

January 7, 2019

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**VIA E-MAIL**

Mayor Dan Holladay  
City of Oregon City City Commission  
Oregon City City Hall  
625 Center Street  
Oregon City, OR 97045

RE: Request that Oregon City City Commission Comment on the Application by the Oregon City School District to Expand the Portland Metropolitan Area Urban Growth Boundary to Include Property for a New Middle School

Dear Mayor Holladay and Members of the Oregon City City Commission:

This office represents the Oregon City School District (the "School District"). The School District has an option to purchase property (the "Property") owned by the Serres family containing about 32 acres (**Exhibit 1**). The Property is located on Forsythe Road just north of Holcomb Elementary School. The Property is located adjacent to the City of Oregon City's (the "City") boundary and is in unincorporated Clackamas County.

This letter asks that the City Commission acknowledge that the School District is pursuing a UGB amendment that will be reviewed by Metro. The School District is not asking the City Commission to give any approvals for future land use applications or to evaluate or commit to extend or provide City services to the Property. The School District will provide the City with the complete application package for its review and additional comment prior to submittal of the Major UGB Amendment application to Metro on March 15, 2019. The application will demonstrate (as the School District now believes) that City services are either available to serve the middle school on the Property, or can be made available by the School District at the time of development of the new middle school.

The Metro Code allows an amendment to the Urban Growth Boundary (the "UGB") for certain public purposes, including schools. This type of UGB amendment requires that the applicant include a written statement from the City and the County as to their position on the UGB amendment. The School District will ask Clackamas County for a similar statement following the City Commission's action.

The remainder of this letter answers questions that the City Commission may ask in considering this request.

**1. Why is the School District making this request now?**

The School District is planning for its long-term needs, including a new middle school on the Property. The School District plans to relocate Ogden Middle School to the Property because the current Ogden Middle School does not meet the School District's preliminary educational specifications for middle schools. Given the complexities of planning for, financing and developing a middle school, the School District determined that it needed to begin the process now. After examining its needs and reviewing properties available both inside and outside the City, the School District approached the Serres family about purchasing the Property.

**Exhibit 1** shows that the Property is adjacent to Holcomb Elementary School and the City boundary. If the UGB amendment is approved, the School District will ask the City to annex the Property and will then submit several land use applications in order to construct the new middle school.

The School District considered whether it could construct the school on the Property outside of the UGB and the City. The principal reason that it cannot do so is that the City Charter does not allow the extension of City services outside of City limits. The new middle school will require water service and sanitary sewer service (it is not possible to construct the school with a septic system) and the Metro Code prohibits annexation of properties outside of the UGB. In order to further consider the Property for development as a middle school, the Property must be within the UGB and eventually inside the City. However, the only request currently before the City Commission is the School District's request for the City Commission to comment on the UGB Amendment.

**2. Why was the Serres property chosen?**

The School District chose the Property for a number of reasons. First, the Property is flat enough to allow school and recreational facilities development. Second, the Property is large enough (about 32 acres) to accommodate a middle school and recreational facilities. The School District's preliminary specifications list new middle schools as community recreational hubs open to the public and particularly focused on youth sports in Oregon City and the surrounding area. The Property is large enough to accommodate several ball fields and a football field. National School Design Standards list middle schools as community recreational hubs.

The Property is immediately adjacent to Holcomb Elementary School. The School District will be able to develop a unified campus with connections between the elementary school and the new middle school.

Finally, the Property is adjacent to the City boundary and to City services and is within the School District's boundary. Assuming that the Property is included in the UGB and eventually annexed to the City, the School District can easily extend City services to the site.

**3. What traffic impacts will the new middle school have?**

The School District retained Lancaster Engineering to perform a high level traffic analysis. Lancaster has determined that the surrounding transportation system should be able to

accommodate expected vehicle trips to the middle school. Mr. Mobley concluded that the transportation system can accommodate vehicle trips (parents, employees and school buses) from a middle school at this location (**Exhibit 2**). The City's Transportation Engineer has reviewed Mr. Mobley's report.

