

# Molalla Comprehensive Plan and Development Code – Draft Goal Findings and Conclusions

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The benefit to the public from the proposed use clearly outweighs the public good from retaining the wetland area

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## Introduction

In response to unprecedented growth, the city of Molalla has engaged in a multi-year process to establish a community vision and to overhaul the 30-year old *Molalla Comprehensive Plan* or more simply, “the comprehensive plan”.

As noted on the City’s website and in the draft comprehensive plan update, Molalla’s vision can be summarized in a few simple words:

***Molalla – A recreation-oriented and family-friendly community  
with a vibrant downtown and livable neighborhoods***

To realize this vision consistent with Oregon’s statewide planning program, Molalla has worked cooperatively with its citizens and with affected units of government to develop and adopt a series of implementing plans and land use regulations:

- The *Molalla Park and Recreation Master Plan* or “parks plan” (Cogan Owens Cogan, 2009) and
- The *Molalla Development Code* or “development code” (City of Molalla, 2010)
- The *Molalla Urban Reserve* or “urban reserve” (Winterbrook Planning, 2010)

Each of these plans and implementing measures is supported by one or more background studies – each of which has been modified several times to incorporate comments from the public, Clackamas County and affected state agencies. These background documents are adopted by ordinance and referenced as Volume II of the comprehensive plan.

Winterbrook prepared findings in support of the proposed Molalla Urban Reserve in 2009 based on information found in these background studies.

## Purpose and Organization of these Findings

The findings in this document demonstrate why the 2010 version of the comprehensive plan (as implemented by the downtown plan, the parks plan, and the development code), is consistent with applicable statewide planning goals.

The organization of these findings is straightforward: each applicable statewide planning goal is cited and paraphrased, followed by an explanation of why the new comprehensive plan and implementing plans and land use regulations are consistent with the referenced goal.

## Applicable Statewide Planning Goals

Applicable statewide planning goals (and implementing administrative rules) include the following:

- Goal 1: Citizen Involvement
- Goal 2: Land Use Planning
- Goal 5: Natural Resources (OAR 660, Division 023)
- Goal 6: Air, Water and Land Resources Quality
- Goal 7: Natural Hazards
- Goal 8: Recreational Needs
- Goal 9: Economy of the State (OAR 660, Division 009)
- Goal 10: Housing (OAR 660, Division 008)
- Goal 11: Public Facilities and Services (OAR 660, Division 011)
- Goal 12: Transportation (OAR 660, Division 012)
- Goal 13: Energy Conservation
- Goal 14: Urbanization (OAR 660, Division 024)

## Goal 1: Citizen Involvement

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

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Goal 1 is at the heart of Oregon's planning program. The ability of citizens to participate in all phases of the planning process is critical to Goal 1 compliance. The ability to participate in the process is not, however, the same as giving all participants what they want. After listening and responding to comments from Molalla and rural residents, property owners and businesses, the Council made policy choices that it believed were in the best interest of the community as a whole. In certain cases, this led to an unsatisfactory result for some participants in the process.

### Planning Commission and Council Work Sessions

Between January 2005 and March 2009, Molalla Planning Commission held 149 public work sessions on the comprehensive plan, development code, downtown plan, and park and recreational plan and supporting background documents. Materials considered at each work session were made available at the Planning Department for public review. Each document was revised several times as a result of the public review process. Each series of revised documents was posted on the City's website at <http://www.molallaplanning.com>.

To ensure the full airing of all issues raised, and in addition to the 149 planning commission work sessions, the planning commission and city council held a series of eight joint public work sessions on the comprehensive plan and supporting documents. These work sessions were held from November 2007 to September 2008, on the following dates: 11/13/07 - 11/21/07 - 12/5/07 - 12/12/07 - 2/20/08 - 3/5/08 - 4/6/08 - 9/17/08.

