 5, the potential for industrial development exists. Prospective industrial uses shall be reviewed for consistency with the Comprehensive Plan, Zoning, and Environmental Regulations. Heavy industrial uses shall be located and screened away from residential uses to minimize the effects of industrial activity.

2. Some locations may be more suitable for employment related industrial uses including warehousing, primary and secondary processing, packaging, fabricating of finished goods and equipment with related outdoor storage and incidental sales. These are locations that have access to an arterial street or highway and where the noise, light, odors and traffic generated by these uses will not conflict with residential areas. The City of Donald shall adopt zoning regulations to limit commercial uses—such as retail, storage, and service uses that cater to daily customers—to protect the employment capacity of these locations.

PUBLIC AND SEMI-PUBLIC LAND USES

There are approximately 2 acres of public or semi-public uses in Donald. Such uses include City Hall, Post Office, churches, water facilities, Fire Hall, etc. There are no public parks within the existing city limits. The nearest recreation facility is Champoeg Park to the north and the Willamette River to the west.

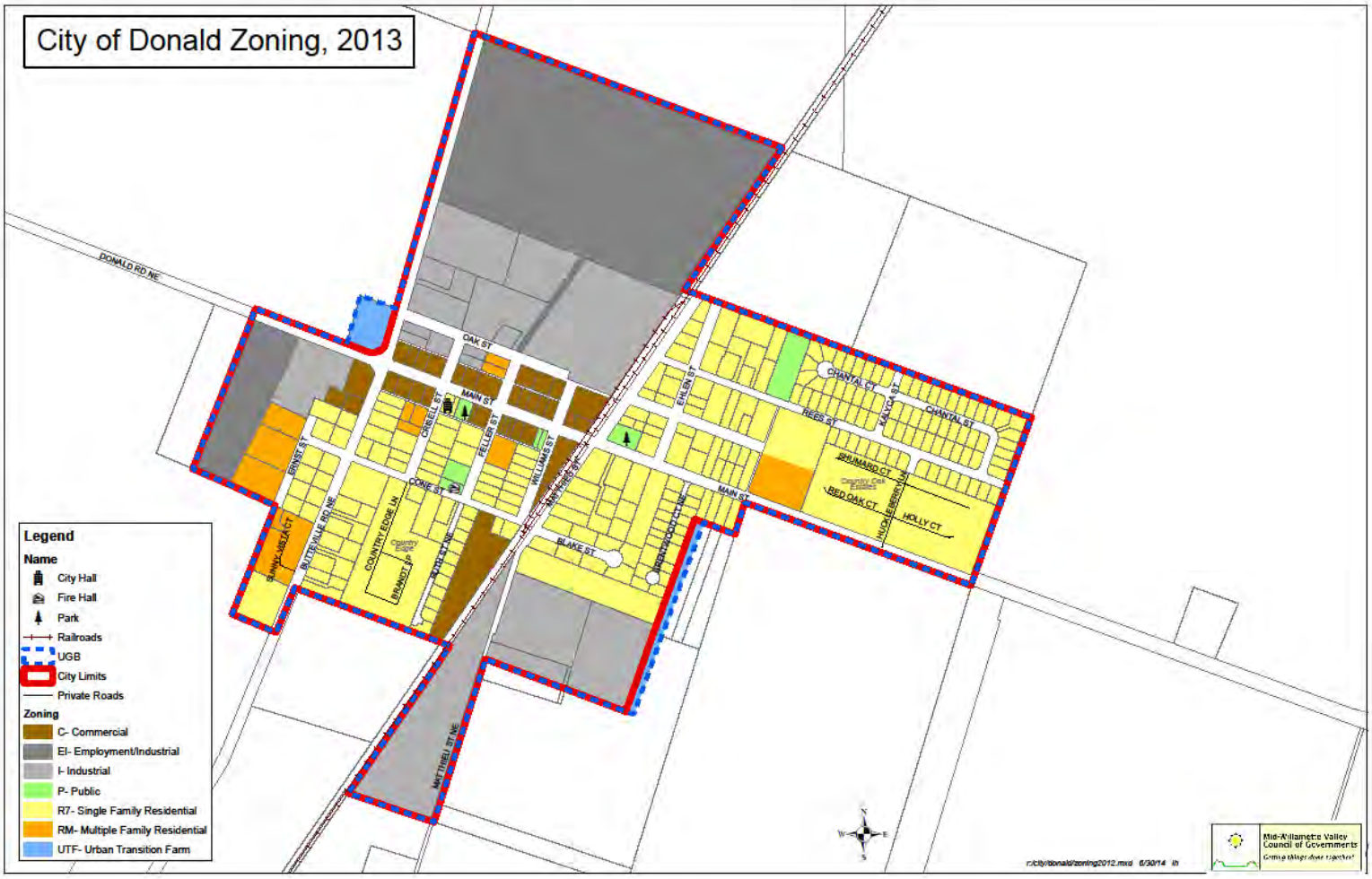
It is expected that new subdivisions will be required to set aside land for park purposes. The Land Use Plan does not indicate specific locations for parks; however, park land will be provided by developers in the medium density land use areas.

Other public uses are not expected to be developed and, with the exception of sewage treatment facilities, no expansion is anticipated in the public land uses. The sewage treatment plant is anticipated to be outside the urban growth area and will not be considered a public use in the planning area.

Public and Semi-Public Land Use Policy

The development of public uses such as parks and recreational facilities shall be encouraged to provide a balanced use of lands. The development or expansion of public building shall conform to the plan policies, ordinances, and building regulations of the City of Donald and other agencies.

There are no designations on the Comprehensive Plan Map for Agricultural Use.



LAND DEMAND ANALYSIS

The buildable lands inventory is used in conjunction with the 2034 population projection to determine if adequate land is available for future residential, commercial, and industrial development.

Future Residential Land Needs

Residential Densities

To determine the amount of land needed for future residential development, it is necessary to calculate the average net density for the various types of housing developments including single-

family and multi-family. Building permit data dating back to the year 2000 is used to determine densities at which units have been built in the past.

The average net densities used to conduct the analysis of future residential land needs are:

- Single-family residential – 6.22 units/acre
- Multi-family residential – 11 units/acre

The origin of these densities is described below.

Single-Family Development

Since 1999, eight (8) subdivisions have been approved and at least partially developed. **Table 10** shows recent single-family residential development. This includes subdivision development and infill development through the partitioning process. During this period, 116 single-family dwelling units have been developed on 17.893 acres. The resulting average net density of the development is 6.48 units per acre.

Table 10
Single-Family Residential Development
Single Family residential (R-7) – 5.07 units/acre

Subdivision	Zone District	Single-Family Units	Net Acres Developed	Net Density (units/acre)
SUB-01-02, Green (Map 041W17, Lot 1700	R-7/R-5*	79	12.2	6.5
SUB-01-01, Blake (Map 041W17CB, Lot 6000)	R-7/R-5*	11	1.78	6.18
SUB-02-01, Brandt (Map 041W17, Lot 500)**	R-7/R-5*	21	2.9	7.24
1999 Partitions	R-7/R-5*	3	0.69	4.35
2002 Partitions	R-7/R-5*	2	0.323	6.2
Total		**116**	**17.893**	**6.48**

Source: Marion County Assessor Records and MWVCOG 2014

The historic average single-family density from **table 10** above is listed as 6.48 units per acre. However, the city recently changed the minimum lot size in the R-7 single family residential zone from 5,000 square feet to 7,000 square feet. A minimum lot size of 7,000 square feet correlates to a maximum density of 6.22 units per acre. Therefore, it is assumed that any new single family units will not be built at a density higher than 6.22 units per acre.

Multi-Family Development

Since the year 1999 there has been no construction of multi-family housing units in Donald and, therefore, no historical average density data is available. In assigning an appropriate average density of multi-family housing units, it should be taken into account that any multi-family units constructed must fall within the minimum and maximum density allowed in the RM zone, 8 units per acre and 14 units per acre, respectively. Therefore, the assumption for multi-family housing density is 11 units per acre, the median density in the RM zone.

Future Residential Land Needs

As shown in **Table 11**, the housing needs analysis identified 465 new residential units that will be needed to accommodate the projected 2034 population of 2,085 persons. Of the 465 new residential units, 16.8 percent, or about 78 units, are needed to meet projected need for multi-family units. With an assumed density of 11 units per acres for multi-family, 7.1 acres is required to meet the need for the new units. At a density of 5.07 single family units per acre, the additional 387 single family units require 76.3 acres. In total, the 465 new units can be built on 83.4 acres of land.

Table 11
Projected Housing Mix and Residential Land Needs2034
Source: ACS

Housing Type	Existing Units	Additional Units Needed 2034	Percent of New Units	Net Density (units/acre)	Acres Needed 2034
Single Family	384	387	83.2	6.22	62.2
Multi-Family	7	78	16.8	11	7.1
Total	391	465	100.0	-	69.3

Source: 2009-2013 American Community Survey

Looking back at the Buildable Lands Inventory, there is inadequate vacant, partially vacant, or redevelopable land available to accommodate future housing needs within the existing urban growth boundary. The buildable lands analysis found that approximately 9.93 acres are available for residential development within the entire urban area. It is estimated that 76.7 acres will be needed to accommodate future residential growth. Oregon Administrative Rules (OAR) 660-024-0040(9) allow for a local government to estimate that the 20-year land need for streets and roads, parks, and school facilities will together require an additional amount of land equal to 25 percent of the net buildable acres determined for residential land needs**.**

Table 12
Summary of Residential Land Needs, 2034

Determining Surplus or Deficit of Residential Land	Acres
2034 residential land needs	69.3
Additional land needed for public uses- streets, parks, etc. (25% of 20-year land needs)	17.3
Total land needed for residential use through 2034	86.6
Land currently available within the existing UGB for residential development	9.93
Surplus or (Deficit) of land needed for future residential use	(76.7)

Source: MWVCOG Memorandum to Donald Technical Advisory Committee January 2015

Table 12 shows adding the 25 percent for public land uses as allowed by OAR 660-024-0040(9) means that an estimated 17.3 acres will be needed to accommodate Donald's 20-year land needs for future residential development. The buildable land needs analysis found that approximately 9.93 acres are available for residential development within the entire urban area. Subsequently, Donald has 76.7 acre deficit of land available to meet the estimated population and housing mix in 2034.

Urban Growth Boundary Expansion to Address Projected Residential Land Needs

In order to address the projected housing and residential land needs determined by the Buildable Lands Inventory and Housing Needs Analysis detailed above, the City of Donald conducted an Urban Growth Boundary Expansion Study and Alternatives Analysis pursuant to Oregon Administrative Rules (OAR) 660-024-0065 through 660-024-0067. With adoption of City Ordinance No. 171-2018, the Donald City Council approved an 87.6 acre Urban Growth Boundary Expansion which included 76.7 acres of residential land and 10.9 acres of public facility land. The 76.7 acres of residential land were assigned Comprehensive Plan Map Land Use Designation of Residential. The 76.7 acres of residential land were assigned an interim zoning designation with Marion County of UT-Urban Transition, in order to maintain current agricultural practices until properties are annexed into the city limits. The 76.7 acres of residential land were also assigned the future City of Donald zoning designations of 7.59 acres of RM-Multiple Family Residential and 69.11 acres of R7-Single Family Residential Zone, effective upon annexation into the city. The 2018 Urban Growth Boundary expansion satisfied the full residential land need to accommodate the projected housing need through 2034, as demonstrated in the 2015 analyses.

Future Commercial and Industrial Land Needs

Statewide Planning Goal 9 (Economic Development) requires cities to provide an adequate supply of suitable sites for a variety of industrial and other employment uses. This section of the Donald Comprehensive Plan serves as an Economic Opportunity Analysis (EOA) to fulfill the

Goal 9 requirements and ensure an adequate supply of land is available for new and expanding businesses in Donald over the 20 year planning horizon. Among other uses, an EOA also helps a community better understand its economy and plan for economic development initiatives. This element of the Comprehensive Plan includes a description of the economic trends combined with an assessment of the community's economic strength and weaknesses to determine the economic development potential of the area.

This chapter also includes a description of the amount of land and types of sites needed to fulfill Donald' economic needs over the next 20 years. This assessment of future land needs is compared with the supply of vacant and underutilized commercial and industrial lands available to determine whether or not there are any deficiencies in the land supply. The chapter concludes with a discussion of the planning implications and policy recommendations.

Overview of the Donald Economy

The City of Donald lies along the I-5 corridor. While it has not witnessed the growth and prosperity associated with recent high-tech developments in the region, it has received interest from several property and firms to establish commercial or industrial enterprises in the City. Recent population growth is likely based on the community's relatively lower housing costs, but until now has had the effect of creating a bedroom community to Portland and Salem rather than establishing new employment opportunities. The community has several areas available for industrial and commercial development. These include approximately 30 acres of industrial land located along Butteville Road near Ehlen Road and a strip of available commercially zoned lots along Main Street.

Table 13 shows employment data for the Donald area based on employer records with a Donald address. Much of the employment for Donald residents is in the agricultural production industry and mining sector.

Table 13
Donald Employment
2013

Industry	Number	Percent
Construction (23)	145	38.4%
Wholesale Trade (42)	57	15.1%
Other Services (except Public Administration) (81)	5	1.3%
Public Administration	4	1.0%
Confidential Industries Combined (11, 31, 44, 48, 53, 54, 56, 72)	161	42.6%
All Public Sector	6	1.6%
Total	**378**	**100%**

Source: State of Oregon Employment Department data, sorted and summarized by MWVCOG, 2015.

Table 14 shows covered employment data for the counties of Marion, Yamhill, and Polk. Combined employment in the counties reached 184,309 in 2013. The Employment Division reports that manufacturing employment in the area is varied, with wood products and food and beverage manufacturing accounting for almost two-thirds of manufacturing employment. Food and beverage employment in the region comprises the same employment percentage as in the county, despite several cannery closures in recent years.

Table 14
Marion, Yamhill, and Polk Counties Covered Employment by Industry
2013

Industry	Employment	Percent
Trade/Transportation/Utilities	28,423	15.4%
Natural Resources/Mining	14,748	8%
Government	42,770	23.2%
Manufacturing	18,155	9.9%
Education/Health Services	27,495	14.9%
Construction	7,886	4.3%
Leisure/Hospitality	16,080	8.7%
Professional/Business Services	13,551	7.4%
Other Services	6,976	3.8%
Financial Activities	7,032	3.8%
Information	1,193	6.5%
Total	**184,309**	**100.0%**

Source: State of Oregon Employment Department, Employment Snapshot of Marion, Yamhill, and Polk Counties, 2014.

National Economic Trends

There are a number of factors that will affect future development and employment opportunities in general, and more specifically to the region. National trends represent broad changes in the economy that will influence economic development in the region over the next 20 years. These trends include:

- The aging population of the workforce as the “Baby Boomer” generation is reaching retirement age.
- Increasing Hispanic and Latino Migration.
- The growing importance of education as a determinant of wages and household income.

