# MAJOR URBAN GROWTH BOUNDARY AMENDMENT

# Advance Road Property



Submitted to Metro by West Linn-Wilsonville School District

March 15, 2013



# METRO UGB MAJOR AMENDMENT APPLICATION Advance Road Site

#### for

## West Linn-Wilsonville School District

3.15.13

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#### SECTION I: APPLICATION SUMMARY

CASE: Major UGB Amendment

PETITIONER: West Linn-Wilsonville School District

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PROPOSAL: An Urban Growth Boundary (UGB) Amendment to bring a 40.05-acre portion of

Metro Urban Reserve Area 4H into the UGB. The purpose of the UGB amendment is to allow for the future construction of a new middle school, primary school, and city park. The most immediate need is for additional middle school capacity. The district's three middle schools are all at or over capacity, and the enrollment pressure is forecast to increase. The district will soon need to sponsor a bond measure to finance a new middle school, and having the site available to develop is a critical first step. While not as pressing, additional primary school and park capacity will be necessary as the city develops within the existing UGB and the Urban Reserve areas within Wilsonville's sphere of influence. The district and city have a long history of co-locating school and park facilities to obtain the maximum benefit for the community and using land and financial resources efficiently. The entire site, along with the abutting Advance Road and 60<sup>th</sup> Avenue right-of-way, is proposed to be added within the UGB because the current EFU zoning does not

allow partitions or property line adjustments.

LOCATION: The property is located on the south side of SW Advance Road, immediately east

of the Wilsonville city limit, and west of SW 60<sup>th</sup> Avenue (Figure 1).

PLAN/ZONING

DESIGNATION: Clackamas County EFU

**APPLICABLE** 

REVIEW CRITERIA: Metro Code 3.07.1440 and 3.07.1425 – Major Amendments - Criteria

Figure 1 - Vicinity Map



#### SECTION II: PROPOSAL DESCRIPTION

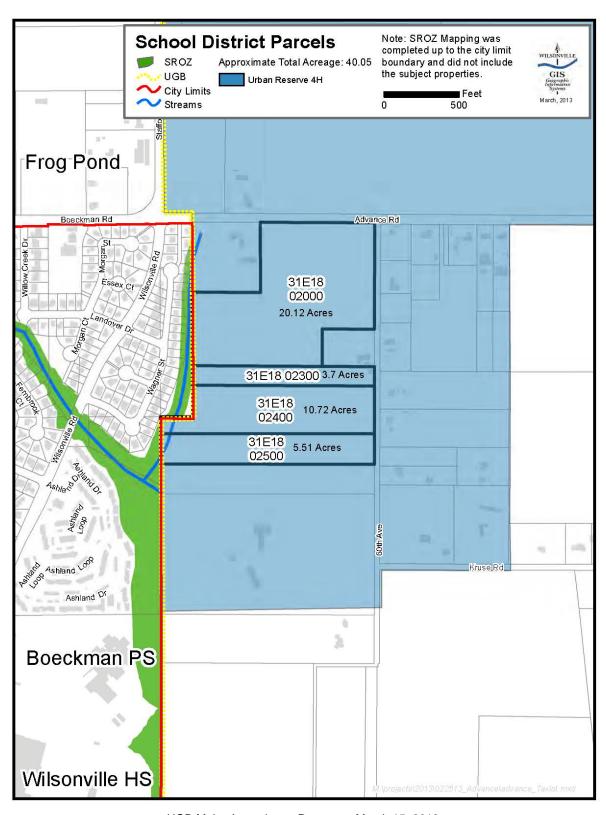
#### **OVERVIEW**

The West Linn-Wilsonville School District, in coordination with the city of Wilsonville, requests an adjustment of the UGB to include the subject 40-acre site, which is often referred to as the "Advance Road" property (Figure 2). As described in Section III, this site is proposed to be utilized for a primary and middle school campus on the southern 30 acres and a city community park on the northern 10 acres. This site is especially important to the district to address a growing capacity deficit at the middle school level. The capacity shortage is most apparent in the Wilsonville area, but all three of the district's middle schools are presently operating at or over capacity. The need for an additional primary school and community park is expected to become more acute over the short-term.

The West Linn-Wilsonville School District prepared its first long range plan in 1996. It has been updated several times, including a revision that nearing completion (see draft in Appendix A). In anticipation of future residential development and enrollment increases, the district purchased the Advance Road site in 2003 to accommodate forecast needs at the primary and middle school levels. The site was selected because of its proximity to the city of Wilsonville, accessibility to students living in the city and unincorporated portions of the district, and flat topography to accommodate athletic fields and minimize construction costs.