Most middle school students will travel by bus or their parents will bring them to school. To the extent street improvements are needed because of the middle school, those will be determined in the future land use applications and the School District will be obligated to make such transportation improvements. Further traffic analysis is both required and appropriate during each step of the local annexation, comprehensive plan and zoning map amendments and permitting stages.

**4. What is the timeline for the new middle school's development?**

The School District expects the UGB amendment process to take at least six months to complete, followed by an annexation, Comprehensive Plan and zoning map amendments, and a concurrent Site Plan, Design Review, and Conditional Use application which, collectively, may take between one and two years to complete. The School District must also seek financing for the school. The School District believes the new middle school will be open in the next seven to ten years. **Exhibit 3** shows the land development process for the new middle school's development.

**5. Can the new middle school be developed on School District-owned property that is already inside the City and the UGB?**

Part of the Metro UGB amendment process requires the School District to analyze opportunities for development of the new middle school within the existing UGB. The School District is preparing an application to submit to Metro. The initial findings evaluating other available lands conclude that no 32-acre site with appropriate topography is available within either the UGB or the City.

**6. What about citizen involvement?**

The School District intends to hold meetings with its stakeholders, neighborhood groups and other interested citizens once it submits the UGB amendment application to Metro. Interested parties will have an opportunity to participate in the UGB expansion process as well as the City land use process necessary to allow development of the Property. The Metro UGB amendment process is a public process, as are the future city land use applications necessary to annex the Property to the City and to develop the new middle school.

**7. What about other City services?**

As part of reviewing future applications for annexation, Comprehensive Plan and zoning map amendments and site development, the City will determine whether and to what extent it is able to provide water, sanitary sewer, transportation, police and park services for the new middle school. The School District requests that, as part of this process, the City Commission provide answers to the attached form for those services (**Exhibit 4**).

The School District will also seek separate comments on the UGB amendment from Clackamas Fire District and Tri-Met because the Property is within those service districts.

**8. Why is this request being made now?**

The School District must begin work on the UGB amendment application now. The Metro Code requires that the UGB amendment be submitted no later than March 15 of each year. The School District has asked the City Commission to consider this matter in January so that there is enough time for the School District to answer any questions and the City Commission to give an affirmative response to the School District's request.

**9. What are the next steps?**

The School District understands that the City has not and will not evaluate the service and facility extension demands placed on the City by this proposal at this time. The School District is only asking that the City Commission execute a resolution acknowledging the UGB amendment.

The School District, the School District's land use consultant and I look forward to meeting with you and answering any questions that you may have at your Work Session on January 16, 2019.