- Growth in global trade.
- Technological innovation increasing worker productivity.
- The decline of employment in resource-intensive industries and the increase in employment in service-oriented and high-tech manufacturing sectors of the economy.
- Increasing cost and demand of energy
- A growing concern of environmental impacts and energy efficiency.
- Continued westward migration of the U.S. population and the increasing role of amenities and other non-wage factors as determinants of the location decisions of households and firms.
- Changes in preferences placing a premium on environmental quality.

State Economic Trends

Economic development in Donald will also be affected by economic trends in Oregon and the Willamette Valley. The following sections describe recent trends in population, income, and employment growth in Oregon, the Willamette Valley, and Marion County, and the economic outlook for Oregon.

Population Growth

The state of the national economy influences local population growth. As shown in **Table 15**, growth was slowed due to the recession in the early 1980s. However, growth rates for Donald and Marion County exceeded the growth rate for Oregon during the expansionary economic periods in the 1990s. During the period between 1980 and 2010, the population of Donald has nearly tripled. Population growth in Donald has quickened for the period from 2000 through 2010 and is greater than both the county and state.

Table 15
Population
Oregon, Marion County, and Donald 1980-2010

Location	1980	1990	2000	2010	*Average Annual Growth Rate*		
					1980-90	1990-00	2000-10
Oregon	2,633,156	2,842,321	3,421,399	3,582,600	2.3%	1.7%	1.2%
Marion County	204,692	228,483	284,834	315,900	1.1%	2.2%	1.04%
Donald	331	476	608	979	3.7%	2.48%	4.88%

Source: U.S. Census and the Center for Population Research and Census, Portland State University.

Personal Income

Table 16 shows the most recent median household income and the percentage of households below the poverty level in Donald, Marion County, and Oregon from the 2009-2013 ACS. Median household income for Marion County was slightly less than for Oregon. In Donald, median income actually exceeded that of Marion County and the State of Oregon. Also, the percentage of families living below the poverty level was less than in the county and state.

Table 16
Median Household Income and Percent of Households Living Below Poverty Level
Donald, Marion County, and Oregon, 2009-2013

Location	Median Household Income	Families Below Poverty Level
Donald	$56,161	7.4%
Marion County	$46,885	14.3%
Oregon	$50,229	11.2%

Source: US Census Data and 2009-2013 American Community Survey – 5 year estimates.

Regional Economic Trends

The Oregon Employment Department states that both the local and statewide economies are continuing to shift from a reliance on resource extractive industries and manufacturing towards information, and services and high-tech manufacturing. As a result, jobs are being lost in some sectors as they are being added in others. Marion, Polk, and Yamhill counties have traditionally been dependent upon state government, agricultural, and wood products as the predominant sources of local employment.

Table 17 shows projected employment within Marion, Polk, and Yamhill counties for the period from 2012 through 2022. Industry employment in the region is expected to grow from 183,200 in 2012 to 208,700 in 2022. This represents a growth rate of 14 percent. In comparison, Oregon's statewide industry employment is projected to increase by 15 percent over that time.[2]

Table 17
Employment Projections by Selected Industry
Marion, Polk, and Yamhill Counties, 2012 and 2022

Industry	2012	2022	Percent Change
Total Non-Farm Payroll Employment	183,200	208,700	14%
Manufacturing, Total	17,500	19,800	13%
Durable Goods	8,600	9,800	14%
Non-durable Goods	8,900	10,000	12%
Non-Manufacturing, Total	165,700	188,900	12%
Construction	7,300	9,500	30%
Finance, Insurance, Real Estate	8,100	9,200	14%
Wholesale and Retail Trade	23,500	25,900	9%
Government	43,800	47,300	8%

Source: State of Oregon, Employment Department. *Employment Projections by Industry and Occupation 2012-2022, March 2014.*

The Oregon Employment Department indicates that the construction industry will experience the most significant job growth within the region through 2022. The region's agricultural and food processors will continue to struggle as they face national and international competition. Government employment is forecast to grow more slowly than the average of all industries over the period through 2022.[3]

Local Economic Trends

The next section examines supply-side factors that may affect business location and development in Donald.

Factors Affecting Forecasted Growth

[2] Oregon Employment Department, *EMPLOYMENT PROJECTIONS BY INDUSTRY AND OCCUPATION 2012-2022 Mid-Willamette Valley (Marion, Polk, Yamhill)*, March 2014.
[3] Oregon Employment Department, *EMPLOYMENT PROJECTIONS BY INDUSTRY AND OCCUPATION 2012-2022 Mid-Willamette Valley (Marion, Polk, Yamhill)*, March 2014.

The existing pattern of development in Marion County reflects the influence of locational factors and comparative advantages in the region and this pattern is unlikely to change substantially in the future. Donald developed, in part, based on its proximity to agricultural land within the Willamette Valley. Over time, the community has developed as essentially a bedroom community to larger communities such as Portland and Salem.

The following sections discuss supply-side factors that may affect business location and economic development in Donald.

How Firms Make Business Location Decisions

The main goal for business firms is to locate where they can maximize revenue and profits. By merely listing all relevant location considerations, a decision maker can add all the costs and benefits accruing to a facility at each potential location. The location with the lowest net costs (after subtracting benefits) is in most situations the best location. Alternative locations should be compared for the cost of material and energy inputs, including the charges for transporting them, the cost of employees (wages, salaries, benefits, payroll taxes, unemployment insurance, and training costs), construction or purchase and remodeling costs, taxes on corporate property, income, and inventory, and public incentives for new investment. Personal income taxes and housing costs are relevant to the extent that they represent a cost differential for current employees whom the company wants to relocate to a new location. These considerations are measurable, and can be added (or subtracted) for each potential location. Other considerations are less quantifiable, such as the availability of workers with particular skills, the appropriateness of an existing building, the quality of life, or the likelihood of competitive reaction to the company's investment.

Quality of Life

Quality of life is a subjective standard that is hard to quantify. It includes economic factors, such as income, employment, and housing costs, as well as non-economic factors, such as natural and physical amenities, quality of local education, and cultural and recreational opportunities. Economic factors are discussed elsewhere in this report.

Quality of life plays a role in economic development because it affects the relative attractiveness of the city to migrants. Migration is expected to contribute over two-thirds of the population growth of Oregon in the next decade.[4] A more attractive quality of life may help Donald attract a greater share of in-migrants. These migrants not only bring job skills to various employment sectors, such as construction, services, and retail trade, but some may also start new businesses in the community. Donald has much to offer in the way of amenities such as its proximity to

[4] Oregon Office of Economic Analysis, *Oregon's Demographic Trends*, 2012.

Champoeg State Park, green space located on its Main Street, historic buildings, and low housing cost. Additionally, work has begun to attract a market to Main Street where residents can get fresh produce; this addition to the city would contribute to quality of life.

Transportation

Available transportation access is one of the most important factors affecting economic development. Transportation affects the cost of doing business at a location. Firms depend on ready transportation access to ship and receive goods. Ready access allows for reduced production costs and more convenient automobile access for customers and employees.

Interstate 5 serves as the primary transportation artery in the Willamette Valley and is located approximately two (2) miles west of Donald. I-5 directly connects the markets of Salem, Portland and beyond with the city. Access to I-5 from Donald is available via Ehlen Road. A highway interchange where Ehlen Road meets I-5 has sparked development of many convenience markets and gas stations; services that are not available within the Donald City Limits.

Railroads can be an important form of transportation for businesses that need to transport bulky inputs and finished products. Donald is served by the Southern Pacific Railroad that runs north/south, passing directly adjacent to much of the community's industrial land.

Located approximately 5 miles northeast from Donald is the Aurora Airport. The Aurora State Airport is the busiest State-owned airport and the overall fifth busiest airport in Oregon. The facility serves a wide-range of charter, corporate, and recreational users and there are a number of businesses at the airport providing services such as fuel sales, maintenance, storage, charter, aircraft sales, and flight training. Donald's proximity to the Aurora Airport makes Donald a more attractive location for business because it offers ease of access to the city for long-distance travelers.

Labor Force

The cost, availability, and skill-level of the local labor force can affect the comparative advantage of a community. The Oregon Employment Department notes that in recent years, employers in the mid-Willamette Valley have expressed concerns regarding recruiting and retaining skilled workers.[5]

5 Oregon Employment Department, *2000 Regional Economic Profile - Region 3, 2000.*

The unemployment rate for Marion County has been slightly higher than Oregon's unemployment rate since 2009. During that period, unemployment in Marion County peaked at 11.3 percent in 2009.[6] This rate has steadily declined to 7.2 percent in 2014.

During the peak growth period in the mid-1990s, annual net migration was more than triple the gains due to natural increase. However, as the nation's economy slowed down in the late 2000's, migration flows slowed, and natural increase contributed a greater portion of annual population growth.[7] During the period from 2005, to 2010, Marion County ranked 10th among Oregon's counties with a net migration of 4,768 new residents.

The Oregon Employment Department notes that in-migration will be a critical factor in the determining long-term growth in Region 3.[8] Not only do new residents create demand for goods and services, but they also supply additional workers. For the period from 2010 through 2035, Marion County's population is projected to grow by grow by about 24.8 percent. Net-migration is projected to account for approximately 53 percent of that population growth.

Training Opportunities

The Woodburn Campus of Chemeketa Community College (CCC) offers workforce training and career development services. In concert with the Oregon Employment Department, CCC has developed the Woodburn Job and Career Center to assist job seekers find available jobs and receive training to enhance their job skills. The Job and Career Center can also provide specialized training workshops for employers.

The Woodburn Campus also offers services to support small business owners through training programs, mentorships, and information on other available resources such as Small Business Administration Loans.

Land Cost

The OregonProspector.com is the state's official public-private website for site consultants and businesses interested in relocating or expanding a business in Oregon. This site provides an on-line database of available commercial and industrial properties in Oregon. The most recent database listing shows three (6) vacant properties in Marion County several of which are in Salem. These properties range in size from 2.25 acres to 29.8 acres. Sale price listed for only one of the properties at $206,909/acre.

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6 Oregon Employment Department data, not seasonally adjusted, 2015.
7 Portland State University, Center for Census and Population, *Oregon Outlook*, December 2014.
8 Oregon Employment Department, *Oregon's Demographic Trends,* December 2012

One of the properties listed is in Donald, Marion County Assessor records show that the real market value of this lot is $81,000/acre. While this obviously does not represent a comprehensive market survey, it does indicate that land costs, particularly in relation to the Salem market, may be lower in the Donald area. Lower land cost is often a primary reason for the firms to locate in smaller communities.

Utilities

The City has recently expanded its sewage treatment capacity, but with recent growth, the City has experienced increased and substantial demands on its water treatment and distribution system.

The City derives its water from two wells. Many of the City's distribution lines are undersized. In addition to water quantity issues, the inadequacy of the water system creates a public safety problem. The limited treatment and storage capability could result in an inadequate water supply during fire fighting operations. During peak demand and, in particular, the summer months, the situation can become critical.

City Policies Affecting Economic Development

The Donald Comprehensive Plan includes a number of economic development related policies, which include:

1. *Discourage strip-type development*

2. *Promote the preservation and development of the central business district.*

3. *Encourage and provide for pedestrian-oriented central shopping area.*

4. *Promote and encourage compatible industrial development.*

5. *Provide for the community's need for local employment opportunities by encouraging a balanced and diversified economic base.*

Local Employment Growth Forecast

Regional employment projections show that non-manufacturing employment in Region 3 is projected to grow by about 12 percent through 2022 (see **Table 17**). Non-agricultural employment in Donald currently consists of a small number large manufacturing firms and several small retail and service businesses. Given the proximity to Portland, Woodburn and

Salem markets, efforts to diversify Donald's economy by attracting firms from a number of relatively high-wage industries, such as publishing, stone, clay, and glass manufacturing, transportation equipment, and others, are most likely be limited. If the city can make necessary improvements to its utilities, attract a diverse group of additional manufacturing firms to its existing industrial area, and revitalize the Main Street with several new commercial businesses including a produce market, this would be considered successful economic and job growth for the community.

Rather than attempt to project the number of new jobs created as a percentage of the region, which is relatively small, this analysis uses the "Safe Harbor" method to determine employment needs as identified in Oregon Administrative Rules (OAR) 660-024-0040(8). The Safe Harbor method assumes the number of jobs created in the city will grow at a rate equal to the regional job growth rate provided in the most recent forecast published by the Oregon Employment Department (OED). The most recent forecast provided by the OED estimates the region's employment will grow by 14 percent from 2012 to 2022, resulting in an average annual growth rate of 1.4%. This same growth rate was extrapolated throughout the 20 year planning horizon through the year 2034 to develop employment projections for Donald. **Table 18** shows the 1.4% average annual job growth rate applied to Donald employment.

Table 18
Total Employment Projection
2034

		2013		2034	
Industry	**Sector**	**Percent**	**Total**	**Percent**	**Total**
Construction (23)	Industrial	38.4%	145	38.4%	192
Wholesale Trade (42)	Industrial	15.1%	57	15.1%	75
Other Services (except Public Administration) (81)	Commercial	1.3%	5	1.3%	6
Public Administration	Commercial	1.0%	4	1.0%	5
Confidential Industries (11, 31, 44, 48, 53, 54, 56, 72)	Industrial/ Commercial	42.6%	161	42.6%	213
All Public Sector	Public	1.6%	6	1.6%	8
Total		**100%**	**378**	**100%**	**499**

Source: Oregon Employment Department

Because employment data provided by the Oregon Employment Department is limited due to employer privacy laws, some employment categories are combined. In **Table 18** above, line item Confidential Industries is a combination of all the industrials that have been kept confidential. Because this is a combination of industrial and commercial industries, this does not provide a clear picture as to the number of employees, by sector, within Donald. However, it is known that a large majority of jobs within the Confidential Industries category are in the industrial sector. In

order to best approximate the employment in each sector, this analysis assumes that 90% of the employment within the Confidential Industries category is in the industrial sector. Using **Table 18**, this analysis therefore assumes that industrial employment within the Confidential Industries category is 145 and 192, in 2013 and 2034 respectively.

Land Demand Analysis

A primary function of the Economic Opportunities Analysis is to determine if sufficient land is available to accommodate projected employment over the planning horizon. In order to accomplish that, the employment growth forecasted above must be aggregated into general land use categories. Next, the number of new jobs created for commercial and industrial use must be converted into the number of acres needed for commercial and industrial uses over the 20 year planning horizon.

Table 19 shows the 2034 total employment by land use type. Different sectors of the economy will have different land needs. Employment growth was allocated to three land use types as follows:

- Commercial: Retail Trade; Finance, Insurance, Real Estate; Services.
- Industrial: Construction; Manufacturing; Transportation, Communications, and Utilities; Wholesale Trade.
- Public: Government.

This analysis assumes growth in the public sector employment will occur on existing public lands and is therefore removed from future analysis.

Agriculture, Forestry, Fishing and Hunting are also removed as these are assumed to predominately occur outside of Urban Growth Boundaries.