The city and district have a long history of collaborating to gain maximum efficiency of park and school land for the benefit of district athletics and city recreation programs. This cooperation continues with the Advance Road site. The city and district jointly developed a concept plan for the property, which culminated with the "Advance Road Site Report" in August 2010. A copy of the report is provided in Appendix B. The district and the city analyzed the feasibility of providing urban services and facilities, including a traffic report. A preferred conceptual site plan was developed as part of this analysis (Figure 3).

Figure 2 – Site Map



Advance Road Public Park soccer -60th-Avenue Middle School Primary School approx. S.R.O.Z. track/soccer soccer Option 1A
Public Park
at North

Figure 3 – Preferred Site Master Plan

Master Plan

Dull Olson Weekes Architects

Advance Road School/Park Site

West-Linn - Wilsonville School District City of Wilsonville Kruse Road

26 April 2010

#### SECTION III: BACKGROUND INFORMATION

#### **SITE INFORMATION**

The site, which consists of four tax lots, is located within unincorporated Clackamas County on the south side of Advance Road, immediately east of the Wilsonville city limit, and west of 60<sup>th</sup> Avenue. The property has frontage on both roads (Figure 4). The entire property is zoned EFU (Exclusive Farm Use) by Clackamas County. The minimum parcel size in the EFU Zone is 80 acres. It is located within Metro Urban Reserve Area 4H, which includes the entire property plus properties to the south, east, and on the north side of Advance Road (Figure 2).

The property is not actively farmed. The northern portion (TL 2000) is an open field, and the southern portion contained an old Filbert orchard, which was recently removed due to age and disease (TL 2300, 2400 and 2500). According to the Clackamas County Planning Department, Tax Lot 2000 is a legally separate parcel, and the remaining tax lots constitute one additional legal parcel.

Traversing the west property line of the site is the east fork of the headwaters of Meridian Creek. Meridian Creek is an intermittent stream with a shallow gradient at the northern end, becoming a steep sided ravine heading south toward the Willamette River. Areas north of Boeckman Road and Advance Road provide the surface runoff for the creek. Culverts under the road convey the water south.

The vegetation in the area is mostly Douglas-fir with alder, and Big-leaf maple as the deciduous component. The understory is disturbed and mostly comprised of sword fern, vine maple, Himalayan blackberry, and English ivy. Meridian Creek is considered a wildlife corridor for large and small mammals, including deer, coyote, raccoon, possum, squirrel, and chipmunk. The creek is a fish bearing stream, with the lower reaches adjacent to the Willamette River containing Cutthroat trout and Coho salmon.

The portion of the stream and associated riparian area, which is currently in the city is regulated under Wilsonville's Significant Resource Overlay Zone (SROZ) and is considered a significant Statewide Planning Goal 5 Natural Resource. Following annexation and rezoning, the SROZ area is anticipated to include the slopes adjacent to the creek extending from the 2- year bank full stage or wetland edge to top of bank or 50 feet, whichever is greater.

#### VICINITY INFORMATION

The zoning and land use for the properties in the vicinity of the proposed site are summarized in Table 1 and shown in Figure 4. Although the site is adjacent to EFU land to the north, east, and south, there is no significant agricultural use in the immediate vicinity. Larger parcels in the area are generally grassland with no active farm operations. Several small-scale agricultural uses, such as nursery stock and Christmas trees, are found on a few rural acreages of five acres or less. An established single family residential subdivision is on the west side of Meridian Creek within the Wilsonville city limits.