Very truly yours,

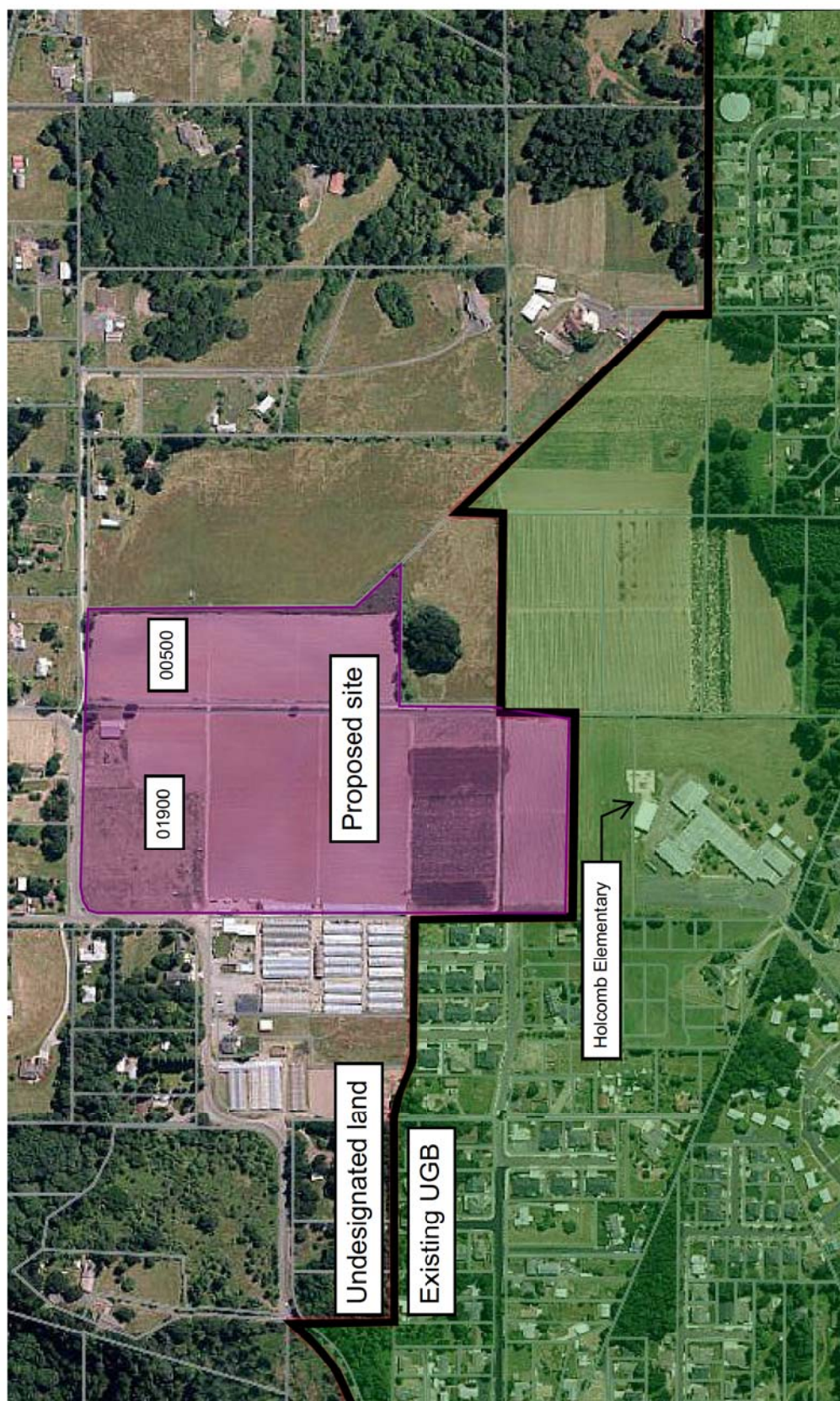


Michael C. Robinson

MCR:jmhi  
Enclosures

cc: Mr. Anthony J. Konkol (w/encls.) (via email)  
Ms. Laura Terway (w/encls.) (via email)  
Ms. Carrie A. Richter (w/encls.) (via email)  
Mr. Wes Rogers (w/encls.) (via email)  
Mr. Brad Kilby (w/encls.) (via email)  
Mr. Alexander D. Nelson (w/encls.) (via email)  
Mr. Todd E. Mobley, PE (w/encls.) (via email)

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2

**To:** Wes Rogers, Oregon City School District  
**From:** Todd E. Mobley, PE  
**Date:** November 25, 2018  
**Subject:** Ogden Middle School UGB Expansion  
Preliminary Transportation Assessment

This memorandum is written to provide the results of a preliminary transportation analysis examining the potential impacts and benefits associated with relocating Ogden Middle School to a site directly north of the existing Holcomb Elementary School. The project would require an amendment to the Portland Metropolitan Urban Growth Boundary (UGB) and annexation into the City of Oregon City.

The location of the proposed new Ogden Middle School site is at tax lot number 22E21D 01900, which is a 24.55-acre parcel immediately north of the existing Holcomb Elementary School. The location of the existing middle school, the proposed new location, and Holcomb Elementary are all shown in Figure 2 on the following page.

The map displays the proposed boundary for the City of San Antonio, Texas, which is outlined in green. The boundary encompasses a large area of land, including several major roads and water bodies. The roads shown include S Curry Rd, S Forsythe Rd, S Braley Rd, S Potter Rd, S Omele Rd, S Loder Rd, S Henry Rd, S Stenger Rd, S Beaver Creek Rd, S Wanger Rd, S Hark Rd, S Carr Rd, S Gieser Rd, S Harding Rd, S Womert Rd, S Rouse Rd, S Pear Rd, and S Wacker Rd. The map also shows the proposed boundary for the City of San Antonio, Texas, which is outlined in orange. The map includes a legend in the bottom left corner, which identifies the proposed city limits and the proposed city limits. The map is titled "Map of the City of San Antonio, Texas, showing the proposed boundary for the City of San Antonio, Texas." The map is dated 10/1/2010.