Table 19
Total Employment Growth by Land Use Type
Donald, 2034

Sector	**2034**
Commercial	7
Industrial	112
Public	2
Total	**121**

Source: MWVCOG, 2015.

Several assumptions were made to convert the employment growth shown in **Table 19** to vacant acres needed by land use type. These assumptions include:

- **Percent of total employment growth that requires no non-residential built space or land**. Some new employment will not require any non-residential land or building be used. Some workers or business owners may work from their home. The 2010 Census showed that 1.7 percent of all workers in Donald worked at home. With the recent development of advanced telecommuting technology, this figure can be expected to increase. This analysis assumes that five (5) percent of employment growth will consist of employees who work at home. This figure is shown in **Table 20** under the column heading **"**Requiring no non-residential built space or land".

- **Percent of employment growth on existing developed land.** Some new employment will occur through expansion of existing businesses on non-residential land. Such an expansion involves adding additional employees without increasing physical space. A similar economic opportunities analysis for Albany assumed that 10 percent of future employment growth will occur on land that is already developed. That same figure is used in this analysis. This figure is shown in **Table 19** under the column heading "On Existing Developed Land".

- **Employees/acre**. In order to determine future commercial and industrial land needs, employment growth must be converted into employees per acre. The total number of employees in the commercial sector during 2013 is 25. From the Buildable Lands Inventory, there are 5.5 acres of developed commercial land within Donald. The resulting commercial employees per acre is 4.5. In the industrial sector, 347 jobs are located on 26.7 acres of industrial land, resulting in 13 employees per acre.

- **Employment on vacant or redevelopable land**. The recently completed buildable lands inventory for Donald identified both vacant and redevelopable commercial and industrial land. Redevelopable land is defined as parcels with improvement values of at least $10,000 (based on Marion County Assessor records). This analysis does not distinguish between vacant or redevelopable land in determining where new employment will occur. The analysis assumes that 85 percent of employment growth occurs on land that is either vacant or redevelopable. (The remaining 15 percent consists of employees working at home or new employment on existing developed land.)

Table 19 shows the amount of vacant or redevelopable land needed to accommodate new commercial and industrial employment growth through 2034. Approximately 4.18 acres will be needed to accommodate projected employment growth through this period.

Table 20
Land Need by Land Use Type
Donald 2034

Sector	Total Employment Growth	Employees/Acre	Requiring no non-residential built space or land	On Existing Developed Land	On Vacant Land	Vacant/Redevelopable Acres Needed
Commercial	7	4.5	0	1	6	1.3
Industrial	112	13	5	11	96	7.4
Total	119		5	12	102	8.7

Source: MWVCOG, 2015.

Table 20 shows a summary of the amount of vacant and redevelopable commercial and industrial land available within the Donald urban area. No site constraints, such as steep slopes, wetland, or floodways, were identified in the buildable lands analysis that would reduce the amount of land available for development.

Table 21
Commercial and Industrial Buildable Lands Inventory Summary
Donald, 2014

Zone/Plan Designation	Vacant (acres)	Redevelopable	Total Acres
Within City Limits			
Commercial	0.26	2.20	2.46
Commercial	**0.26**	**2.20**	**2.46**
Employment Industrial (EI)	0	0	0
Industrial District (I)	0.74	11.83	12.57
Industrial	**0.74**	**11.83**	**12.57**
Between City Limits & UGB			
Commercial (C)	0	0	0
Industrial (I)	0	0.89	0
Total	**0.00**	**0.89**	**0.89**
Donald Urban Area Total			
Commercial	**0.26**	**2.20**	**2.46**
Industrial	**0.74**	**12.72**	**13.46**
Total	**1**	**14.92**	**15.92**

Source: Marion County Assessor data, MWVCOG, 2015

Table 22 shows a comparison of land needed to accommodate new employment growth (demand) through 2034 and the available supply of vacant and redevelopable land. The comparison shows that sufficient commercial and industrial land is available within the Donald urban area to meet the forecast demand.

Table 22
Comparison of Supply and Demand for Commercial and Industrial Land
Donald, 2034

Land Use Type	Vacant/Redevelopable Acres
Supply	
Commercial	2.46
Industrial	13.46
Total Supply	**15.92**
Demand	
Commercial	1.3
Industrial	7.4
Total Demand	**8.7**
Surplus (Deficit)	
Commercial	1.16
Industrial	6.06
Total	**7.22**

Source: MWVCOG, 2015.

Table 23 shows the size characteristics of developed, vacant, and redevelopable commercial and industrial properties in Donald. Commercial uses in Donald have developed on properties that are between 0.08 and 2.24 acres in size.

For all zones, the average size of vacant and redevelopable properties is consistent with the average size of developed properties. A map in the Land Use section of the Comprehensive Plan shows all vacant and redevelopable properties, by zone within the Donald urban area.

In the Industrial (I) District, the mean size for vacant parcels is 1.73 acres and the average size of developed parcels is approximately 1.48 acres.

Based on this information, adequate sized sites are available within Donald to accommodate the types of uses that could be expected to locate in the city.

Table 23
Size Characteristics of Developed, Vacant, and Redevelopable Properties by Zone
Donald 2014

Zone/Plan Designation	Vacant			Redevelopable		
	Acres	Mean	Median	Acres	Mean	Median
Commercial (C)	0.26	0.1	0.13	2.20	0.14	0.11
Employment Industrial (EI)	0	0	0	0.00	0.00	0.00
Light Industrial Zone (I)	.74	.18	.14	11.83	2.9	3.5

Source: Marion County Assessor data, MWVCOG, 2015.

Key Findings and Future Planning Implications

Covered employment in Donald area in 2013 was 378 persons. Employment in Donald is dominated by agricultural employment, manufacturing, and construction, which together comprise about three quarters of the area's total employment.

Overall, the economy in Region 3 comprised of Marion, Polk, and Yamhill Counties, is expected to experience modest economic growth for the period from 2014 through 2034. Donald may be able to capitalize on that growth. Donald has some comparative advantages related to land costs and transportation, however limitations on the availability of public services to vacant industrial sites is a limitation to development. Competition from neighboring Aurora, Portland and Salem, who are attempting to attract high-wage manufacturing firms for a number of sectors, could also limit development potential. Local comprehensive plan policies are generally supportive of economic development.

Under an optimistic development scenario, projected employment for Donald through 2034 would add approximately 121 new jobs.

An adequate amount of vacant or redevelopable commercial and industrial land is available to meet the forecasted need through the year 2034. The type and size of available commercial properties are typical of sites that have been previously developed. Vacant industrial sites are slightly larger than those previously developed.

ATT B2

Urban Growth

URBANIZATION

Introduction

The City of Donald has not been faced with any pressure to develop land outside the city limits except for the Fargo Interchange on Interstate Highway 5. The Statewide Planning Goal Number 14 requires cities to adopt urban growth boundaries to separate urbanizable lands from rural lands. Based upon the results of a 2015 Housing Needs Analysis, an additional 76.7 acres of residential land will be needed to accommodate the project 2034 population. This number is based upon residential build out at current densities in Donald. Before a Comprehensive Plan Urban Growth Boundary amendment takes place, the city will need to look at increasing efficiency and density of residential development within the current UGB.

Purpose

The purpose of the Urban Growth Program is to establish policies and guidelines for the orderly development of urbanizable lands within the Urban Growth Boundary of Donald. The Boundary will indicate the areas in which city services such as water, sewer and drainage will be developed.

Delineation Of The Boundary

The Urban Growth Boundary is shown on Attachment "A" and is part of the Urban Growth Program. To determine the Boundary, several factors were considered:

1. The amount of land needed to accommodate the projected growth of Donald, based on the "208 Water Quality Management Program" population projections to the Year 2000.

2. The most cost effective areas for the extension of city services.

3. The desire to avoid including any Class I-IV agricultural lands in compliance with State Land Use Goal No.3.

4. The existing land area within the city limits and the land available for development.

Density and Population Projections

The amount of residential land within the Urban Growth Boundary is insufficient to meet the projected 2034 Donald population. There is, however, a sufficient amount of employment land to accommodate the 2034 projected job growth. The total acreage within the Urban Growth Boundary is approximately 180. Approximately 120 or 67% of the land area is currently developed.

The population of Donald is estimated by the Population Center at Portland State University. Donald's population is expected to grow by 3.2% annually until the year 2034. It is estimated that by 2034 the population of Donald will reach 2,085 people.

TABLE 28
POPULATION PROJECTIONS

Year	Projected Population
2010	979
2015	1,146
2020	1,341
2025	1,570
2030	1,838
2034	2,085

Source: Population Center, Portland State University

Implementation

The success of this program will be dependent upon the coordination and cooperation of all involved agencies and special interest groups. The following policies are intended to give guidance to the decision making bodies of the City of Donald, Marion County, and the State of Oregon.

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.
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.
3. Zoning and land uses between the city limits and the Boundary should be reviewed by the City and administered by the County.
4. Areas outside the Boundary should be maintained in a rural agricultural use.
5. Lands within the Urban Growth Boundary shall be available for urban development concurrent with the provision of key urban facilities.
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.
7. The city shall amend the Donald Urban Growth Boundary to incorporate additional residential land needed to accommodate projected housing need through 2034.

Intergovernmental Agreement

An agreement between the City of Donald and Marion County on the Urban Growth Boundary is attached (Attachment "B").

Application of Criteria

The Urban Growth Boundary was determined by applying the factors listed above. Since a good portion of the land within the City is vacant and the population projections indicate a moderate growth rate, the City of Donald chose to establish an Urban Growth Boundary that is contiguous to the city limits. One piece of property on the northwest corner was included in its entirety rather than using an undefined line along the northern edge of the property.

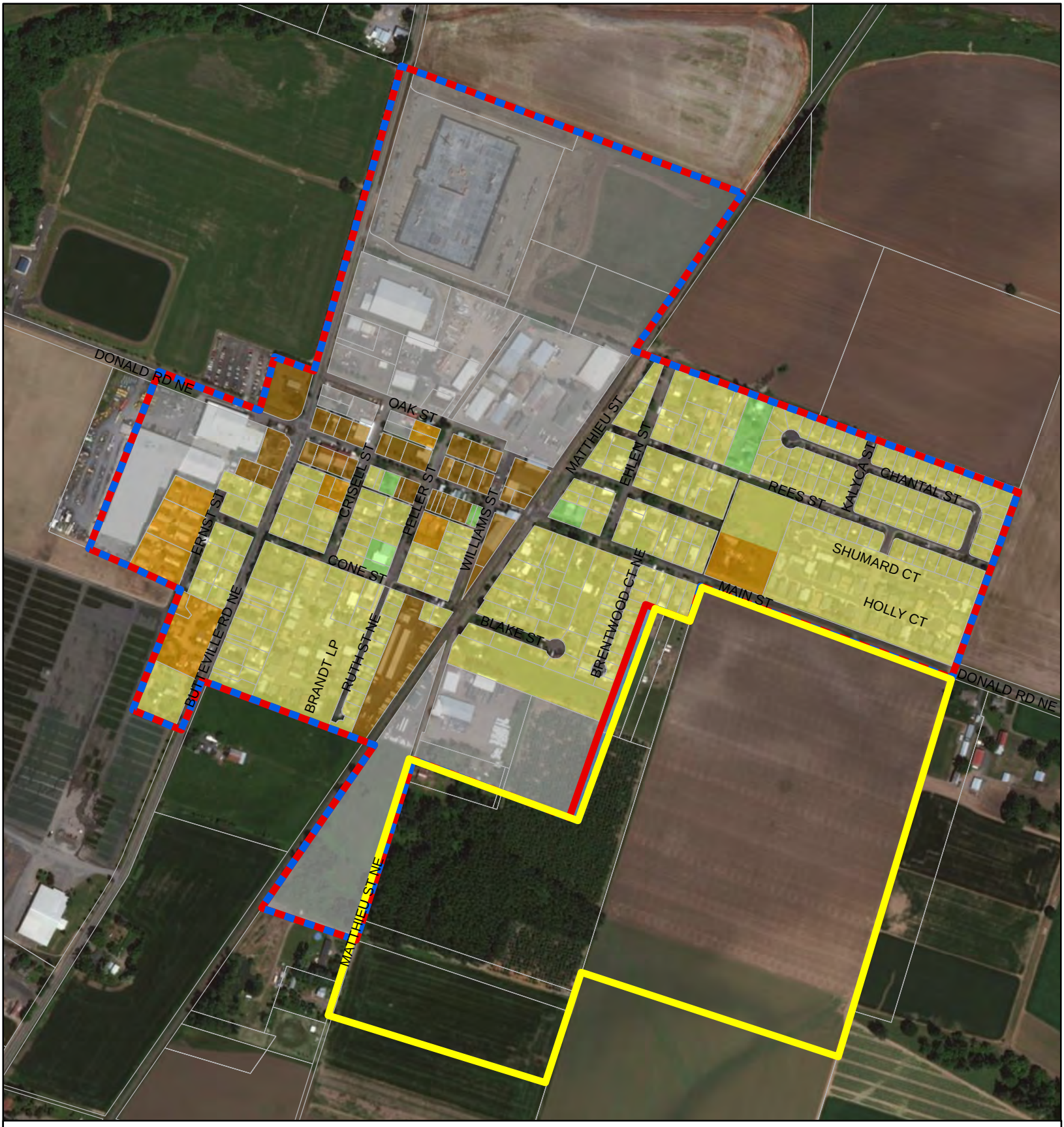
Urban Growth Boundary Expansion to Satisfy Projected Housing Need

In order to address the projected housing and residential land needs identified in Urban Growth Program Policy #7 above, the Donald City Council adopted City Ordinance No. 171-2018, approving an 87.6 acre Urban Growth Boundary Expansion which included 76.7 acres of residential land and 10.9 acres of public facility land. This 2018 Urban Growth Boundary expansion satisfied the full residential land need to accommodate Donald's projected housing need through the year 2034.

Proposed Donald UGB Expansion, 2018

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

ATT C1



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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Alternative A

ATT C2

Note: Not to scale. Areas are approximate.

Alternative B

Note: Not to scale. Areas are approximate.