Figure 4 - Property and Vicinity Description

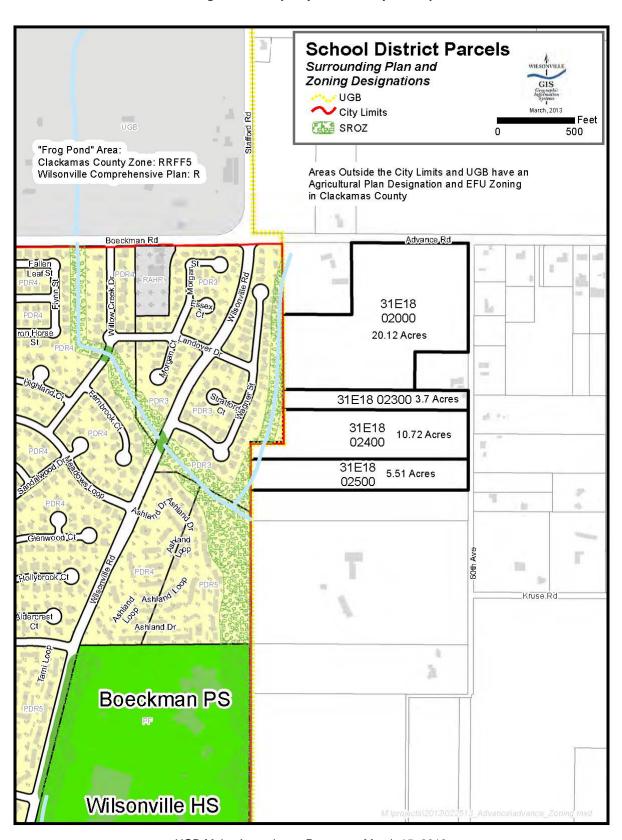


Table 1
Zoning and Land Use Summary

PARCELS	ZONE DESIGNATION	LAND USE	METRO DESIGNATION
Subject Property	Clackamas Co. EFU	Open field and riparian area on extreme western edge	Urban Reserve Area 4H
North	Clackamas Co. EFU	Unfarmed land and rural residences	Urban Reserve Area 4H
East	Clackamas Co. EFU	Rural residences and minor agricultural use	Urban Reserve Area 4H
South	Clackamas Co. EFU	Rural residences and minor agricultural use	Urban Reserve Area 4H
West	Wilsonville PDR-3*	Single family residential	-

<sup>\*</sup>PDR-3: Planned Development Residential 3 (avg. lot size of 7,000 sq. ft.)

#### **PUBLIC FACILITIES AND SERVICES**

Urban facilities and services are available or can be made available working with the city of Wilsonville and Tualatin Valley Fire and Rescue (TVFR).

#### Water

The Advance Road site will be serviced by an existing 12-inch water main located in Advance Road at the edge of the city limits (Figure 5). A water system analysis would need to be performed to show that fire flows to the project site are in compliance with the Public Works and Tualatin Valley Fire and Rescue Standards. Preliminary analysis by the City indicates Upsizing of water mains will not be required, however a second connection to existing water mains may be required to provide adequate fire flows. One factor that helps reduce the overall impact of a school on municipal water systems is that the maximum demand for the school is concentrated during the middle of the day, whereas residential demand is higher in the early morning and evening when more people are at home.

**School District Parcels** Proximity of Water Infrastructure Water UGB City Limits Feet 500 31E18 02000 31E18 02300 31E18 02400 31E18 h Wilsonville HS

Figure 5 – Water System

#### **Sanitary Sewer**

The existing sanitary sewer system has adequate capacity to serve the proposed school campus and community park (Figure 6). However, the city does not currently have sufficient line capacity to serve all of the Advance Road UR 4H and the Frog Pond site (within the UGB on the northwest corner of SW Stafford and SW Boeckman Roads). To address this issue, the city has hired a consultant to evaluate the sanitary sewer system and determine how these future growth areas could be best served. The city also intends to apply for a Metro grant to help finance a concept planning effort for Frog Pond and Advance Road (UR 4H). Similar to water, the highest demand for the school generally occurs at a different time of the day compared to residential uses.

Based on discussions with the city's public works staff, there appear to be several alternatives for providing sanitary sewer service to the site. The alternative selected will largely depend upon the timing of development of the subject site and the surrounding area.