Exhibit 2  
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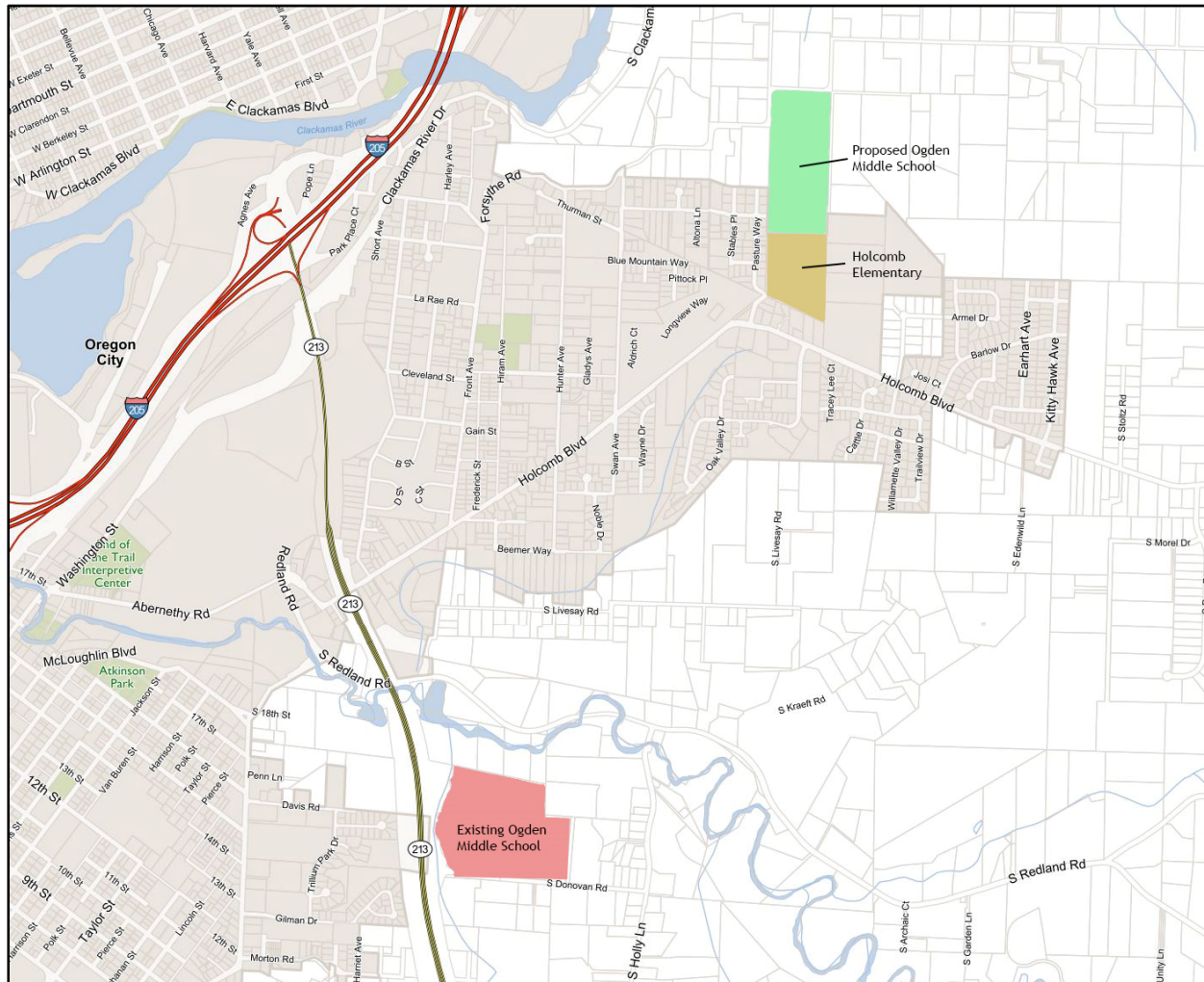


Figure 2 - Vicinity Map & School Locations

### ***Benefits of Co-Located Schools***

A key criterion in the search for a new site for Ogden Middle School is to co-locate the school on a common campus with another Oregon City School District facility. This co-location provides several benefits for the schools with the ability to share resources such as sports and play fields, large common areas such as auditoriums and gymnasiums, and parking supply. Careful scheduling of the school day as well as extracurricular events avoids concentration of traffic impacts and allows the District significant benefit from the shared resources.