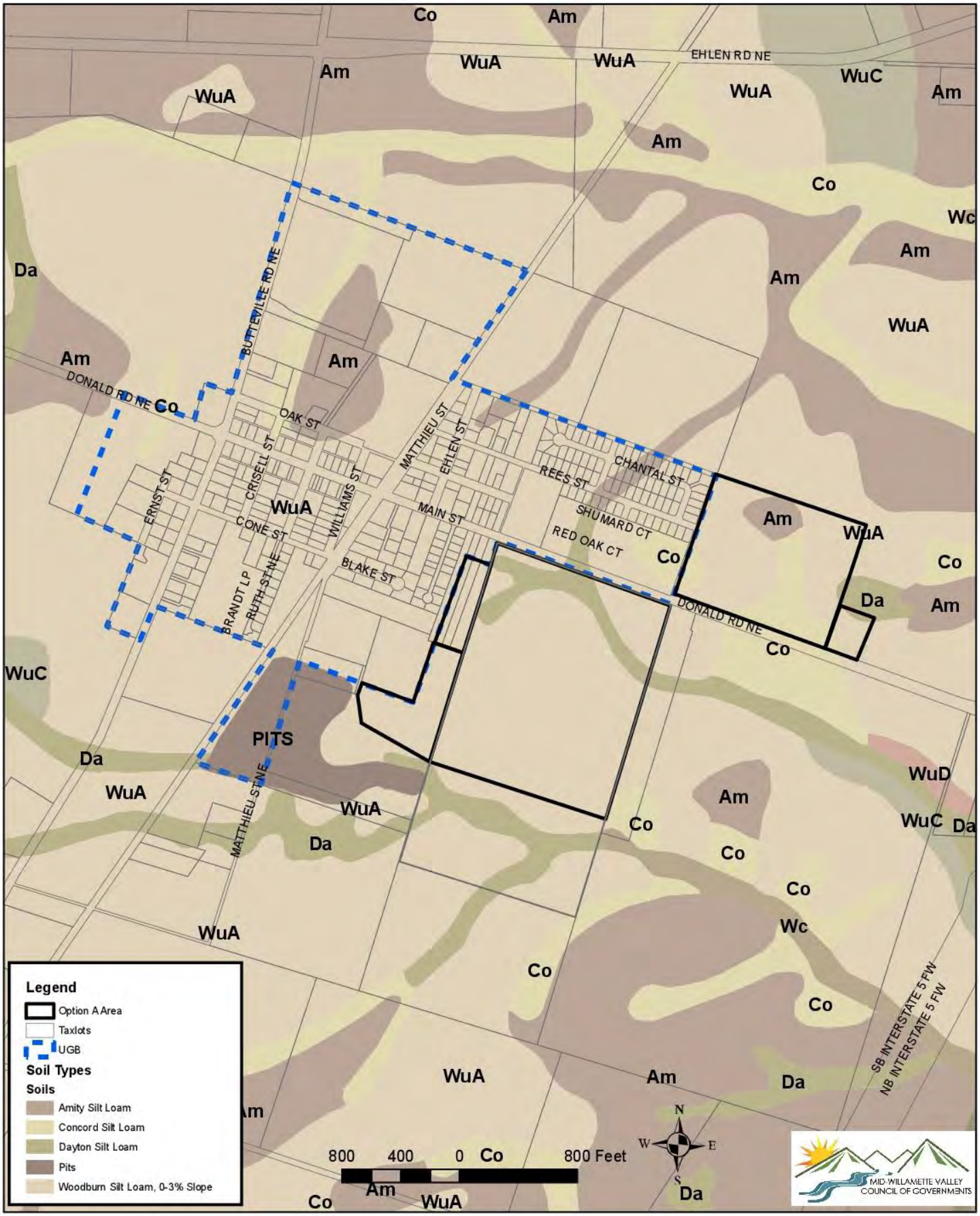
Alternative C

Note: Not to scale. Areas are approximate.

