



**DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT**

**DEVELOPMENT SERVICES BUILDING**

150 BEAVERCREEK ROAD | OREGON CITY, OR 97045

**MEMORANDUM**

TO: Laura Terway, City of Oregon City, Planning Division  
FROM: Kenneth Kent, Clackamas County, Land Use Review Coordinator  
Rick Nys, PE, PTOE, Traffic Engineer

DATE: October 8, 2015  
RE: ZC 15-03, PZ 15-01  
32E04C 700, 702, 900, 1201, 1300, 1400, 1500, 1600 and  
32E04CD 3300, 5900 and 6000

This office has the following comments pertaining to this proposal:

1. The project site abuts Beavercreek Road and Maple Lane Court, which are both roadways under the jurisdiction of Clackamas County. As proposed, the comprehensive plan amendment/zone change includes a trip cap that will limit vehicle trips to a level that will not exceed that allowed under current zoning. At the time a development application is proposed for the project site, the county will evaluate specific traffic impacts and road frontage improvements.
2. Clackamas County has reviewed the July 22, 2015 and August 28, 2015 letters from Lancaster Engineering that provide an evaluation of the Transportation Planning Rule as it relates to this proposed comprehensive plan amendment/zone change. County staff has noted two minor issues with the letters.
  - a. The trip generation estimates relies upon an “accessory dwelling unit” land use. The ITE *Trip Generation Manual* provides no estimate for accessory dwelling units, so it is not clear what this trip generation is based upon. Additional information should be provided to ensure that this trip generation estimate is reliable as 107 units of the “Apartments” land use generates quite a few more trips than does 107 units of accessory dwelling units.

- b. The trip generation estimate relies upon the “average rate” in determining the trip generation for the project when, in some cases, the “fitted curve equation” would result in more appropriate trip generation estimates according to the ITE *Trip Generation Handbook*. In the case of this application, using the fitted curve equation would result in more trips, thereby increasing the trip cap. In order to meet Section 295.14 of the Clackamas County *Roadway Standards*, the appropriate trip generation calculation should be utilized.