Lancaster Engineering has worked recently with multiple school districts who have located two schools either on a common campus or in very close proximity. This includes the following school districts: Oregon Trail, North Clackamas, Scappoose, Seaside, and Warrenton.

### ***Trip Generation & Distribution***

Trip generation for schools is commonly estimated using data in the Trip Generation Manual, which is an industry-standard reference manual that is published by the Institute of Transportation Engineers (ITE). However, in this case Lancaster Engineering has conducted previous studies at both the existing Ogden Elementary School and at Holcomb Elementary. This allows us to examine the trip generation of the schools based largely on actual traffic count data rather than relying only on data from similar facilities in the ITE manual. It is worth noting that the traffic counts yield trip generation results that are very close to the published ITE rates.

Note that the trip generation reported in the table below does *not* include any reductions that may be appropriate based on the two schools being co-located on a common campus. Each school is currently stand-alone and is not adjacent to another school.

The morning and afternoon peak hours shown below coincide with the start of school in the morning and school release in the afternoon. This is usually the one-hour peak between 7:00 and 9:00 AM and between 2:00 and 4:00 PM. The evening peak hour reflects the peak of adjacent street traffic, most commonly the peak of commuter traffic, which is usually the one-hour peak between 4:00 and 6:00 PM. During the evening peak hour, school trip generation is significantly lower and is usually from extracurricular activities and staff.

**Table 1 - Trip Generation Summary**

	<b>Morning Peak Hour</b>			<b>Afternoon Peak Hour</b>			<b>Evening Peak Hour</b>		
	(School Arrival & Commuter Peak)			(School Release, Before Commuter Peak)			(After School Hours, Commuter Peak)		
	In	Out	Total	In	Out	Total	In	Out	Total
Existing Ogden Middle School <sup>1</sup>	237	209	446	122	147	269	64	67	131
Existing Holcomb Elementary <sup>2</sup>	193	144	337	57	95	152	26	20	46

<sup>1</sup> Based on traffic counts and impact study from 2012 when current modular classrooms were added. Evening peak hour data is estimated based on data from the ITE Manual since traffic counts were not available.

<sup>2</sup> From 2014 traffic counts conducted for the adjacent residential subdivision.



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It is important to note that trips generated by Ogden Middle School are already on the transportation system. Construction of a new school would not result in an increase in trips to the system as a whole but will change trip routes and impacts to intersections near the site. Also, access to both Holcomb Boulevard and Forsythe Road will avoid concentrating traffic impacts on one facility. Potential offsite traffic impacts are addressed in the following section.

### ***Potential Offsite Impacts***

Currently, all Ogden Middle School trips use Holly Lane to reach the school on Donovan Road. Traffic count data at the intersection of Donovan Road and Holly Lane shows that approximately 60 percent of the current school trips are to and from the north, via Redland Road. The remaining 40 percent are to and from the south via Maplelane Road.

### ***Access Location***

The proposed site for the relocated Ogden Middle School has frontage on Forsythe Road. That, together with access to Holcomb Boulevard through the Holcomb Middle School campus, will serve to disperse traffic impacts. The Oregon City Transportation System Plan (TSP) classifies Holcomb Boulevard as a Minor Arterial and Forsythe Road as a Collector. Both are of appropriate classification to carry school traffic.

Further analysis of offsite roadway and intersection impacts would be necessary as part of the UGB expansion but having access to both facilities gives the District the ability to control routes to and from the site and to disperse traffic impacts. Since Holcomb Boulevard connects to Redland Road to reach Highway 213 and Forsythe Road connects to Clackamas River Drive to reach Highway 213, each route would have significantly different impacts to the transportation system.