### Public Hearing Process

The planning commission considered public testimony regarding each of the documents cited above at 19 public planning commission hearings. Each was publicly noticed and opportunity for public comments was provided. These hearings were held on the following dates: 10/14/08 - 10/28/08 - 11/5/08 - 11/18/08 - 12/2/08 - 12/9/08 - 4/7/09 - 4/14/09 - 4/28/09 - 5/12/09 - 5/28/09 - 6/16/09 - 7/7/09 - 7/9/09 - 7/14/09 - 7/16/09 - 8/11/09 - 9/1/09 - 9/2/09.

After the planning commission public hearing process, the City Council held nine separate public hearings on the documents between October 2009 and February 2010. These hearings

occurred on the following dates: 10/14/09 - 10/21/09 - 10/28/09 - 11/4/09 - 11/18/09 - 12/2/09 - 12/9/09 - 1/20/10 - 2/10/10.

### **Agency Coordination**

Notice of adoption of the comprehensive plan, downtown plan, park plan and development code was provided to the Department of Land Conservation and Development on August 15, 2008, and DLCD submitted a letter stating official acknowledgement of the submittal on October 30, 2008.

Coordination with Clackamas County staff was extensive. Please see discussion under Goal 2. The record shows that City staff has communicated with the Oregon Department and Land Conservation and Development (DLCD) and Transportation (ODOT) on a regular basis during the course of the 2010 comprehensive plan update. As documented in the record, these meetings and correspondence from these agencies resulted in substantial amendments to the relevant background studies, the comprehensive plan, and development code.

### **Staff Availability**

City staff was responsive to requests for information and to comments from citizens, property owners and businesses. The Planning Director and City Manager held hundreds of meetings with individual citizens, property owners and state agency staff over the last 5 years. Although not everyone was satisfied with the results of these meetings, all had multiple opportunities to interact by telephone, in writing, or in person with responsible staff at the city.

### **Goal 1 Conclusion**

Molalla's public involvement process exceeded Goal 1 requirements. There were a total of 177 publicly noticed work sessions and public hearings on the comprehensive plan, background documents, and implementing plans and land use regulations. Citizens and agency representatives had access to draft documents – either by visiting the planning department or going online. Citizen and agency comments were considered and accommodated in the plan wherever possible, consistent with applicable statewide planning goals and the broader public good as viewed by the City Council.

### **Goal 2: Land Use Planning Process**

*To establish a land use planning process and policy framework as a basis for all decisions and actions related to the use of land and to assure an adequate factual base for such decisions and actions*

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## **1. Inter-Jurisdictional Plan Consistency**

Molalla has coordinated extensively with Clackamas County and affected state agencies in the plan development and adoption process. There were four primary coordination issues: (a) co-adoption of a coordinated 20-year population projection for the Molalla urban area; (b) co-adoption of the Molalla Comprehensive Plan as it applies outside the Molalla city limits; (c) co-adoption of an urban reserve boundary; and (d) co-adoption of interim development standards to limit development on rural residential land outside the UGB.

It is anticipated that the first issue – that of a coordinated 20-year population projection – will be addressed when the City moves forward with a UGB amendment in 2010-11. The City will be working with Clackamas County staff, appointed and elected officials over the coming months towards co-adoption of items b-d.

## **2. Adequate Factual Base and Consideration of Alternatives**

The comprehensive plan is supported by several background studies that provide the factual basis and alternatives analysis required by Goal 2. Each of these background studies has been amended prior to adoption by the City Council to consider and accommodate comments from citizens, Clackamas County or affected state agencies.

- *Molalla Economic Profile* (E. Hovee, 2004)
- *City of Molalla Residential Land Needs Report* (Winterbrook Planning, 2009)
- *Buildable Lands Inventory Methods and Maps for Molalla UGB and URA* (Winterbrook Planning and the City of Molalla, 2007)
- *Urban Reserve Findings* (Winterbrook Planning, 2010)
- *Downtown & OR 211 Streetscape Plan* (Cogan Owens Cogan, 2008)
- *Molalla Downtown Master Plan* (Cogan Owens Cogan, 2009)
- *City of Molalla Historical Resources Inventory* (Projected 2010)
- *Molalla Local Wetlands Inventory* (Pacific Habitat Services, 2004)
- *Capital Improvements Plan Summary Findings and Recommendations* (City of Molalla, 1999 - 2004)

## **3. Availability of Plans and Implementation Measures**

All background documents and each of the seven drafts of the comprehensive plan and development code were available to the public at city hall and on the city's webpage. City staff also made themselves available to meet with citizens and state agencies, and respond to their questions, upon request.