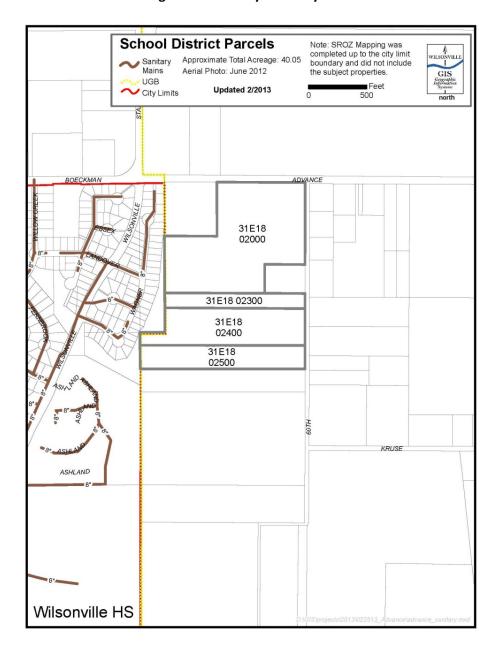


Figure 6 - Sanitary Sewer System

#### **Storm Water Drainage**

The Advance Road site straddles land located in both the Meridian Creek drainage basin and a small, unnamed drainage basin located southeast of the site. Storm drainage from the site will be directed to Meridian Creek, and connection with other storm water facilities will not be necessary (Figure 7). Storm water flows from the developed site will conform with city standards for both water quantity and water quantity. There will be no storm water system capacity issues which cannot be resolved at the design and construction stages.

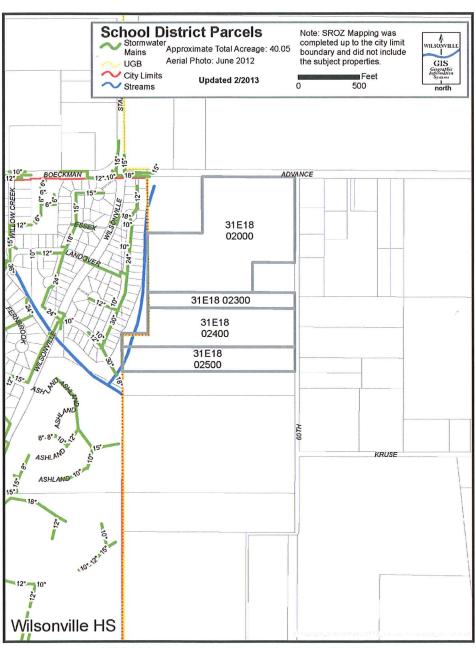


Figure 7 – Storm Water System

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#### **Transportation**

#### **Major Streets**

The City of Wilsonville 2003 Transportation Systems Plan (TSP) was partially updated in 2009 (Figure 8), and a current TSP update is nearing completion. It designates Boeckman Road (the west extension of Advance Road) as a Minor Arterial west of Wilsonville Road. Wilsonville Road is designated as a minor arterial. East of Wilsonville Road, outside of the city limits, Advance Road and Stafford Road are designated as minor arterials and proposed bikeways in the 2001 Clackamas County TSP, which is currently being updated. The city and county designations contemplate a three-lane cross section with bike lanes and sidewalks for these streets. The Clackamas County TSP indicates that Stafford Road, from Boeckman Road north to Newland Road, is scheduled for reconstruction and widening within the next 20 years.

A transportation review was conducted by DKS Associates as part of the Advance Road Site Report (Appendix B). The study found that several roadway improvements would be necessary to support a school campus and city park. However, the report did not find that overall traffic capacity would an issue. The development of the school/park site will trigger street improvements along the property street frontages as well as potential off-site improvements to afford safe access for all transportation modes.

#### Pedestrian and Bicycle Facilities

The Wilsonville Bicycle and Pedestrian Master Plan (December 2006), which is an element of the Wilsonville Comprehensive Plan, contains a hierarchy of interconnected trails to serve the community. In the vicinity of the project site, a number of trails are planned. A pathway connection (Community Walkway/Bikeway No. 19, shown in Figure 9) is planned to link Wilsonville Road at the Boeckman Creek Primary School/Wilsonville High School site east across Meridian Creek, north to the subject site. This trail is envisioned to provide an off-street alternative to Wilsonville Road. This multi-modal path would provide bicyclists and pedestrians with valuable connections between educational facilities, sports complexes, and nearby residential neighborhoods. The on-street connections include contiguous sidewalks and bicycle lanes along the existing length of Wilsonville Road west of the project site. Boeckman Road to the west does not currently have bike lanes, but it does have sidewalks on the south side of the street. As the future Frog Pond residential area develops, Boeckman Road will be improved to include on-street bicycle lanes and contiguous sidewalks on both sides.

When the site is developed, the applicable city and county plans and standards will require street improvements along Advance Road and 60<sup>th</sup> Avenue to provide appropriate vehicular, school bus, transit, pedestrian, and bicycle access to the site. Pedestrian and bicycle path connections, in addition to Community Walkway/Bikeway No. 19 may be possible across Meridian Creek to further enhance access between the school site and the residential neighborhoods located immediately west of the site.