### ***School Schedules***

Operating two schools on a common campus would require a staggered schedule to avoid concurrent peaks in trip generation. In our experience, the stagger can range from 15 minutes to two hours. Often, this depends on logistics of busing students to school and whether the bus schedules and capacities allow the two schools to share busing. Some districts with a shorter stagger (such as Oregon Trail) can share busing, and other districts with a longer stagger (such as North Clackamas) bus each school separately.

Currently, Ogden Middle School and Holcomb Elementary have a 50-minute stagger. Due to bus scheduling and capacities, each of the two schools are bused separately. It is expected that this practice would continue at the new location, which would provide more than ample separation between the two school peaks. Figure 3 below shows an example of traffic volumes gathered in Happy Valley for co-located elementary and middle schools that have a one hour and forty-five-minute schedule stagger.

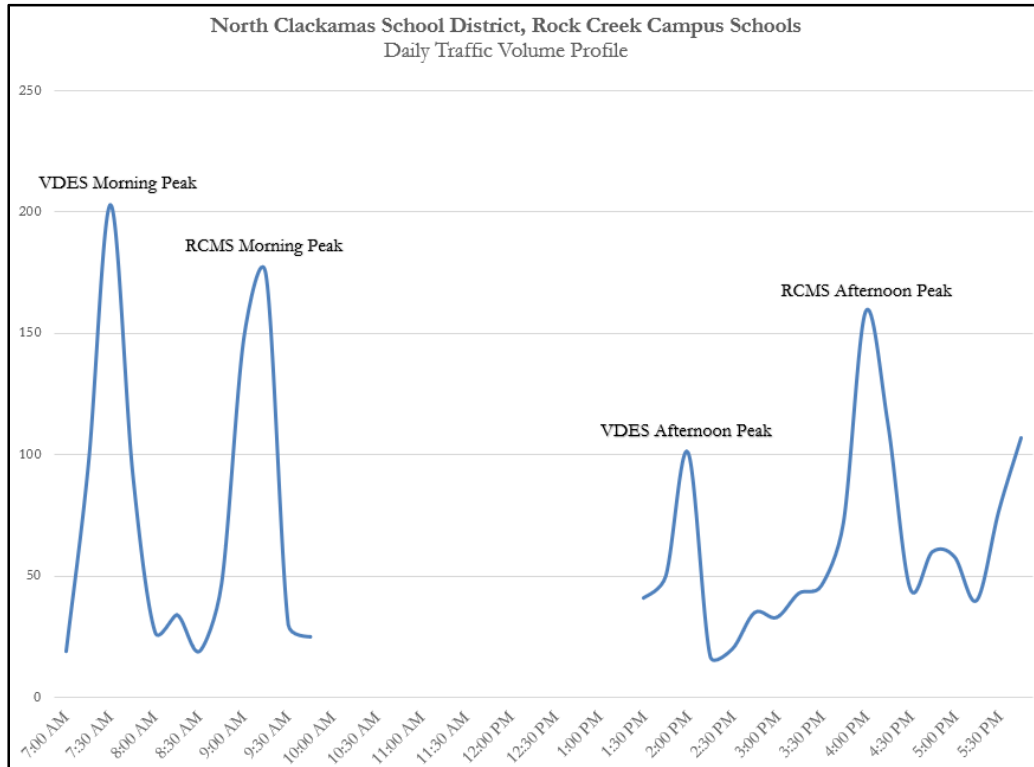


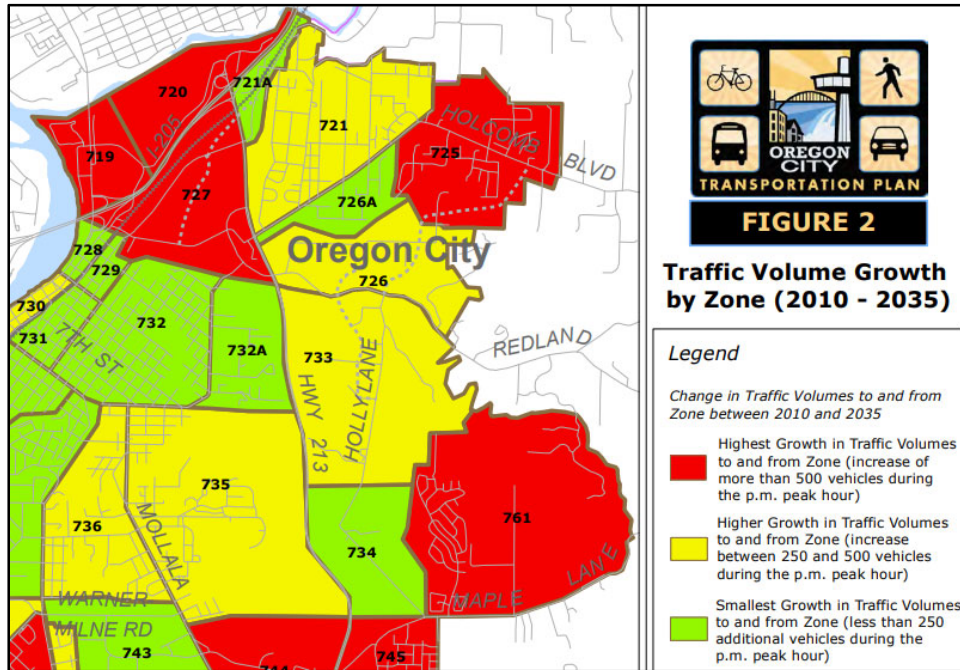
Figure 3 - Example of Elementary & Middle School Staggered Schedule

### *Safe Routes to School*

Perhaps the single-biggest contributor to traffic impacts and congestion associated with schools is the number of parents that drive their children to school. In Ogden Middle School's current location, virtually all students are either bused to school or dropped off by parents, since there is no pedestrian or bicycle infrastructure that would provide a safe route to and from the school.

With developing residential neighborhoods to the west and south of the proposed school site that provide newly constructed complete streets, there will be a number of safe routes to the school. In addition, there is considerable growth in residential neighborhoods anticipated immediately south of the site. In fact, the area to the south and the east of the site is in the highest category of anticipated future growth, as identified in the TSP. This is illustrated in **Error! Reference source not found.** below, which is an excerpt from the adopted TSP.

Notice in the figure, that the proposed location of Ogden Middle School will be in much closer proximity to anticipated growth than the current site. This will significantly increase the number of students that could safely walk and bike to school in the long term.