ATT C3

ALTERNATIVE A

SOILS: 86% PRIME, 14% HIGH VALUE

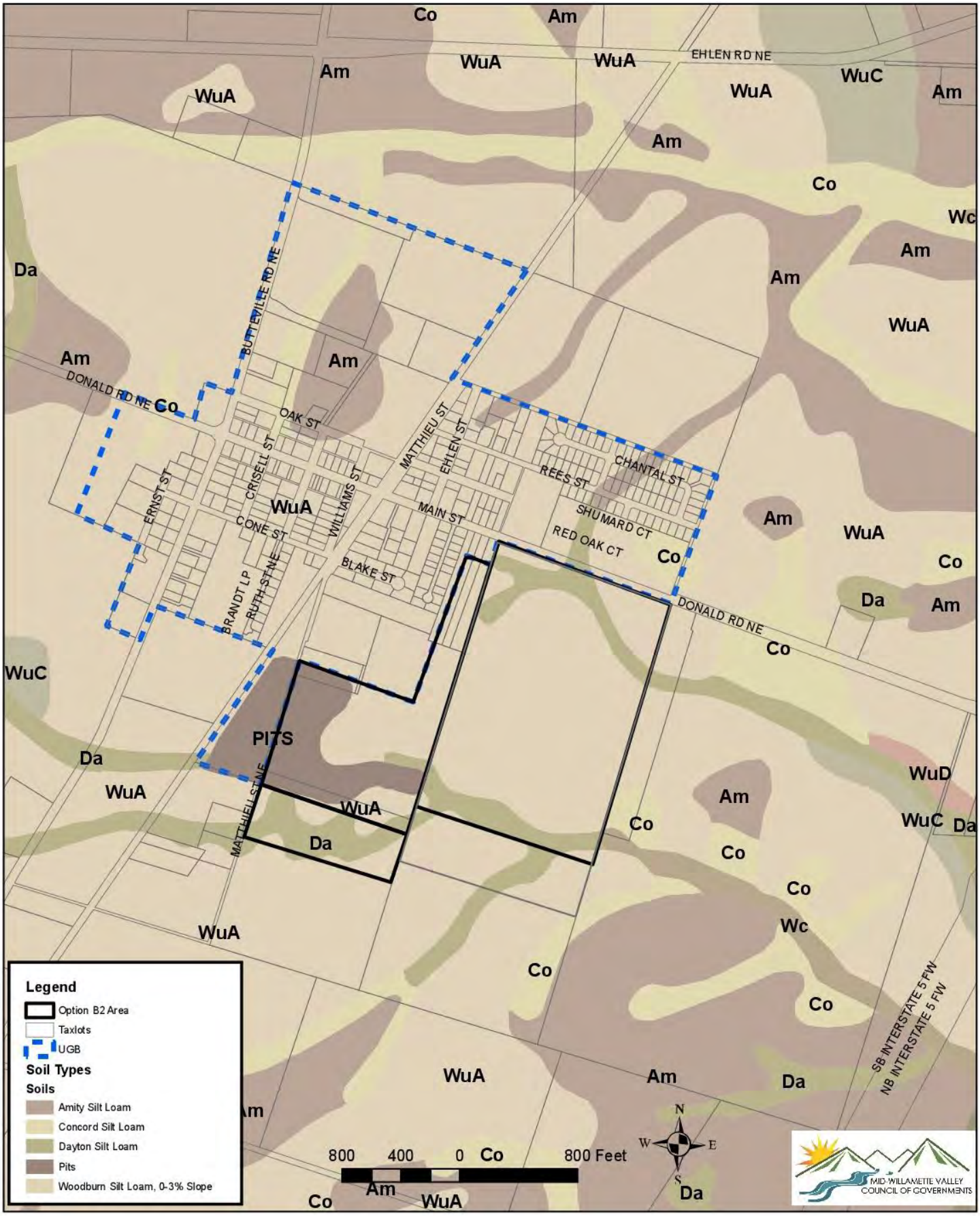


ALTERNATIVE B

SOILS: 84% PRIME, 16% HIGH VALUE

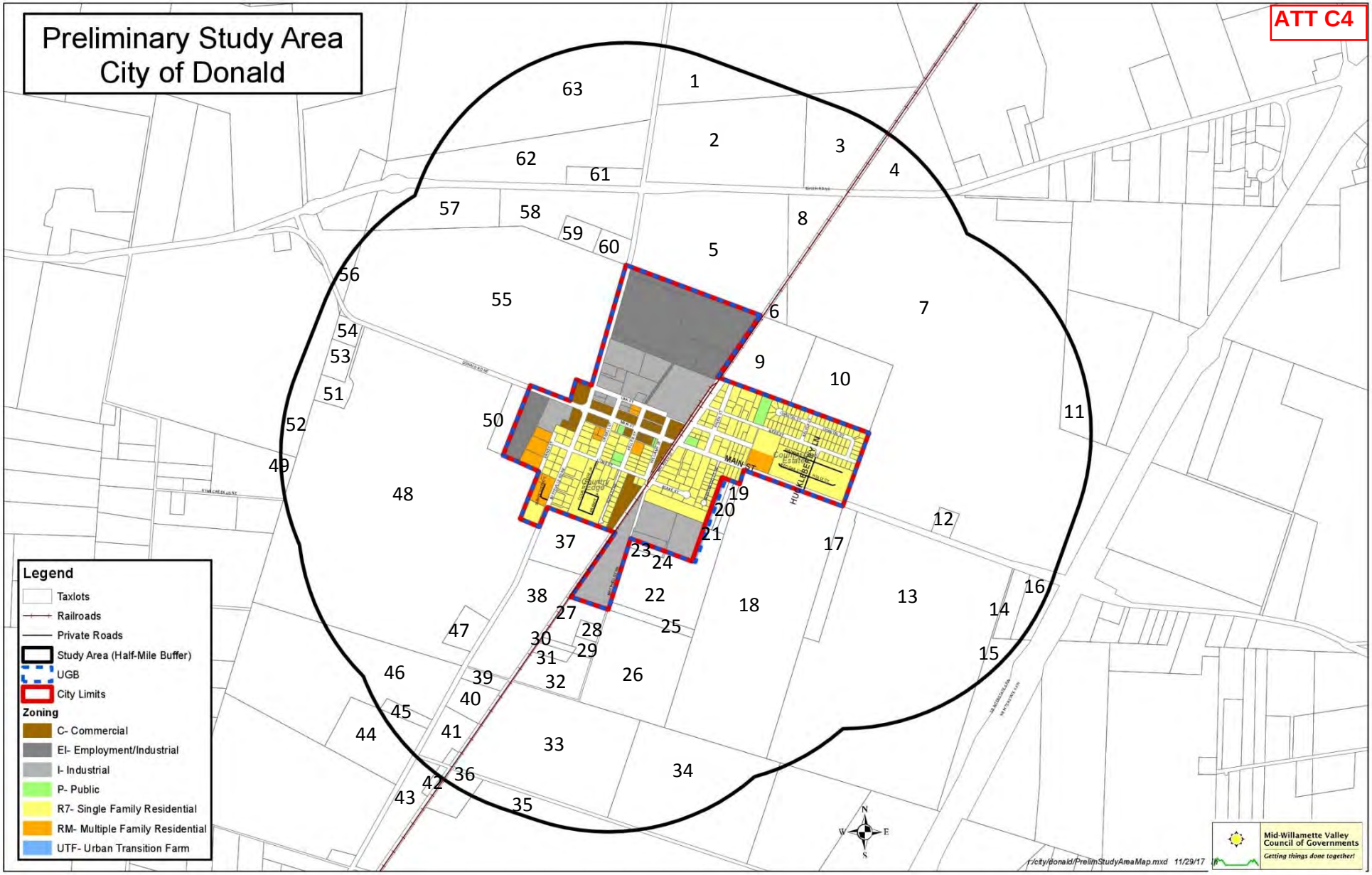
ALTERNATIVE C

SOILS: 79% PRIME, 21% HIGH VALUE



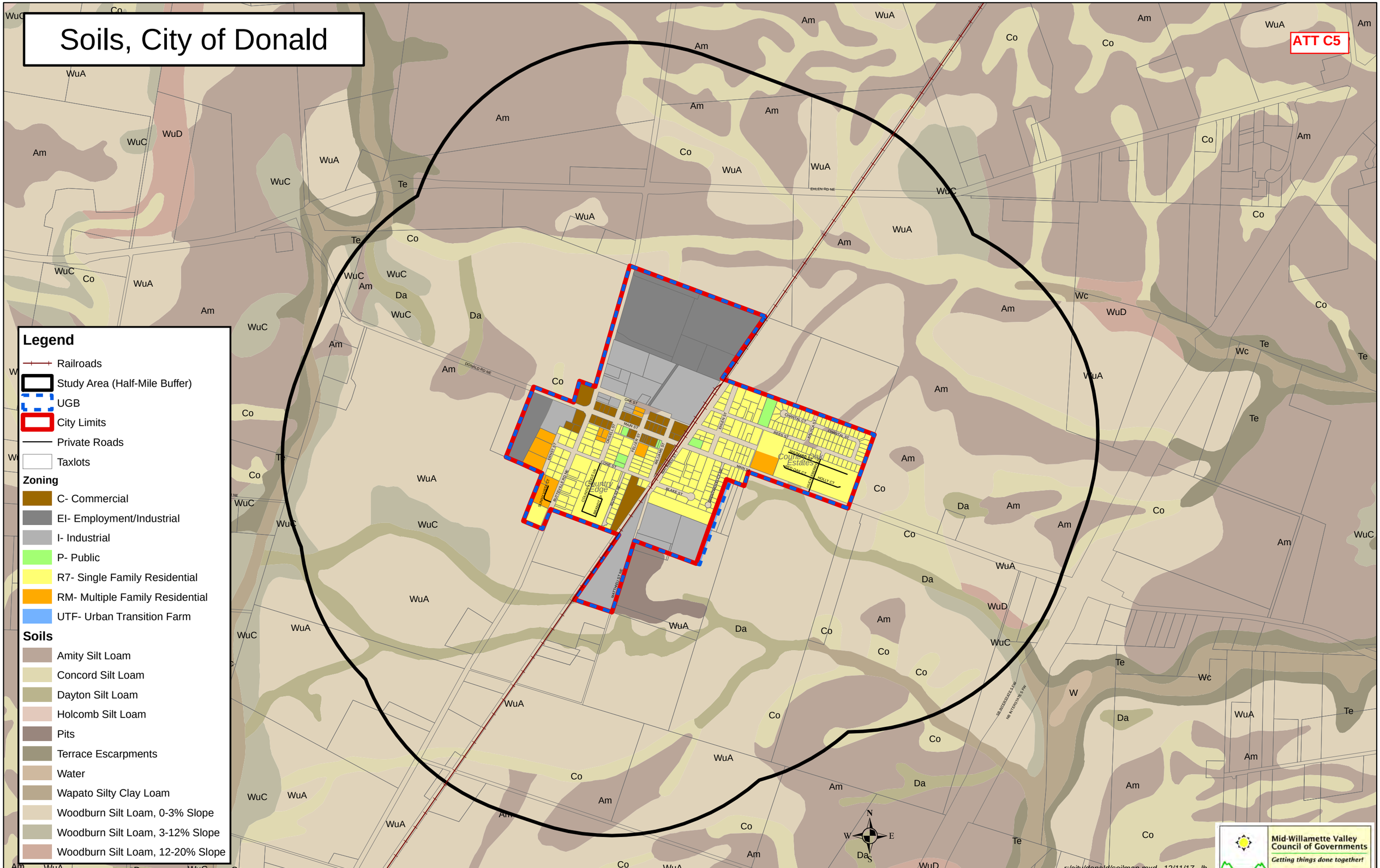
ATT C4

Preliminary Study Area
City of Donald



Soils, City of Donald

ATT C5

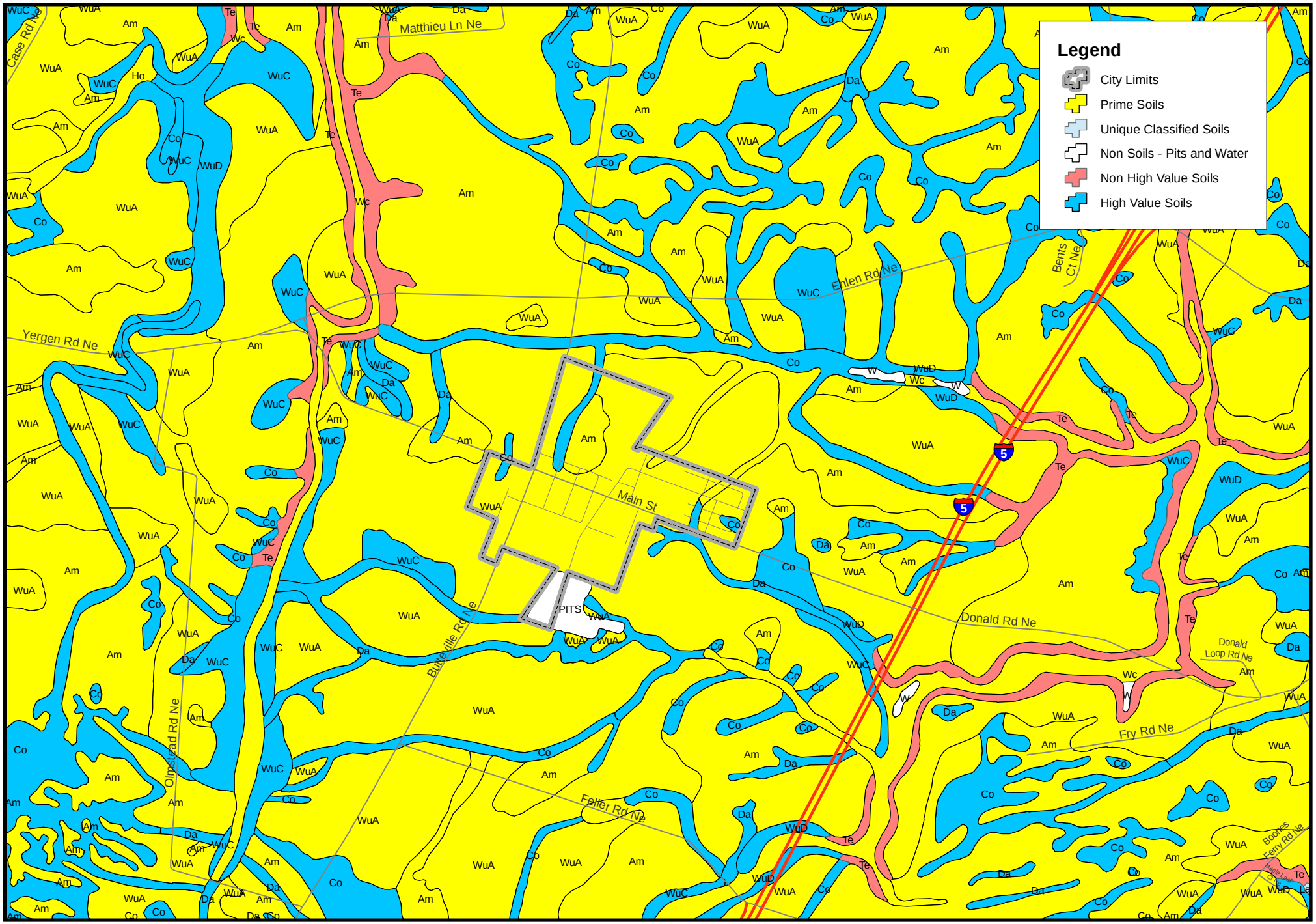


City of Donald Soils

ATT C6

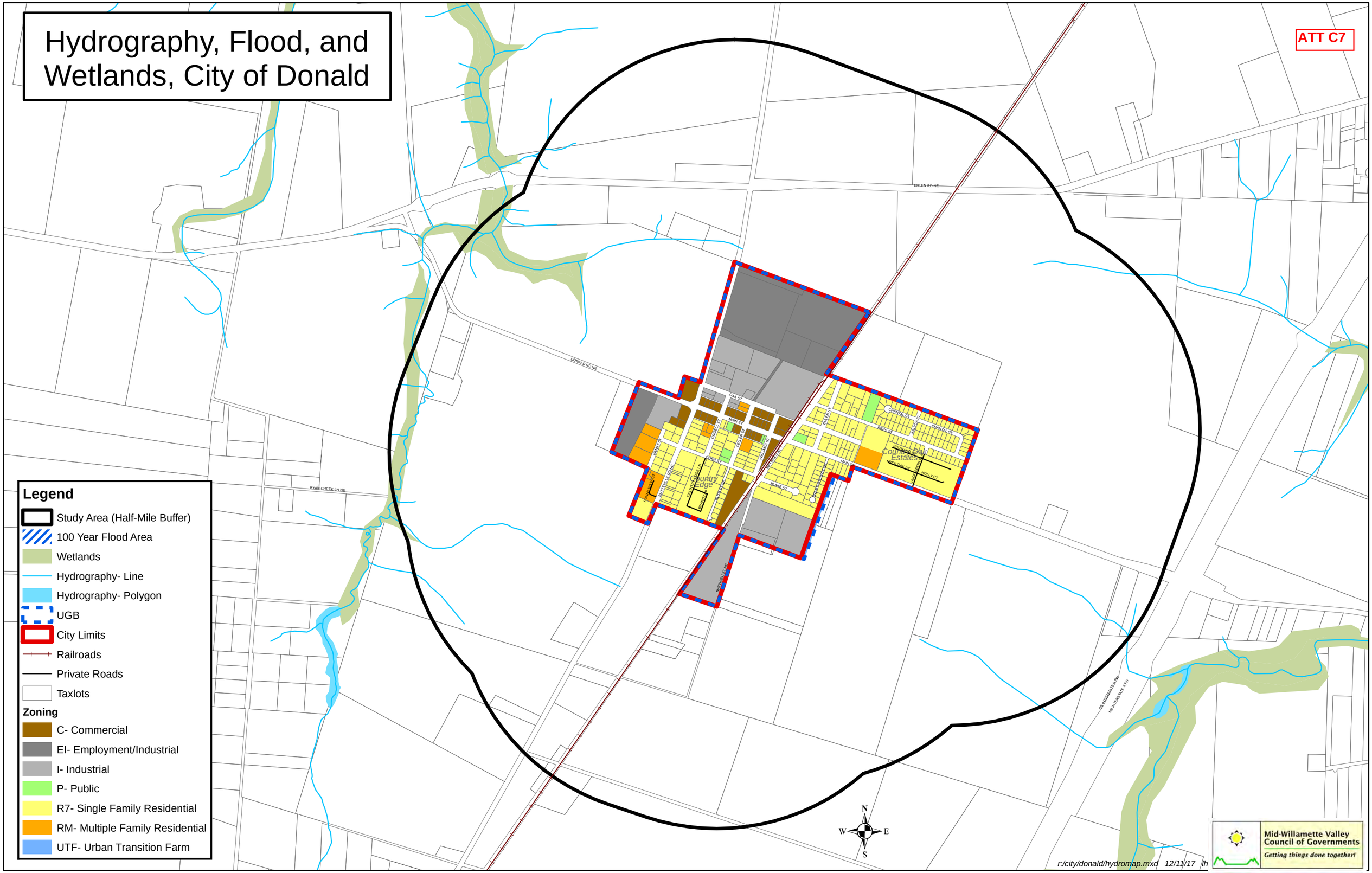
Prepared By: BPearson

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



Hydrography, Flood, and Wetlands, City of Donald

ATT C7



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

N E S W

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

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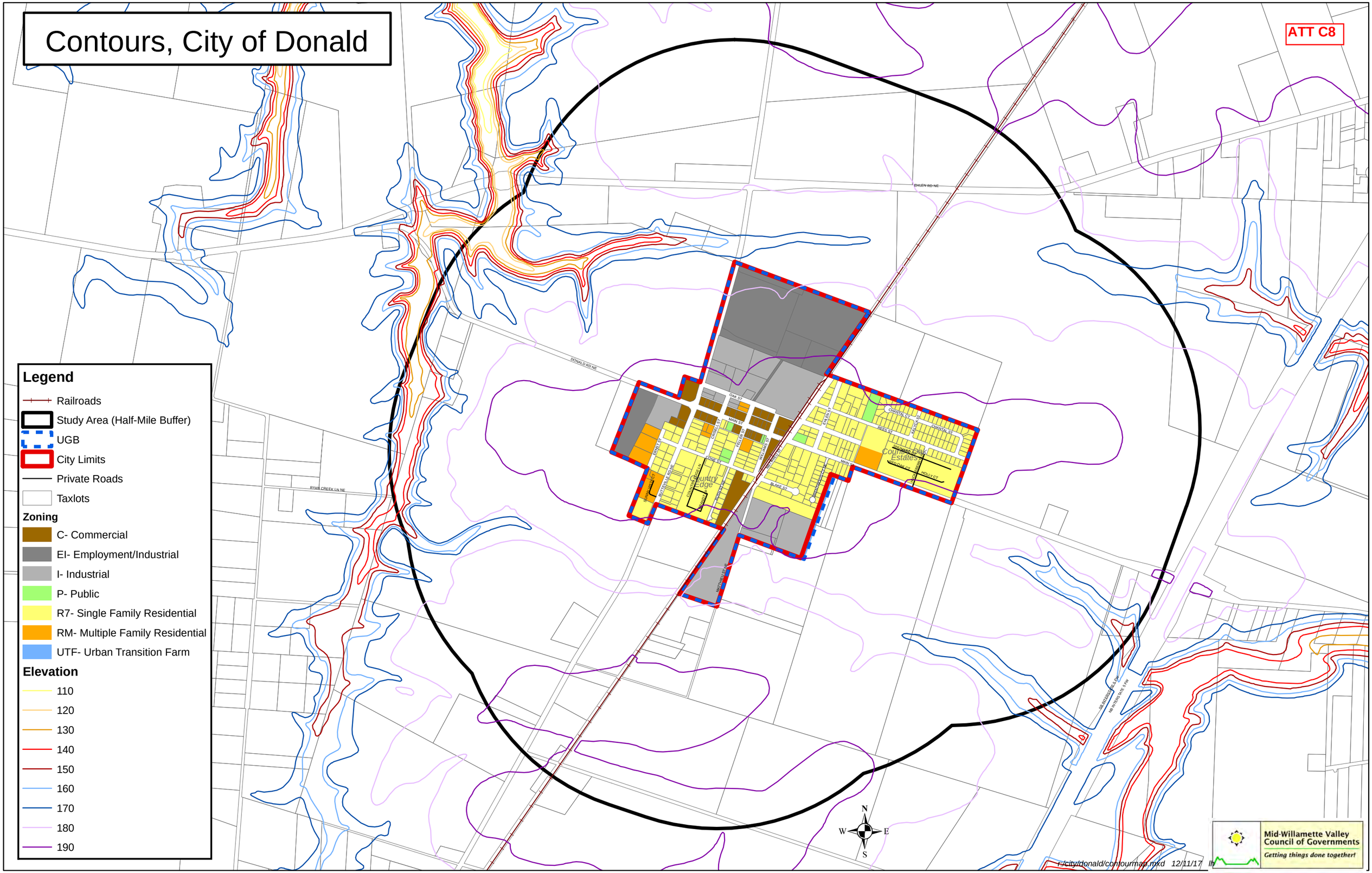
Contours, City of Donald

ATT C8



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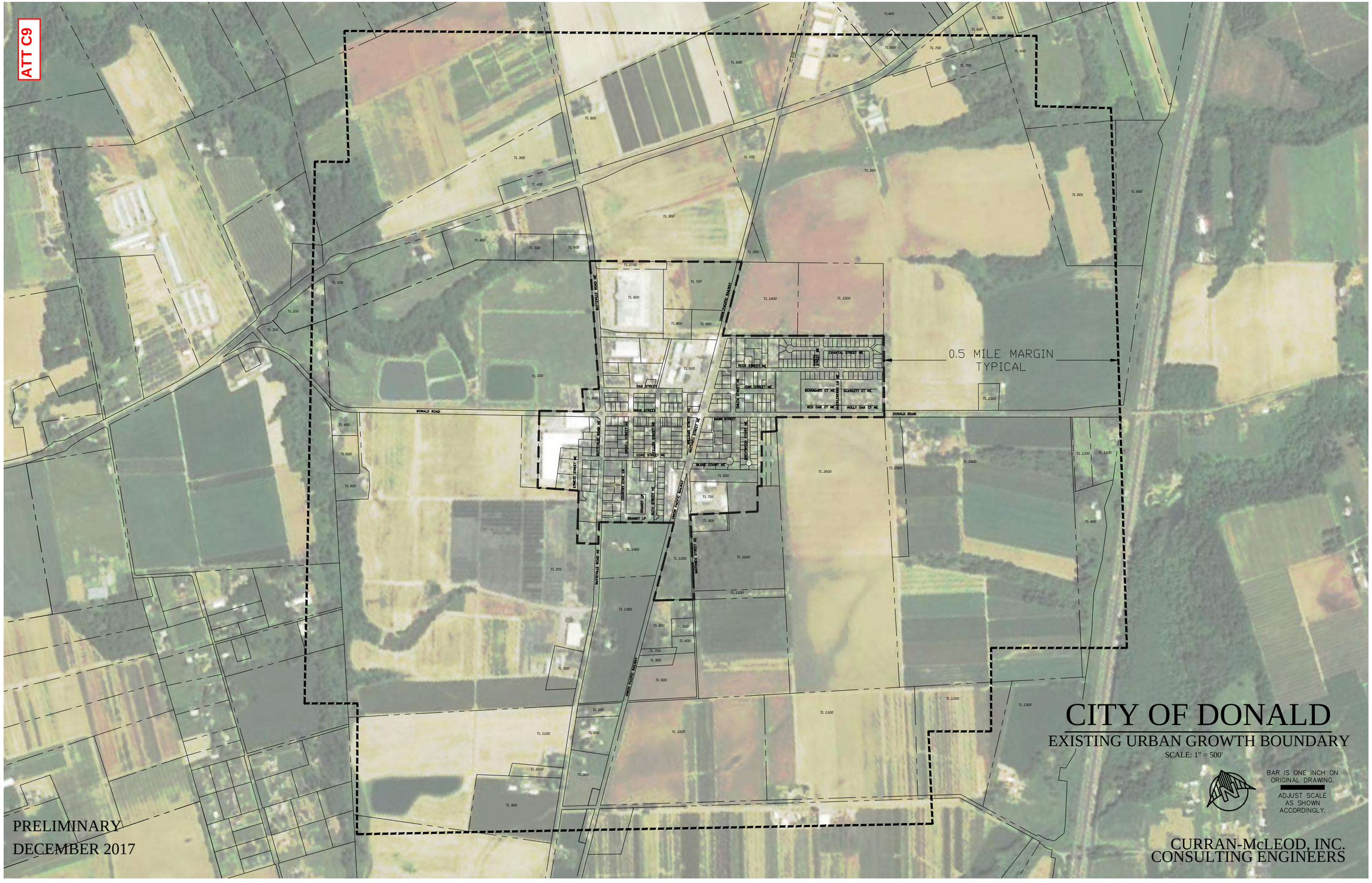