Waldo The City of Wilsonville, Oregon Tonquin Rd Clackamas and Washington Counties **Transportation System Plan** Day Rd Morgan Cahalin Rd Eastgate Dr Coffee Creek Commerce Cir Elligsen Rd Clutter St Ridder Rd Washington Co. Owned by Park A Railliage Homesteader Ro Clackamas Co. Canyon Creek Rd Freeman Dr Kahle Hillman Ct Frogpond Ln Malloy Way Frog Pond Boeckman Rd Advance Rd Westfall Rd Tooze Rd 60th Ave Villebois Kruse Rd Camelot St Parkwood Ln Wilsonville Rd Memorial Magnolia Ave 5th St Park PogueLn Parkvien Orhard Dr Willamette **DRAFT** Figure 3: Functional Classification Charbonneau WILSONVILLE Major Arterial County Boundary Minor Arterial UGB Future Minor Arterial City of Wilsonville Fairway Dr GIS Major Collector 👡 🔉 Future Major Collector Minor Collector à \* Future Minor Collector Jun 19 2012 Neighborhood Collector Future Neighborhood Collector Miles 0.5

Figure 8 – Transportation System Plan Designations

Unclassified Road

Figure 9 – Planned Pathway Connections Off-Street Bicycle and Pedestrian System 0 COMMUNITY WALKWAY / BIKEY LOCAL ACCESS TRAIL

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0.25

0.5

#### Transit

The city operates its own transit system, South Metro Area Rapid Transit (SMART). SMART operates fixed lines, shuttles, dial-a-ride services and links to other transit providers in Portland, Salem and Canby (Figure 10). All rides inside the city are free of charge. TriMet operates the Westside Express Service (WES), which is a commuter rail service terminating at SMART Central at Wilsonville Station on Barber Road. WES connects Tigard, Tualatin, and Beaverton via morning and evening commutes Monday through Friday.

SMART busses are staged and prepared to meet WES visitors delivering them to their places of destination in approximately 10 minutes of arriving at SMART Central. SMART bus line 4 is the closest bus service to the subject site, operating Monday – Saturday along Wilsonville Road immediately west of the subject site.

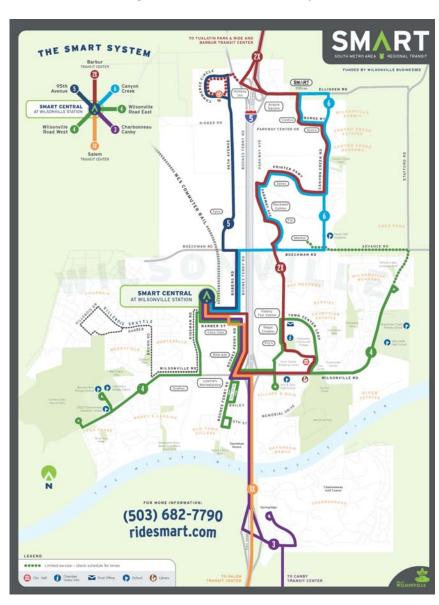


Figure 10 - Transit Service Map

#### **Fire Protection and Emergency Services**

Fire protection and emergency services are provided by Tualatin Valley Fire and Rescue (TVFR). TVFR currently has one operating station (No. 52) on the west side of I-5 and north of Wilsonville Road. A second station (No. 56), which is being rebuilt, is located on Elligsen Road on the east side of I-5. It is scheduled to return to operation in summer 2013. TVFR supports the application (Appendix D).

#### **Police**

The city of Wilsonville contracts with Clackamas County Sheriff's Office to provide law enforcement services to the city. The contract provides the city a dedicated Chief of Police, a School Resource Officer, a detective, and 15 deputies. The city does not anticipate any difficulty providing law enforcement services to this site.

#### Parks and Recreation

The city has a Parks and Recreation Department, which is responsible for senior programs, adult and youth programs, special events, and parks planning and maintenance. The department operates a community center, a variety of parks, and sports fields. The Wilsonville Parks and Recreation Master Plan was created in 2007 to guide how the city provides recreational opportunities for its residents.

One of the "key overarching elements" of the plan is to "continue to provide sports field space for the growing needs of the community." One of more significant projects highlighted in the plan is to "create shared use community/school parks at the Advance Road and Villebois school sites that include shared use gymnasium and sports field space." This was partially implemented with the opening of Lowrie Primary School in Villebois in fall 2012. The city and district now intend to collaborate in a similar manner at the Advance Road site, as described in this application.