**Figure 4 - Anticipated Future Growth**

In addition, there is significant growth planned south of Holcomb Boulevard. Currently, the posted speed on Holcomb Boulevard is 40 mph and, in some locations, travel speeds are often significantly higher. As the area continues to develop and the character of the roadway and the neighborhood changes, it will likely be appropriate to reduce the speed zone.

As speeds reduce, it is recommended that additional pedestrian and bicycle infrastructure be considered that would provide a safe crossing for pedestrians and bicycles. For example, an enhanced crossing near Holcomb Elementary would provide an important link between the residential neighborhoods south of Holcomb Boulevard and the school campus to the north.



## ***Summary & Conclusions***

Based on this preliminary analysis, it is reasonable to expect that the proposed UGB amendment and Ogden Middle School relocation could be supported by the existing and planned transportation system. The following are key considerations that support this conclusion.

1. Schools generate fewer trips during the evening peak hour, which is nearly always the critical peak hour and what is examined and planned for in the City's TSP.
2. Trip generation of the school is dependent upon the number of residential dwelling units within the attendance boundary. Therefore, the UGB amendment for the school would not result in an overall increase in trip generation for the city, which would be the case if the UGB were being expanded for other land uses.
3. A staggered schedule is recommended to avoid the traffic congestion that would result if both the elementary and middle schools started and ended at the same time. Currently, bus schedules and capacities dictate a stagger of 50 minutes, which would easily avoid overlapping traffic impacts.
4. Access to either Forsythe Road and/or Holcomb Boulevard should be carefully managed in order to control traffic impacts to offsite roadways and intersections. Further analysis of roadway width and geometry will be required to determine the suitability of Forsythe Road to carry additional school bus traffic.
5. By co-locating Odgen Middle School and Holcomb Elementary, there are a number of efficiencies that could be realized, resulting in reduced transportation impacts when compared to two separate stand-alone facilities.
6. With targeted infrastructure improvements that would serve people walking or biking, the number of students who could safely walk or bike to school could be increased significantly when compared to the current schools.