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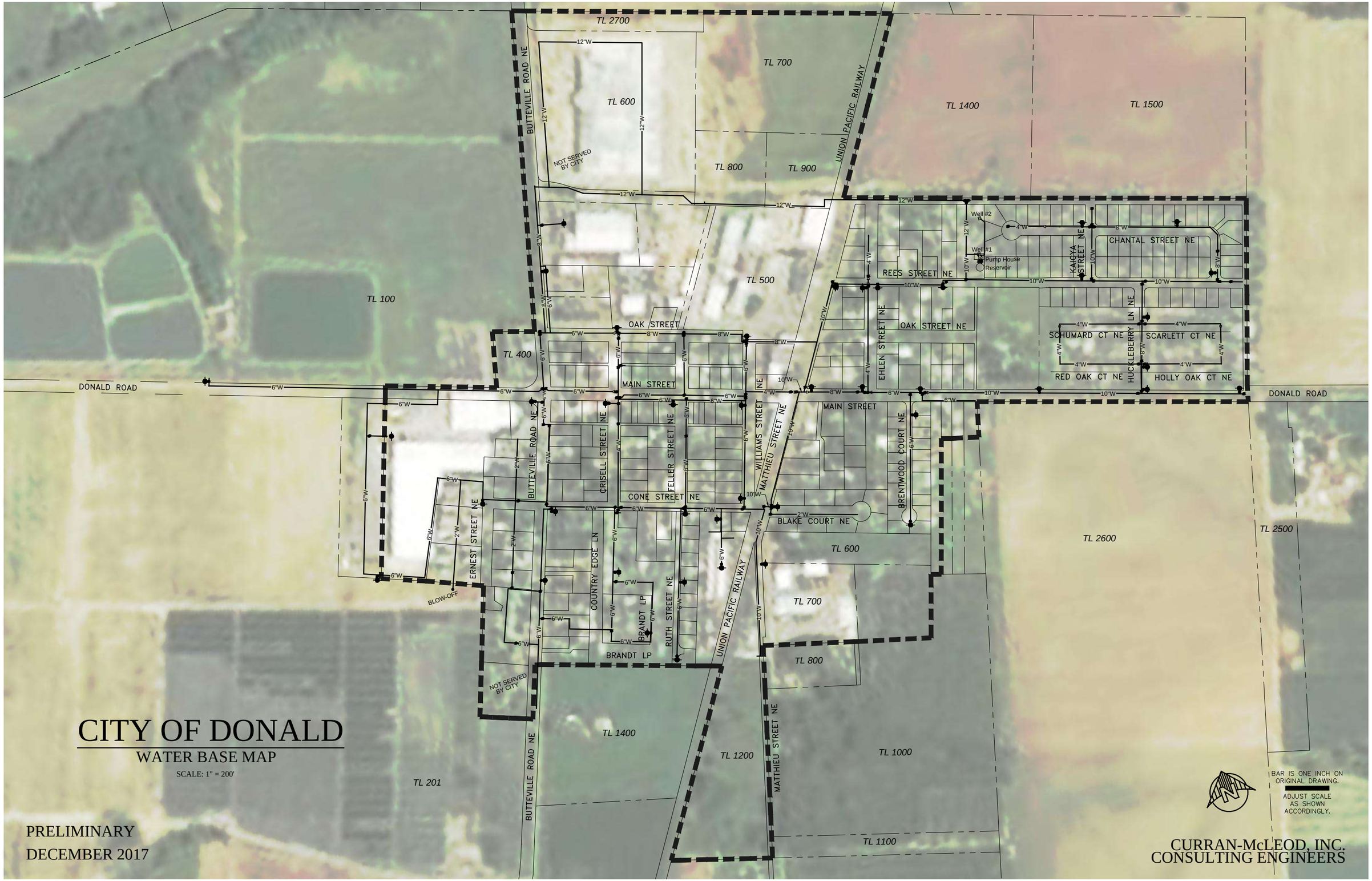

CITY OF DONALD

WATER BASE MAP

SCALE: 1" = 200'

PRELIMINARY

DECEMBER 2017

CURRAN-McLEOD, INC.
CONSULTING ENGINEERS

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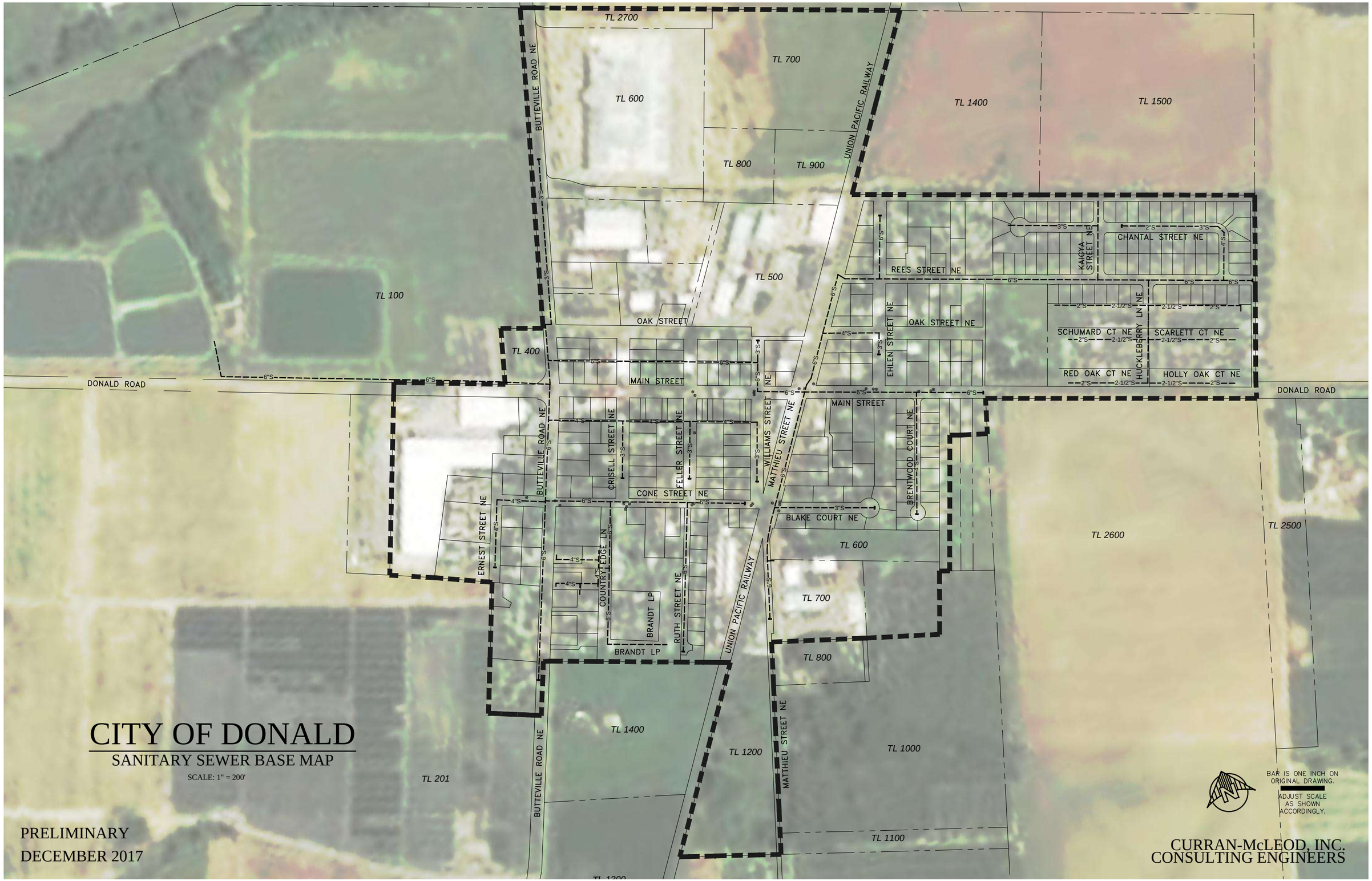

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ATT D

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 E

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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ENGINEERING

321 SW 4th Ave., Suite 400 | Portland, OR 97204 | 503.248.0313 | lancasterengineering.com

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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

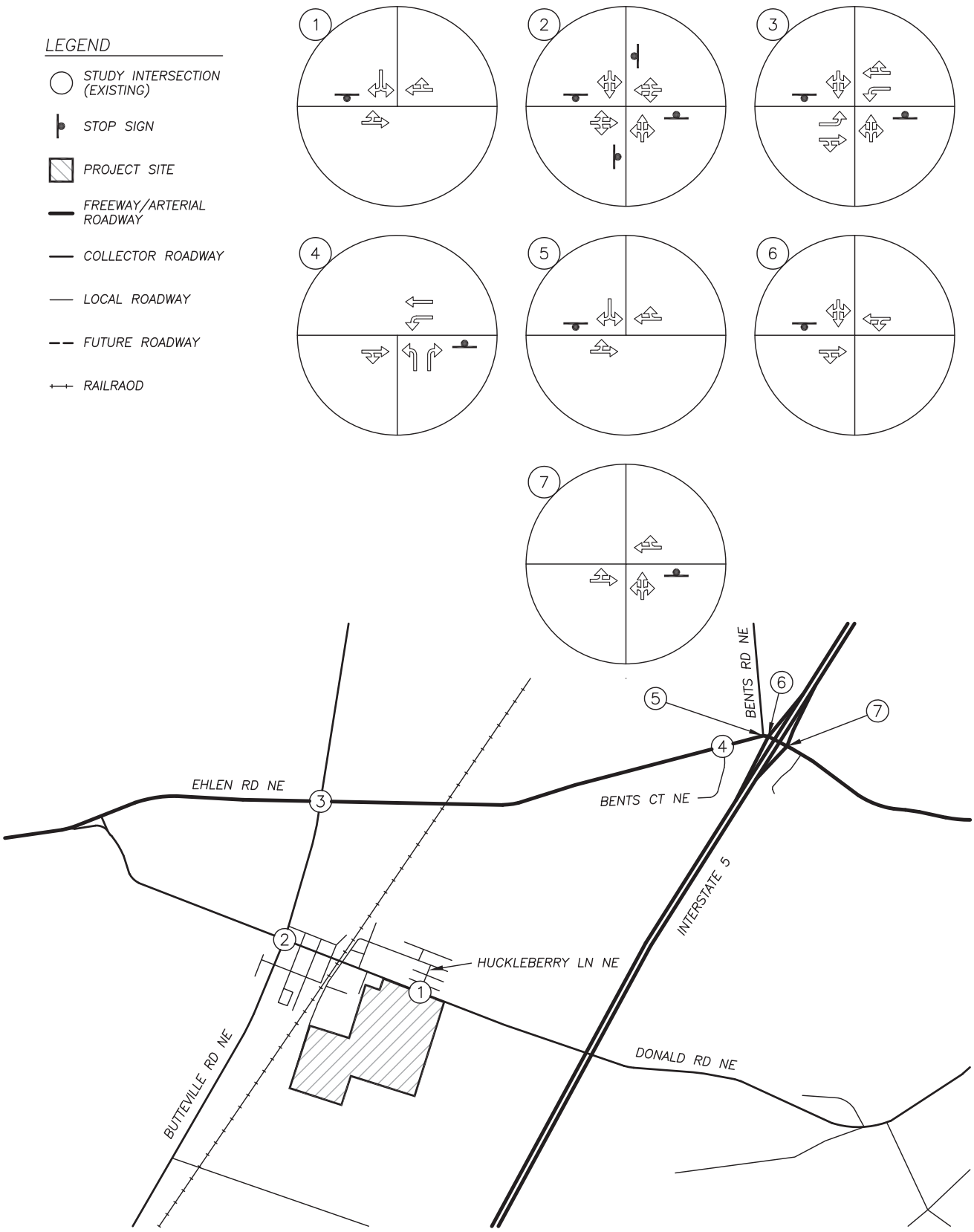
Intersection	Jurisdiction	Control Type
Donald Road NE at Huckleberry Lane NE	Marion County	Stop Control (north leg)
Butteville Road NE at Donald Road NE	Marion County	Stop Control (all legs)
Ehlen Road NE at Butteville Road NE	Marion County	Stop Control (south leg)
Ehlen Road NE at Bents Court NE	Marion 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.

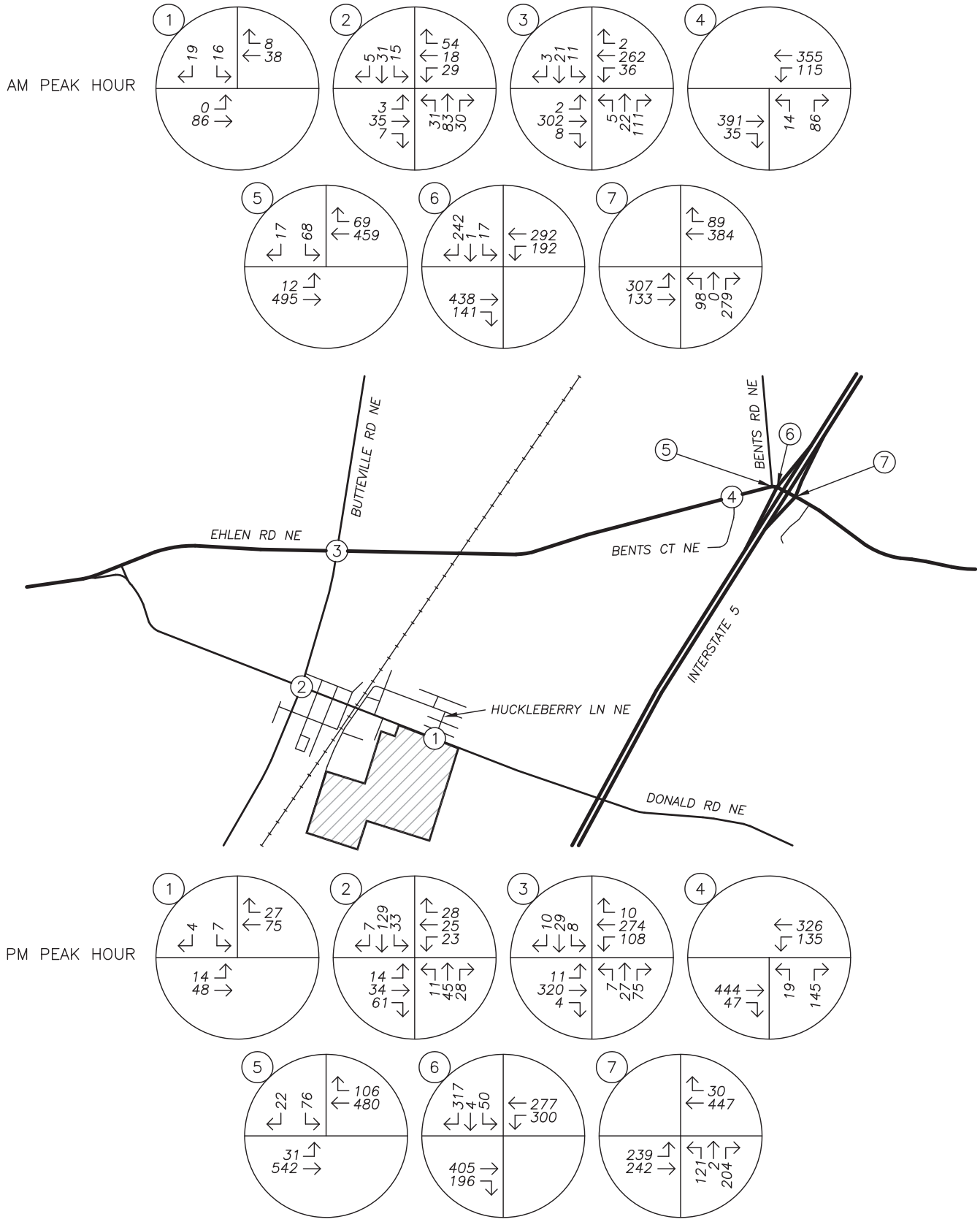
Figure 3 on page 7 shows existing morning and evening peak hour traffic volumes at each of the study intersections.