The city has three soccer fields and five baseball fields, which are all located in Memorial Park, south of the Town Center. Memorial Park is the city's preeminent recreational facility. Because of limited space, the fields overlap so that only a maximum of five baseball games or three soccer games and one baseball game may be played at any given time. The last of these athletic fields was completed in 1999.

Since the completion of the last sports field, the city's population has risen by over 40% from approximately 14,000 in 2000 to almost 20,000 in 2010 according to the US Census Bureau. The increase in the city's population, coupled with the inability to utilize all athletic fields at once, has contributed to rising pressure to have more athletic fields in the city to accommodate baseball, soccer, lacrosse, and other field sports.

#### **OVERVIEW**

#### **West Linn-Wilsonville School District**

The West Linn-Wilsonville School District includes:

- The city of West Linn;
- The city of Wilsonville (except for Charbonneau and the extreme northwestern portion of the city);
- A small southeastern portion of the city of Tualatin;
- Clackamas County (primarily between West Linn and Wilsonville); and
- A small section of Washington County along the western edge of the District.

The current UGB includes the cities and generally excludes unincorporated land as shown in Figure 11.

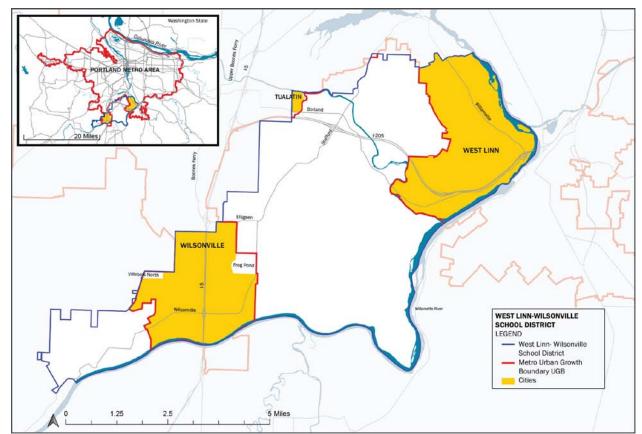


Figure 11 – West Linn-Wilsonville School District

Source: West Linn-Wilsonville School District Long Range Plan

#### West Linn-Wilsonville School District Long Range Plan

To facilitate future planning and to comply with state requirements for fast-growing school districts, the West Linn-Wilsonville School District adopted its first long range plan in April 1996. The plan was subsequently updated several times with the most recent update nearing completion. The School Facilities section of the Long Range Plan is provided in Appendix A. The plan has proven to be a valuable tool that has enabled the district to forecast future school enrollment growth, the distribution of that growth, and the timing and need for new educational facilities.

#### STUDENT ENROLLMENT AND SCHOOL CAPACITY

#### **Existing Conditions**

There are currently nine primary schools, three middle schools, three high schools, and one charter school operated by the district. Of the nine primary schools, Lowrie and Trillium Creek primary schools are new facilities that opened in the fall of 2012. The existing school capacities are shown in Table 2. As shown in the table, school capacity is currently adequate with the exception of the district's three middle schools that are currently over capacity. The capacity problem is especially acute at Wilsonville's Wood Middle School where portable classrooms must remain until permanent facilities are funded and constructed.

#### **Short-Term Student Enrollment Forecast**

The West Linn-Wilsonville School District's Long Range Plan considers potential enrollment and school facility needs based on full residential development within the existing UGB and future UGB expansion areas identified in the Metro growth forecast. In addition to this longer-term evaluation, which estimates the total potential enrollment, the district conducts short-term enrollment forecasts for the upcoming 5-year period. The short-term forecasts are based upon actual residential development projects that are being considered, approved, or under construction.

The district retained a demographer to provide an updated short-term enrollment forecast (Appendix C). The forecast is based upon an evaluation of current enrollment, birth rates (particularly relevant for K-5 enrollment), and residential development projects that are underway or expected to be under construction over the next five years. The demographer interviewed the local planning departments and selected developers to create a residential development forecast.

As can be seen in Appendix C, a significant amount of residential development (over 1,800 units) is anticipated in Wilsonville over the next five years. This development information was then used to forecast enrollment by multiplying the number and type of residences by the observed number of students coming from new residential units. The short-term forecast conducted this year shows that the number of students will continue to climb, and the overall enrollment pressure will be the most pronounced at the middle school level (Table 2). With middle schools generally designed to accommodate approximately 700 students, the middle school enrollment deficit in Wilsonville will be the equivalent of one half of a new school by 2017.