## **4. Adoption and Review by the City Council**

The City Council (will have / has) adopted the comprehensive plan, the downtown plan, the park plan and the development code by ordinance. The adopting ordinance and the

comprehensive plan itself (page 2-4) make it clear that the supporting documents were adopted as part of the comprehensive plan and serve as the factual basis for consideration of alternatives leading up to plan adoption.

## Goal 2 Conclusion

Molalla’s comprehensive plan includes a series of background studies that provide the factual basis and analysis of alternatives required by Goal 2. The comprehensive plan is implemented by a series of functional or area plans, as well as the newly-minted *Molalla Development Code*. Background studies, the comprehensive plan, functional plans and the development code have undergone extensive revisions over the last five years of public and agency involvement.

Molalla has coordinated extensively with Clackamas County staff and affected state agencies – particularly with DLCD and ODOT – in the development and modification of these planning documents. Following an extensive public involvement process, the City Council has adopted final versions of these planning documents by ordinance. Molalla complies with Goal 2.

## Goal 5: Natural Resources

*To protect natural resources and conserve scenic and historic areas and open spaces*

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Goal 5 is implemented by the “Goal 5 rule” – OAR 660, Division 023. This rule requires cities to address riparian corridors, wetlands and wildlife habitat. The rule does not require cities to prepare scenic or historic inventories.

Molalla’s Local Wetland Inventory (LWI) was completed in 2004. This inventory addresses wetlands, streams and associated fish and wildlife habitat values within the existing UGB. As part of the comprehensive plan update process, Winterbrook Planning prepared an inventory of Goal 5 resource sites in alternative urban reserve expansion areas immediately outside the existing Molalla urban growth boundary (UGB). (*Molalla Natural Resources Report*, Winterbrook 2008) This inventory describes and maps riparian corridors, wetlands and associated wildlife habitat.

Molalla also adopted plan policies and land use regulations to protect inventoried riparian corridors and wetlands in a manner similar to the “safe harbor” provisions of OAR 660-023-0090 (riparian corridors) and -0100 (wetlands). In accordance with OAR 660-023-0070, riparian corridors and wetlands protected through the Goal 5 process are removed from the city’s buildable lands inventory (BLI).

Molalla is committed to a goal of creating an inventory and preserving historically significant sites and structures within the Molalla UGB. This *Historical Resources Inventory* is expected to be completed in 2010.

### **ESEE Analysis**

The draft comprehensive plan calls for protecting riparian corridors and wetlands in a manner “similar to” Goal 5 safe harbor provisions. Generally, these safe harbors require protection of:

- Locally significant wetlands that are separate from riparian corridors to the delineated wetland edge.
- Riparian corridors, including wetlands next to a stream, for a distance of 50 feet from the top to stream bank or edge of associated wetland.

Molalla proposes to vary from this safe harbor in two ways:

1. **Isolated wetlands** may be modified in accordance with the strict environmental impact criteria found in Section 18.7.150.C, where “necessary to accommodate reasonable development of a property.”
2. **The 50-foot streambank setback** may be modified in accordance with the strict environmental impact criteria found in Section 18.7.150.D provided that the average setback remains 50 feet or more *and* the setback is not reduced below 25 feet.

### **Economic Consequences**

The economic consequences of these minor adjustments to the safe harbor provisions of Goal 5 are generally positive. The modifications provide greater flexibility in the application of protection standards to isolated wetlands and riparian corridors, thereby increasing the usable area of private and public property. This will have a positive economic impact.