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.

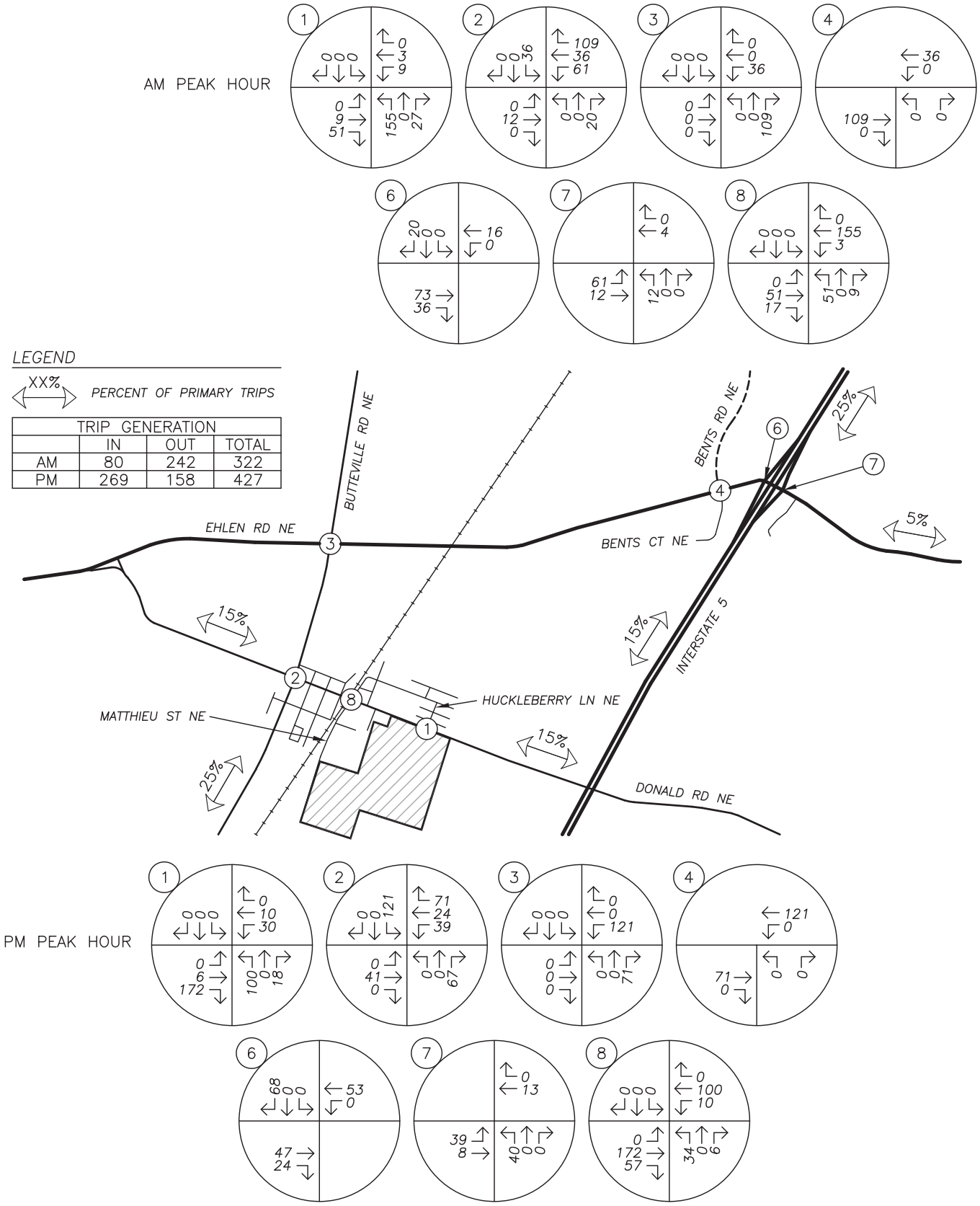
The following trip distribution was estimated and used for analysis:

- 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.



TRIP GENERATION			
	IN	OUT	TOTAL
AM	80	242	322
PM	269	158	427

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.

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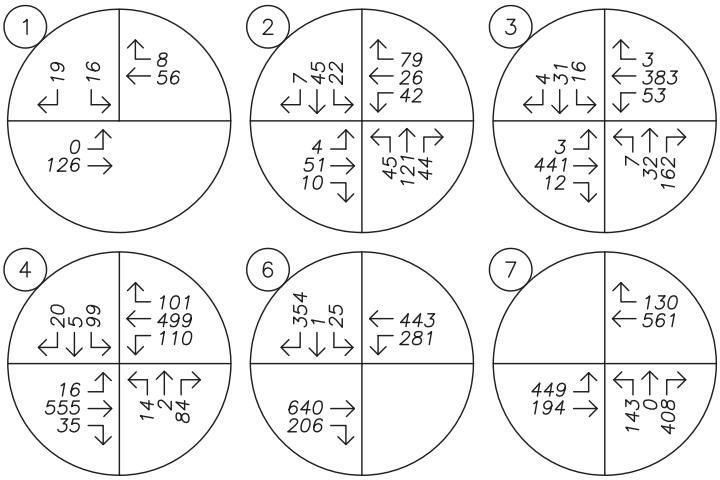
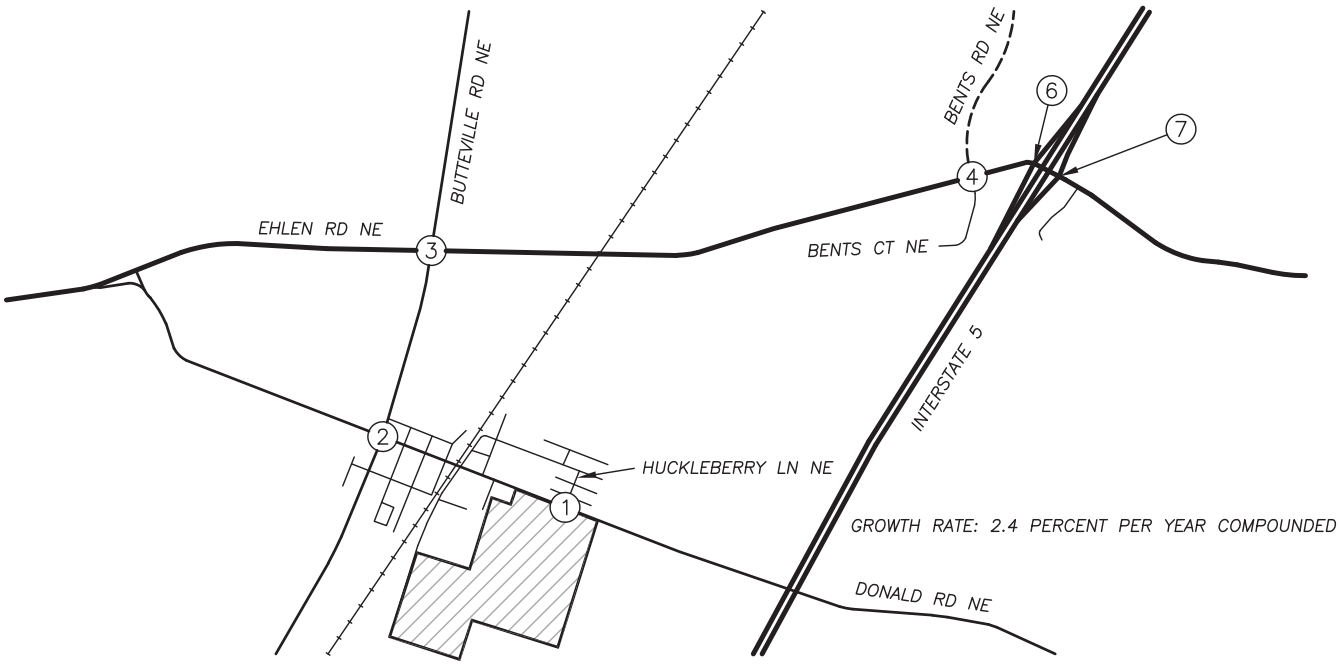
[2] Marion County, *Marion County Rural Transportation System Plan 2005 Update*, Chapter 8: Roadway System Needs and Recommended Improvements, 2005. http://www.co.marion.or.us/PW/Engineering/rtsp/Documents/chapter8roadwaysystemimprovements.pdf.

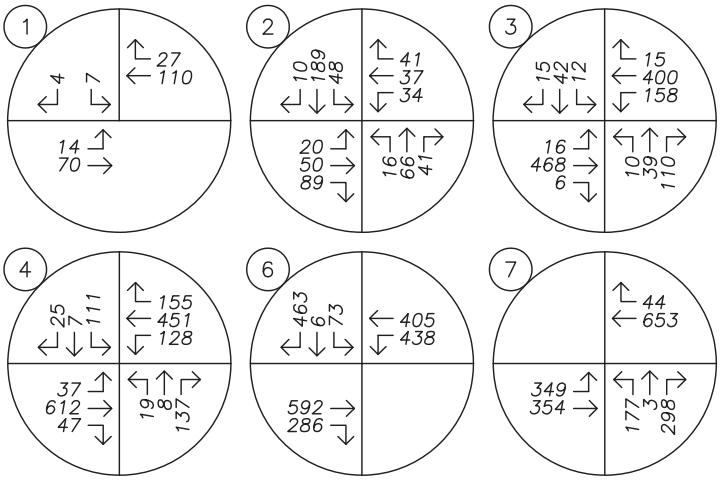
[3] ODOT, *I-5 at Aurora-Donald Interchange Project, Phase 1*, 2018. http://www.oregon.gov/odot/projects/pages/project-details.aspx?project=19062.

AM PEAK HOUR





PM PEAK HOUR

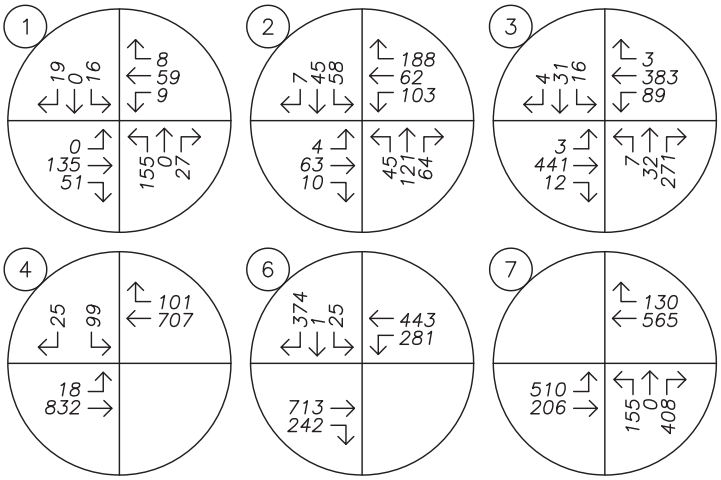


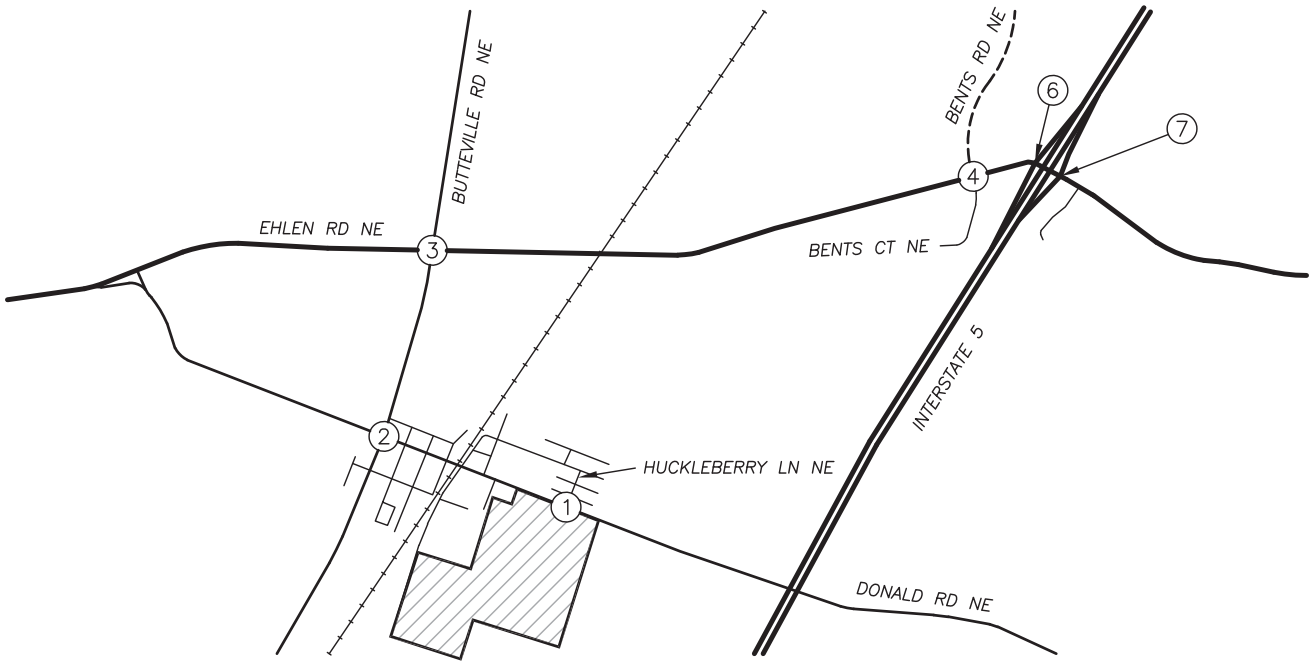
TRAFFIC VOLUMES
2034 Background Conditions
AM & PM Peak Hours

no scale

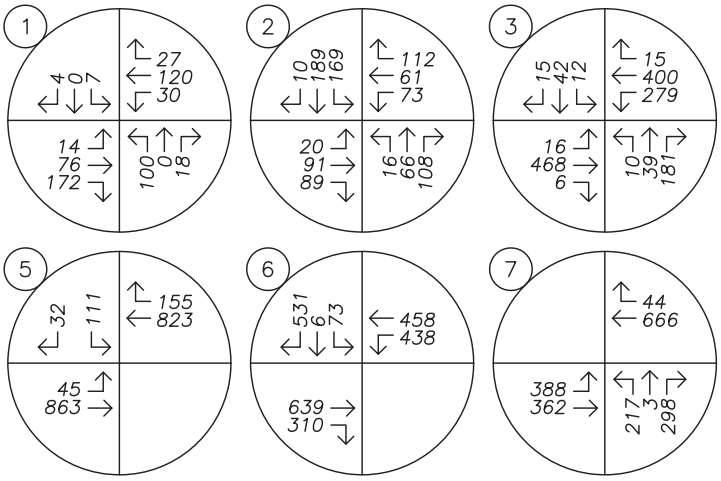
FIGURE 5

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.