Table 2 – Current Enrollment and Short-Term Forecast

SCHOOL	CAPACITY	EN	IROLLMEN	IT	PROJECTIONS*				
		2010	2011	2012	2013	2014	2015	2016	2017
PRIMAI	RY								
Boeckman	498	640	631	555	549	532	511	496	493
Boones Ferry	633	805	823	531	587	607	601	613	626
Lowrie	450	0	0	407	496	598	665	716	743
Wilsonville Subtotal		1,445	1,454	1,493	1,633	1,738	1,777	1,824	1,863
WV Available Capacity	1,581			88	-52	-157	-196	-243	-282
Bolton	282	332	269	278	256	250	232	214	202
Cedaroak	409	415	413	318	284	283	275	270	257
Stafford	520	543	525	450	358	366	366	364	370
Sunset	479	427	409	285	394	375	368	346	343
Willamette	495	601	609	510	542	542	550	532	528
Trillium Creek	450	0	0	458	433	445	450	441	446
West Linn Subtotal		2,318	2,225	2,299	2,266	2,260	2,239	2,167	2,145
WL Available Capacity	2,635			336	369	375	396	468	490
Subtotal		3,763	3,679	3,792	3,899	3,997	4,016	3,992	4,008
Total Available	4,216			424	317	219	200	224	208
Capacity (K-5)									
MIDDL	E								
Wood		697	706	737	769	818	868	943	990
Avail. Capacity	640			-97	-129	-178	-228	-303	-350
Athey Creek		566	602	607	534	515	481	495	485
Avail. Capacity	624			17	90	109	143	129	139
Rosemont Ridge		695	692	684	732	729	719	721	716
Avail. Capacity	668			-16	-64	-61	-51	-53	-48
Subtotal		1,958	2,000	2,028	2,034	2,062	2,068	2,159	2,191
Total Available Capacity (6-8)	1,932			-96	-102	-130	-136	-227	-259
HIGH									
Wilsonville	1,472	1,049	1,084	1,121	1,123	1,133	1,182	1,164	1,203
West Linn	1,748	1,548	1,506	1,553	1,499	1,472	1,509	1,471	1,449
Art Tech	86	77	86	105	105	105	105	105	105
Subtotal		2,674	2,676	2,779	2,727	2,710	2,795	2,740	2,756
Total Available Capacity (9-12)	3,306			527	579	596	511	566	550
TOTAL		8,395	8,355	8,599	8,660	8,770	8,880	8,891	8,956
Total Available Capacity (K-12)	9,454			855	794	684	574	564	498

<sup>\*</sup> Projections assume that current school attendance areas remain unchanged.

It is worth noting that the primary school enrollment is also expected to increase markedly in the Wilsonville area over the next five years. The district will respond initially by adjusting school attendance areas, but this will only be an interim solution. Ultimately, additional primary school capacity in the Wilsonville area will be required to accommodate new residential growth within the current city limit and the identified Urban Reserve expansion areas.

#### **POTENTIAL SCHOOL SITES**

#### **School Site Size Guidelines**

The district uses school site size guidelines to identify potential school sites. The guidelines are based upon the district's experience regarding the land needs for different school functions. The district has strived to use land efficiently to support local land use planning goals and minimize capital costs. The district size guidelines for primary and middle schools are summarized in Table 3.

Table 3 – School Site Size Guidelines

SCHOOL TYPE	BUILDING FOOTPRINT	PARKING AND ACCESS	ATHLETIC FIELDS PLAYGROUNDS	TOTAL ACRES*	ENROLLMENT
Primary	1.5 – 2	2.5 – 3	6 -10	10-15	450-550 (800 campus**)
Middle	2-3	3-4	12-14	17-21	600-800

<sup>\*</sup> Approximate usable acreage

Usable acreage is defined as land that is relatively flat, free of environmental constraints, and suitable for the school building(s), parking and access, and sports fields and playgrounds. An area of 1.5± acres, located along Meridian Creek, has been identified as being unbuildable due to riparian areas and steep slopes, leaving approximately 38.5 usable acres on the 40-acre site. The net site size will be further reduced to provide the necessary street right-of-way to accommodate the anticipated street frontage improvements.