It is recognized that protecting wetlands and stream corridors have positive economic consequences – in terms of their flood storage capacity and positive effect on land values for adjoining properties. However, the avoidance and mitigation requirements of the aforementioned code requirements will minimize any potential adverse economic impacts resulting from impacts to isolated wetland or altered riparian corridors.

### **Environmental Consequences**

The environmental consequences are mixed. While the safe harbor provisions do not allow any reduction in isolated wetland area or riparian corridor setbacks, the more moderate approach taken by the city *only* allows such modifications after an exhaustive environmental review and with appropriate and effective mitigation. Therefore, it is unlikely that there will be severe adverse economic consequences resulting from application of the city’s more moderate and flexible standards.

For example, a setback reduction must include removal of invasive plant species from the protected setback area, and replacement with native species. There are several similar provisions that would likely result in increased environmental protection within the modified riparian setback area.

### *Social Consequences*

Wetlands and stream corridors provide protected urban open spaces which have positive social values to those living near, travelling through, or working in the vicinity of these important natural features. The city's more flexible process takes these social consequences into account. For example, to modify an isolated wetland, the approval authority must find that "The benefit to the public from the proposed use clearly outweighs the public good from retaining the wetland area" and that the wetland is integrated into the overall project design. Reduction of stream setbacks cannot reduce the average setback below 50 feet – while maintaining a minimum 25-foot setback area. This provision could allow people to interact on a more intimate basis with the natural feature – while preserving its overall functions and values.

On balance, the social consequences of the city's approach do not have serious adverse social consequences and would likely have social benefits.

### *Energy Consequences*

The energy consequences of the city's approach are minimal. Trees associated with wetland and streams provide positive energy impacts by reducing heat island in urban areas and mitigating the adverse affects of sun and wind on energy for home heating. The decision criteria and mitigation requirements for isolated wetlands and riparian corridors ensure that major reductions in native vegetation will not occur. Therefore, it is unlikely that the energy conservation benefits of riparian corridors and wetlands will be adversely impacted.

### *ESEE Conclusion*

The relatively minor variations from the safe harbor provisions of Goal 5 are minimal in terms of the ESEE consequences. Economic consequences are generally positive, with few if any major adverse environmental, social and energy consequences.

## **3. Plan Policies**

The comprehensive plan includes policies to protect inventoried stream corridors and wetlands. These policies as they applied to water resources are supported by the ESEE analysis above.

- Goal 5 Water Resources Policies 1-8; and
- Goal 5 Historic Resource Policies 1-14.

#### **4. Development Code Provisions**

The Molalla Development Code provisions implementing the comprehensive plan policies referenced above are found in Section 18.7.100 related to “Sensitive Lands.”

#### **Goal 5 Conclusion**

Molalla’s protection of historic resources and significant water resources complies with Goal 5.

#### **Goal 6: Air, Land and Water Resources Quality**

*To maintain and improve the quality of the air, water and land resources of the state*

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Goal 6 requires cities and counties to adopt policies to coordinate with the Oregon Department of Environmental Quality (DEQ) to ensure that air, land and water quality resources are not degraded.

The comprehensive plan includes such coordination policies: Goal 6 Policies 1-15.

#### **Goal 7: Areas Subject to Natural Hazards**

*To protect people and property from natural hazards*

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Molalla has inventoried its natural hazards as required by Goal 7. There are two categories of natural hazards affecting land within the Molalla UGB and the proposed urban reserve area:

- Flood hazards
- Landslide and erosion hazards

#### **Flood Hazards**

The comprehensive plan includes policies to ensure that development within the floodplain meets FEMA (Federal Emergency Management Agency) location and construction requirements (*Molalla Comprehensive Plan*, Goal 7 Natural Hazards). These policies are implemented by several chapters in the development code. Although limited development may be permitted within the 100-year floodplain under local regulations:

#### **Landslide Hazards**

The comprehensive plan includes policies to ensure that development on slopes of 25% or greater is controlled to minimize landslide and erosion hazards (*Molalla Comprehensive Plan*,

Goal 7 Natural Hazards). These policies are implemented by several sections of the development code.