## **EXHIBIT 3**

### **Land Use Applications Required to Develop Property for Middle School**

- 1. Major UGB Amendment.** Application to Metro under Metro Code 3.07.1430 and 3.07.1440 to add land to the UGB specifically for the middle school. Public hearings before the Metro Hearings Officer and Metro Council after general newspaper notice and mailed notice to the state, City and county and surrounding property owners. Process takes about 6 months. Application must be submitted by March 15, 2019. Decision should be issued in September or October, 2019. Requires analysis of ability to serve the site with public services and transportation. The UGB amendment is necessary so that the School District knows that it has property that can accommodate the middle school.
- 2. Concept Plan Approval.** This is a Metro staff-level approval that shows Metro how the middle school will fit on the property. The School District will coordinate with City staff before making the Concept Plan submittal to Metro.
- 3. Annexation to City of Oregon City and Comprehensive Plan Map and Zoning Map Designations.** Application to the City for annexation and map designations. Public hearings before the Planning Commission and City Commission. On-site posting and mailed notice to surrounding property owners. Process takes about 6 months. Application can be submitted after final decision by Metro. Application could be submitted in 2020. Analysis of transportation and public services required.
- 4. Site Plan, Design Review and Conditional Use Permit Applications.** Three concurrent applications to the City to allow construction of the middle school. Includes analysis of transportation and public service requirements. On-site posting and mailed notice to surrounding property owners. Process takes about 6 months. Public hearing before the Planning Commission and hearing before the City Commission if there is an appeal. Application timing is dependent upon School District bond issue.
- 5. Building Permits and Public Improvements.** Following approval of all of the above applications, the school district can submit for building permit approvals. Any required transportation improvements and extension of public services will be constructed before the middle school opens.

NOTE: An appeal of any of the applications will result in a different application schedule.

## REQUEST FOR COMMENT FROM SERVICE PROVIDER

*(Part I to be completed by applicant and submitted to each service provider. Part II to be completed by the service provider and returned to the applicant to be included in the application package.)*

### PART I

To: \_\_\_\_\_

Name of Service Provider

From: \_\_\_\_\_

Name of Applicant

Attached is a copy of an application for an amendment to the Metro Urban Growth Boundary (UGB). Please review this application and return your comments on it to the applicant as soon as possible, but **NO LATER THAN** \_\_\_\_\_.

In general, land placed inside the UGB will develop to an average residential density of ten or more units per net buildable acre or for urban commercial or industrial use, as determined by local zoning. Land outside the UGB cannot be served by sewer, and generally, cannot be developed at more than one unit to the net acre. In reviewing this petition, please consider: (1) whether its approval would make it more efficient (less expensive) or less efficient (more expensive) to serve other, adjacent areas for which service is planned or expected; and (2) whether there would be an orderly and economic way to extend your service to the area included in the petition if the petition were approved.

Thank you for your help. Please contact \_\_\_\_\_ at \_\_\_\_\_ regarding any specific questions on the application. Please call the Regional Planning Department at Metro, 503-797-1839, if you have any general questions on the UGB amendment process.

### PART II

I have reviewed the attached application for an amendment to Metro's UGB. In reviewing the application, I have reached the following conclusions (mark an "X" in the appropriate space and indicate your reasons):

1. Approval of the application would make it \_\_\_ more efficient (less expensive on a per unit basis), \_\_\_ less efficient (more expensive on a per unit basis), or \_\_\_ would have no efficiency impact (same expense on a per unit basis) to serve other adjacent areas inside the UGB for which service is planned and expected, for the following reasons:

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2. If the application were approved, the area \_\_\_ could, or \_\_\_ could not be served by us in an orderly and economic fashion, for the following reasons:

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3. My position on the application is:

\_\_\_\_\_ I Support Approval

\_\_\_\_\_ I Oppose Approval

\_\_\_\_\_ I am Neutral

\_\_\_\_\_ I Support with Conditions

Comments and explanation (explain any conditions):

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Signed \_\_\_\_\_ Date \_\_\_\_\_

Title \_\_\_\_\_

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08/11/06