ATT F

Byram, Holly

From: FRICKE Daniel L <Daniel.L.FRICKE@odot.state.or.us>
Sent: Tuesday, April 24, 2018 7:51 AM
To: 'Heidi Bell'
Cc: Byram, Holly; 'todd@lancasterengineering.com'; GARRETT Matthew L * ODOT; CHICKERING Sonny P; COLE Terry D; LABAR James * GOV
Subject: ODOT Comments on Donald UGB Expansion

Follow Up Flag: Follow up
Flag Status: Flagged

Heidi –
Thank you for providing the Oregon Department of Transportation (ODOT) with an opportunity to review the city's proposed UGB expansion and associated transportation impact analysis (TIA). ODOT staff have completed review of the TIA and, while it does contain several minor technical errors, correction of those errors would not materially alter the findings and conclusions of the study. Based on that review, ODOT has no objection or negative comments about the UGB expansion at this time.

This communication should be included in the record as ODOT testimony. ODOT should be considered a party to the hearing and be entitled to notices of future hearings, or hearing continuances or extensions. Please provide me with a copy of the City's decision, including findings and conditions of approval.

Dan Fricke, Senior Transportation Planner
Oregon Department of Transportation
Region 2
455 Airport Road SE Building B
Salem, OR 97301-5395
Ph: 503-986-2663
e-mail: daniel.l.fricke@odot.state.or.us

ATT G

FREQUENTLY ASKED QUESTIONS

DONALD UGB EXPANSION STUDY, 2017-2018

1. What is being proposed?

The City of Donald is considering an expansion of the City of Donald Urban Growth Boundary (UGB) by 87.6 acres. Of the total, 76.7 acres would be designated residential use to meet the City's 20-year land supply. The remaining 10.9 acres would be designated public, as the existing storm water detention facility already managed by the City. A map of the area is attached.

2. What is an urban growth boundary (UGB)?

The UGB is a boundary outside of the city limits. While the city limits delineate the incorporated city where utilities and services are provided and taxes are collected to fund public services, the UGB is essentially a holding zone or "waiting area" of properties available to be annexed into the city limits in the future. The UGB designates where the city will grow over the next 20 years and beyond. Annexation of properties from the UGB into the city limits is based largely upon the private sector and market demand. Annexation from the UGB into the city limits is typically initiated willingly by the private property owner/developer.

3. Why is the City considering growing its Urban Growth Boundary (UGB)?

The State of Oregon requires all incorporated cities to maintain a 20-year supply of land for residential and employment (commercial and industrial) lands within their urban growth boundary (UGB). In 2014 the City of Donald studied their land supply through processes called a Buildable Land Inventory (BLI), an Economic Opportunities Analysis (EOA), and a Housing Needs Analysis (HNA). These studies determined that the city had sufficient commercial and industrial land to meet the forecasted 20-year demand, but there was a deficit of 76.7 acres of residential lands, after taking into consideration all of the vacant and re-developable land within the current UGB. This determination was adopted into the City's Comprehensive Plan in 2015. The "Urbanization" chapter of the Donald Comprehensive Plan includes a policy which states: *"The City shall amend the Donald Urban Growth Boundary to incorporate additional residential land needed to accommodate projected housing need through 2034."*
In order to follow through with this City policy, in April of 2017 the City Council voted to initiate an Urban Growth Boundary Expansion Study, and received Marion County grant funding to do so.

4. How much will Donald grow in the next 20 years?

The current population of Donald is 985 people. The population of Donald in the year 2034 is forecasted to be 2,085 people. As the population grows, approximately 465 more housing units will be needed in the community. This equates to 76.7 acres of land. As this is a 20-year timeline, growth and development will likely occur slowly.

5. So how do you decide which land to bring into the UGB?

The State of Oregon has strict rules about how a city can amend its UGB. They are detailed in the Oregon Administrative Rules (OARs) Chapter 660, Division 24. Essentially a ½ mile buffer is drawn around the city's current UGB to establish a "Preliminary Study Area." Then land is filtered out based upon a lot of different factors, including but not limited to: soil type, steep slopes, natural hazards, sensitive habitat areas, cultural resources, the city's ability to serve infrastructure, the cost to build the infrastructure, traffic impacts, etc. A technical advisory committee (TAC)

including representatives from several agencies and diverse viewpoints served to guide the study process. Three alternatives scenarios were mapped out as A, B, and C. These were presented to the public in the Open House in Donald on February 26th, and available on the City's project website. The preferred alternative, Alternative C, was selected because by the Oregon Administrative Rules (OAR), the City must select the alternative which includes the least amount of prime agricultural soils (class I and II soils). A state agency called the Department of Land Conservation and Development (DLCD) carefully reviews the entire process. Many other local, state, and federal agencies, utility companies, services providers, special districts, rail, and land-use watchdog groups are consulted along the way.

6. What public hearings will be held?

There will be public hearings before the Donald City Planning Commission on April 26th, the Donald City Council on May 8th, and Marion County Commissioners in July or August (TBD).

7. What if a property owner doesn't want to be in the UGB?

All property owners within the study area were surveyed to ask their interest in being included. All the property owners affected by the proposed expansion area were willing.

8. I live along Main Street in the City of Donald. Will the UGB project make me put in sidewalks?

No, the UGB project will not. Sidewalks in front of a property are required at the time of development (partitions, subdivisions, etc.), to be paid for by the developer. In an unrelated project, the City Council is considering a downtown sidewalk improvement project on both sides of Main Street, from Butteville Rd. NE to the railroad tracks, in summer of 2019. This project would likely be a Local Improvement District (LID), which requires property owners to pay for the portion of sidewalk only in front of their property. It is typically applied as a lien on a property, so that property owners aren't required to pay immediately out of pocket. If not paid sooner, it would be collected the next time the property is sold. The City has received an ADA grant for accessibility ramps on the corners, to offset the cost to local property owners. There is a possibility that the City may consider extending the sidewalk project from the railroad tracks east in the future, but there is no plan in place at this time. Property owners will be notified of the Local Improvement District work and invited to the City Council meeting that the project will be discussed.

9. Is it possible that there are houses within the city limits that are on septic systems?

Yes. The City of Donald's system is called a STEP system, and there are no plans to change this system. The septic tanks are a critical part of the City's sewer system. In Donald every house has a septic tank. The septic tanks retain the solids, and the liquid travels through City pipes to the lagoons and then irrigation land. The City is responsible for pumping every tank. There is a lot of good information on STEP systems on the City's website on the Water/Sewer tab or occasionally in the monthly newsletter that comes with your water and sewer bill. Houses in the incorporated city limits are required to hook up to city water and sewer systems.

10. I live in the city limits. Will the UGB expansion cause my property taxes to go up?

No. Your assessed value is determined by the Marion County Assessor. Your property tax bill is tied to a) the assessed value on your property, and b) the tax rates applied to that property by the taxing jurisdictions such as school districts, park districts, county, and city. The assessed value of your home is also tied to the local, regional, state, and national economy. The City of Donald's permanent tax rate is $0.87/$1,000 assessed value. This amount was fixed by

the passage of Measure 50 in 1997, which also limits the annual growth in assessed value to three percent (3%). The UGB expansion itself should have no impacts upon properties currently within city limits.

11. Is it true that the Flying J development (Fargo Interchange) pumps to the City lagoons?
The Interchange area has its own lagoon that the City maintains at the City lagoon property and this relationship is managed by a contract.

12. Is it true that the City water and sewer systems are at capacity?
The city's engineer is currently updating master plans for water and sewer with a $40,000 in grant from the State to pay for these master plan updates. The plans should be done this summer. They will tell the city exactly what the next steps are to meet the future capacity of the city. These plans will determine if a new lagoon is needed whether or not the UGB expansion is approved because the lagoons are near capacity and there is still undeveloped land within the city (residential, commercial, and industrial).

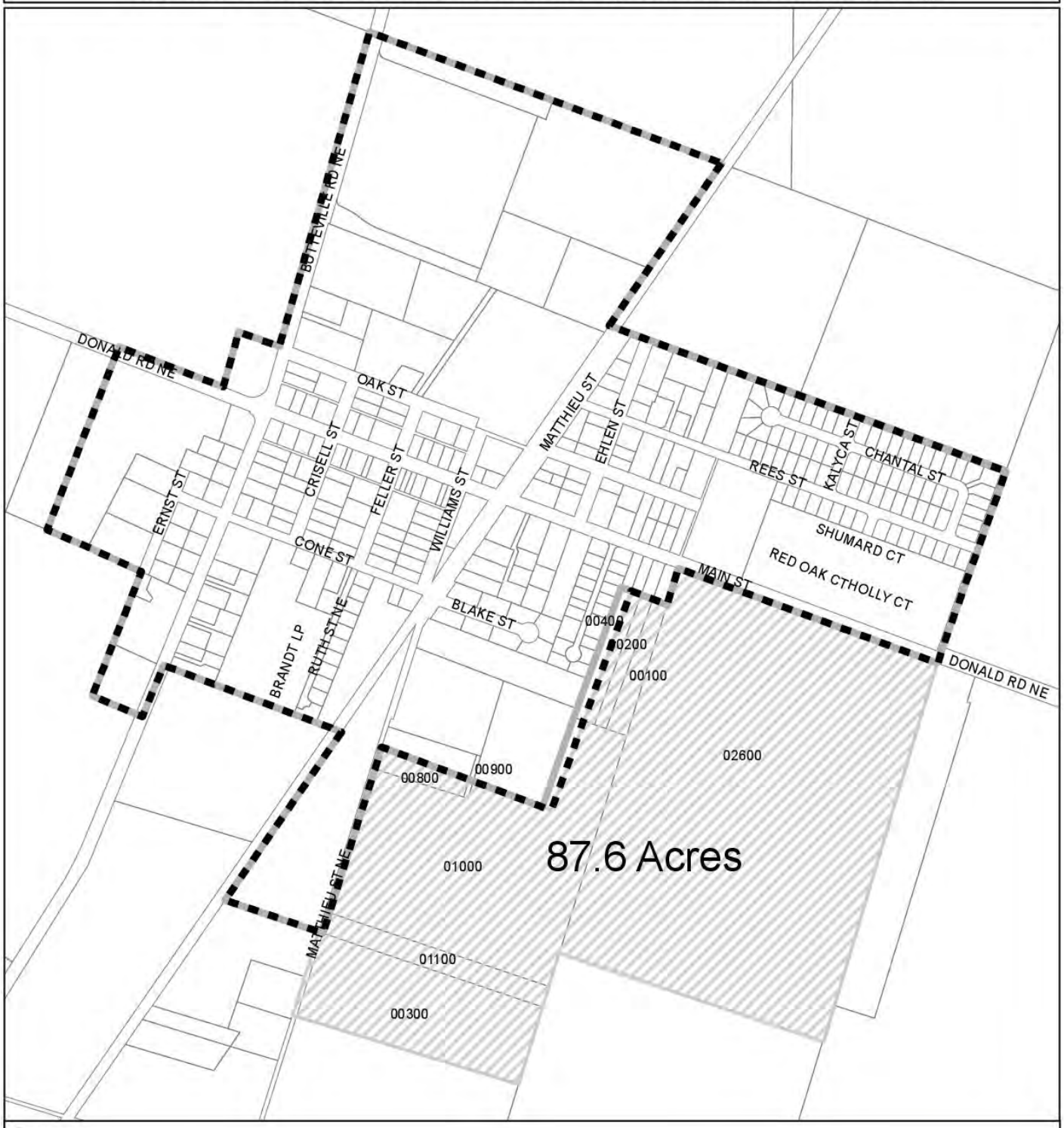
13. Related to the new lagoon and other potential upgrades, will the current residents have to pay for any of this?
New development is required to pay system development charges (SDCs) which help fund public infrastructure expansions needed for future development. SDCs are expended by the City's Capital Improvement Plan, which is available on the City's website. New development is also responsible for all costs associated with tying into an existing system – such as costs of lines, pump stations, etc.

14. The traffic is already bad at some intersections, will the UGB expansion make it worse?
The City hired a traffic engineer to study seven (7) critical intersections between the proposed UGB expansion area and I-5 on ramps. Their report is called a Transportation Impact Analysis (TIA), and it forecasts the level of service (how congested) each of these intersections will be by the year 2034, with and without the proposed UGB expansion. In some cases the intersections will necessitate improvements, and some of the improvements are already in the Marion County Rural Traffic System Plan (TSP) or in planning phase within the ODOT Interchange Area Management Plan (IAMP). One example is that the intersection of Butteville Rd. NE and Ehlen Rd. NE will need either a traffic light or a roundabout by the year 2034, whether or not the UGB expansion occurs. This is already within the County's plan. Based upon whether the intersections are in City, County, or State jurisdictions, future developers of the expanded UGB would pay either system development charges (SDCs) and/or proportional shares of the improvements, based upon the number of trips generated. The trigger for additional study and assessment will be upon future applications for annexation and development approvals.

15. Some people are concerned because they want Donald to stay a small town, with no growth.
The state of Oregon requires incorporated cities to provide a 20-year land supply to meet forecasted demands for housing and employment development. The most recent study (adopted in 2015) determined that Donald is not currently in compliance with that state rule, and needs to grow its UGB in order to provide housing for Oregonians. The projected population for the year 2034 in Donald is 2,085 residents. Development of the UGB expansion area would not happen overnight. There are many steps that need to occur between the UGB expansion and breaking ground to build new homes. The property owners themselves will determine when they choose to annex into the city and propose development. Developers will pay the bill for annexation applications, land use applications, connections to utilities, new public improvements, SDCs, proportional shares of County transportation facilities, new open space / parks, etc.

Donald UGB Expansion, 2018

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



Legend

- UGB
- City Limits
- Proposed Expansion Area
- Taxlots

800 400 0 800 Feet

N W E S

MID-WILLAMETTE VALLEY COUNCIL OF GOVERNMENTS

r:/city/donald/UGBExpansionStudy2018/ProposedUGBExpMap_BW.mxd lh 5/2018