## Goal 7 Conclusion

Molalla has effect provisions to limit development on steep slopes and within floodplains as required by Goal 7.

## Goal 8: Recreation Needs

*To satisfy the recreational needs of the citizens of the state and visitors*

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To address long-term park and recreational needs in the community, the city of Mollala has adopted *The Molalla Park and Recreation Master Plan*. This plan includes an inventory of existing facilities, recreational goals and policies, and future park and recreational facilities needs. The park plan identifies a target ratio of 10 park acres per 1,000 population. This ratio was used to determine long-term park land needs in the community.

## Goal 9: Economy of the State

*To provide adequate opportunities through the state for a variety of economic activities vital to the health, welfare and prosperity of Oregon's citizens*

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Goal 9 is implemented by the Goal 9 rule (OAR Chapter 660, Division 009). This rule requires that each city:

- Consider national, state and local trends to identify comparative economic advantages;
- Adopt economic development goals and policies as part of the comprehensive plan;
- Determine how much and what kind of land will be need to meet the site requirements of targeted employment opportunities;
- Designate sufficient “suitable” land to meet locally-identified employment goals; and
- Limit incompatible uses near designated employment sites.

## Background Studies

Molalla has prepared the following economic studies pursuant to Goal 9 requirements:

- *Molalla Economic Profile* (Hovee, 2004)
- *2009 Employment Land Needs Analysis* (Winterbrook, 2009)

## Economic Policies

The comprehensive plan includes a coherent economic development strategy, based on the *Economic Profile* and the *Employment Land Needs Analysis*, as well as extensive feedback from the public and City officials. The strategy is implemented through the following policies:

- Goal 9 Economic Development Policies 1-26;
- Downtown Development Policies 1-12;
- Community Planning Area Policies 1-8;
- Commercial Development Policies 1-21; and
- Industrial Development Policies 1-26.

## Development Code

The development code implements this strategy with the following employment zones:

- Central Business District (C-1);
- General Commercial (C-2);
- Light Industrial (M-1);
- Heavy Industrial (M-2);
- Highway Commercial Overlay (HC);
- Support Commercial Overlay (SC); and
- Employment Zone Overlay (EZ).

These zones are specifically designed to address transitional uses to ensure compatibility with targeted employment uses.

## Goal 9 Conclusion

The City's has reviewed economic trends and projected employment needs as required by Goal 9. The City's comprehensive plan provides a clear economic development strategy that is implemented by a series of employment zones. Molalla's comprehensive plan and development code amendments comply with Goal 9.

## Goal 10: Housing

*To provide for the housing needs of citizens of the state*

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Goal 10 requires that cities designate sufficient buildable land – under clear and objective approval standards – to meet identified housing needs by type and density.

## Background

Molalla has conducted a “housing needs analysis” (HNA) to determine the amount of land that will be needed during the 20-year planning period for the UGB, and the 50-year planning period for the urban reserve. (Winterbrook, 2009) In part because of disparaging comments from DLCD regarding the results of the HNA (DLCD Letter, March 19, 2009), the city decided to rely on housing type and density “safe harbors” found in OAR 660-024, Table 1. The density safe harbor is, according to the rule “conservative”.

The safe harbor assumptions permitted by this rule resulted in slightly lower densities than originally projected in the city’s HNA. The density safe harbor for purposes of determining long-term land need, for a community with a growth projection below 25,000, is 7 units per net buildable acre. This density “safe harbor” was used to project, conservatively, 20-year and 50-year residential land needs in Molalla.

Prior to expanding the Molalla UGB to meet identified needs, the city will show that its residential buildable land supply is appropriately zoned – under clear and objective approval standards – to allow (a) at least 9 units per net buildable acre of residential land, and (b) with an overall density floor (minimum density) of 5 units per net buildable acre or greater. The city will also show that its zoned its buildable land supply to allow – under clear and objective standards – at least 20% of its future new housing units to be multifamily in high density residential zones, and 25% of its new housing units to be multifamily, attached or manufactured homes in parks in its medium density residential zones.

## Comprehensive Plan Policies

The comprehensive plan includes policies and measures to necessary to meet the city’s housing affordability obligations under Goal 10. These policies are described in the Comprehensive Plan’s Goal 10 Housing Policies (1-25). Single-family, multi-family, and mixed-use measures are found in the Comprehensive Plan Goal 10 Zoning and Implementation section.

The plan includes three primary residential plan designations: Low, High and Medium Density Residential.

- The **Low Density Residential** designation is implemented by the R-1 zoning district, which allows up to 8 dwelling units (du) per net buildable acre (nba), with a minimum density of 4 du/nba. Detached single family and duplexes are permitted outright under clear and objective standards.
- The **Medium Density Residential** designation is implemented by the R-2 zoning district, which allows up to 12 dwelling units du/nba, with a minimum density of 6 du/nba.

Detached and attached single family, duplexes and manufactured dwelling parks are permitted outright under clear and objective standards.

- The **Medium-High Density Residential** designation is implemented by the R-3 zoning district and, in defined areas by the HDR overlay district. The R-3 zone allows up to 24 du/nba with a minimum density of 12 du/nba. The HDR overlay zone allows up to 34 du/nba with a minimum density of 20 du/nba. Detached and attached single family, duplexes, and multifamily dwellings are permitted outright under clear and objective standards.

### **Mixed Use and Historic Zones**

The development code includes mixed use zones that carry out these policies by allowing housing through the redevelopment process in the Historic (R-5) and Community Planning Area (CPA) districts. The R-3 zone allows up to 24 dwelling units (du) per net buildable acre (nba), with a minimum density of 12 du/nba.

### **Goal 10 Conclusion**

Molalla has revised its comprehensive plan and development code to allow a wider range of housing types – at higher densities – within its residential and mixed use zones. Prior to proposing a UGB amendment, Molalla will demonstrate that it has allocated buildable residential land in a manner that meets Division 024 safe harbor provisions related to housing type and density.

### **Goal 11: Public Facilities and Services**

*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*

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Goal 11 requires cities to prepare “public facilities plans” (PFPs) that identify the timing, location and funding sources of sanitary sewer, water, storm drainage and transportation projects necessary to serve projected population and employment growth during the 20-year planning period. Goal 11 is implemented by the Goal 11 Rule (OAR 660, Division 011).

When considering alternative locations for UGB expansion or placement of urban reserves, cities are required to identify major public facilities projects necessary to serve each area under consideration, and to consider the cost implications of providing urban services to these areas. Molalla is *not* considering UGB expansion at this time.

## Comprehensive Plan

The comprehensive plan includes a discussion of sanitary sewer, water, storm drainage and transportation facilities necessary to support planned growth inside the UGB. (*Molalla Comprehensive Plan*, Goal 11) The city recognizes that the PFP will need to be updated prior to expanding the UGB.

As noted in the findings supporting establishment of the Molalla urban reserve, the city has identified major public works projects necessary to serve the proposed urban reserve area and their relative costs. (*Molalla Urban Reserve Findings*, Consideration of Goal 14 Location Factors).

## Development Code

The development code includes specific standards to ensure that new development is supported by an adequate level of public facilities and services as called for in the comprehensive plan and by Goal 11 (*Molalla Comprehensive Plan*, Goal 11 Policies). Title 18 – Community Design Standards – includes objective standards that ensure the timely and efficient provision of sanitary sewer, water, storm drainage and transportation facilities and services to new development, as required by Goal 11.

## Goal 11 Conclusion

The Molalla Comprehensive Plan and Development Code ensure that an adequate level of public facilities and services is provided to new development within the Molalla UGB.

## Goal 12: Transportation

*To provide and encourage a safe, convenient and economic transportation system*

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Goal 12 is implemented by the Transportation Planning Rule (aka the “TPR” or OAR Chapter 660, Division 012). Goal 12 and the TPR require that each city prepare and adopt a Transportation System Plan (TSP) to provide for all modes of transportation. The TSP must describe the timing, location, cost and funding mechanisms for transportation projects necessary to serve planned land uses within the UGB.

The Molalla TSP (Kittelsohn, 2001) is designed to address transportation impacts through the year 2020. Following the anticipated expansion of the UGB, the TSP will need to be amended to address planned growth through at least the year 2030. The city recognizes that land within the expanded UGB cannot be zoned for urban uses until the updated TSP has been adopted by the city and county and acknowledged by the Land Conservation and Development Commission.

## Coordination with ODOT

Throughout the entire planning process the City and ODOT have maintained a constant dialogue. During the months of May 2008 through August 2008 staff worked with ODOT representative Sonya Kazen on multiple occasions to address concerns from ODOT. These concerns were addressed due to the numerous interactions city staff and ODOT representative Sonya Kazen was able to have.

## Comprehensive Plan Policies

The comprehensive plan includes new transportation policies. The following policies were incorporated into the plan after extensive coordination with, and support from, Sonya Kazen of the Oregon Department of Transportation.

- Goal 12 Streets and Roads Policies 1-39;
- Goal 12 Railroads Policies 1-3; and
- Goal 12 Public Transportation Policies 1-9.

Molalla anticipates extensive amendments to its TSP to account for planned urban development through the 20-year planning horizon.

## Development Code Provisions

The development code specifies when transportation impact studies must be conducted to address land use impacts. (Sections 18.1.200 and 19.1.910) These sections address Transportation Planning Rule Section 060 “significant impacts” as required by the TPR.

## Goal 12 Conclusion

Molalla has coordinated extensively with ODOT in amending its comprehensive plan and development code to ensure Goal 12 compliance. Molalla is committed to amending its TSP to account for planned development over the next 20 years.

## Goal 13: Energy Conservation

*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*

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This goal does not have an implementing administrative rule. Energy conservation is addressed primarily by Goal 14: Urbanization, which requires a compact urban growth form; and by Goal 12: Transportation, which requires that cities develop transportation systems that conserve energy.

The comprehensive plan addresses energy conservation through over 20 energy conservation policies (*Molalla Comprehensive Plan*, Goal 13, Energy Conservation Policies).

## Goal 14: Urbanization

*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*

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Goal 14 requires that cities establish and maintain urban growth boundaries to accommodate 20-year land needs. UGBs are adopted by both the city and the county and separate urban from rural lands. Goal 14 requires cities and counties to coordinate the efforts to ensure that land is used efficiently within UGBs.

### Comprehensive Plan

Molalla has not amended its UGB since it was adopted as part of the comprehensive plan in 1981. The comprehensive plan now includes an urban reserve that is intended to allow the city to plan for public facilities necessary to serve an estimated population of 24,829 in the year 2060. Please see Winterbrook's urban reserve findings for more details.

The comprehensive plan includes policies to manage growth within the Molalla UGB. (*Molalla Comprehensive Plan*, Goal 14, Molalla Urban Growth Management Policies). Connection to city services is required to allow urban development within the UGB; annexation to the city is required for public facilities and services to be extended to serve unincorporated land within the UGB.

### Urban Growth Management Agreement

Clackamas County has applied its Future Urban – 10 holding zone to ensure that urban development does not occur prior to annexation to the City.

### Goal 14 Conclusion

Molalla has policies and development standards to ensure the efficient use of land within its existing UGB. With only 70 buildable residential acres remaining in the existing UGB, Molalla anticipates a substantial UGB amendment in 2010-11. Any UGB amendment proposal will be consistent with OAR Chapter 660, Division 024, Urban Growth Boundaries.

## **Overall Conclusion**

Molalla has worked for over the last seven years to completely overhaul its 30 year-old comprehensive plan and land use regulations. These amendments have a solid factual base and considered a wide range of alternatives. The city has worked closely with DLCD, ODOT and Clackamas County staff to consider and accommodate the needs of these important partners.

As documented in these findings, the comprehensive plan and development code are responsive to and consistent with applicable statewide planning goals.