#### **School Site Selection**

The enrollment growth will continue to be the most pronounced in the Wilsonville portion of the district. Therefore, the best location for new schools will be in this area as well. In a perfect world, schools would be located in the middle of their attendance areas. However, in reality, the geographic distribution of students shifts over time, and suitable school sites are very difficult to secure – especially within the UGB. A major factor influencing site selection is the scarcity of viable alternatives. Small parcel sizes, physical limitations, such as steep slopes and flood plains, unsuitable locations, and zoning restrictions all combine to make school site selection and acquisition a significant challenge.

<sup>\*\*</sup> A primary school campus is an alternative design that would have land needs similar to a middle school. Boones Ferry Primary School is an example of this type of facility.

#### **Analysis of Potential Sites**

#### **Location of Future Growth**

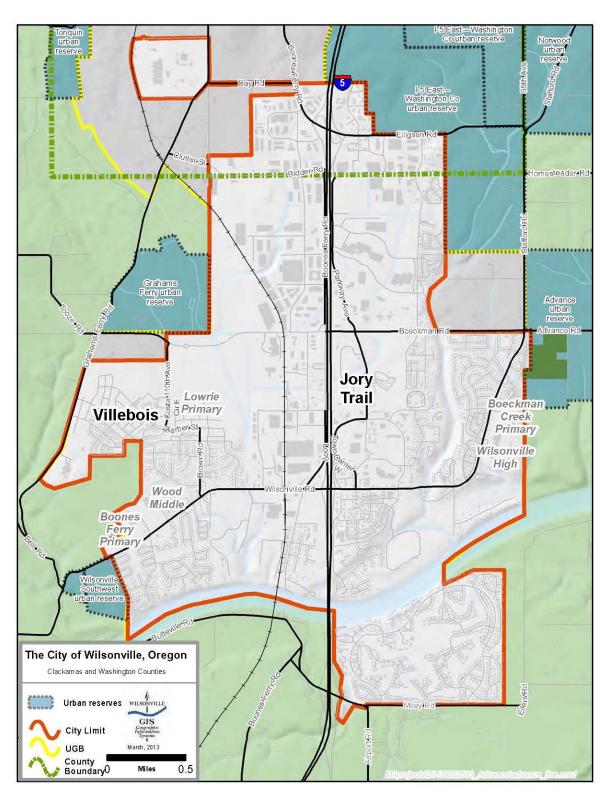
The majority of the residential growth in the city is presently occurring to the west of I-5 in Villebois. In addition, there are significant residential developments, including Jory Trail, located to the north of the city center. Looking to the future, residential development activity will shift to the east as Frog Pond and Advance Road (UR 4H) urbanize. Looking further ahead, there are several Urban Reserve areas located north of Frog Pond, which will contribute to long-term enrollment growth. This includes Norwood (UR 4D) and I-5 East Washington County (UR 4F and 4G). A small UGB expansion is also planned for Wilsonville Southwest (UR 5H), but the city has identified this as its lowest priority for urbanization. Figure 12 illustrates the location of current and future growth areas (note that Grahams Ferry UR is in the Sherwood School District).

#### Site Evaluation and Comparison

Potential school sites selected for evaluation included sites of one or more properties which were vacant or underdeveloped with a minimum total area of 20 acres (the size guideline for a middle school) or larger. This search yielded seven potential sites (Figure 13). In evaluating the potential school sites (summarized in Table 4), the district must consider several variables. The primary considerations include:

- <u>Plan Designation</u> Like all other developments, schools must be located on land that is
  designated to allow the uses proposed. These typically include land that is planned for
  residential or institutional uses. All properties of sufficient size were considered. However,
  residentially designated land is generally favored over commercial/industrial land because
  residential land will typically be located within the residential neighborhoods to be served by
  the school.
- <u>Availability</u> The time required for site acquisition, permitting, and construction must allow completion of the school in time to meet the educational needs of the students in the district. One of the key issues relating to the seven potential sites is that four have owners who have been historically unwilling to sell, and of the four, two are designated for industrial and commercial use. These conditions lead to uncertainty and extra time to either acquire them and/or obtain the necessary plan and zoning amendment.
- <u>Site Character</u> Important characteristics of the site include size, configuration, topography, environmentally sensitive areas, and surrounding land uses.
- <u>Location</u> To provide efficient access to school facilities throughout the district, schools should be located close to where students live. While primary schools may be located relatively close together because of their relatively small attendance areas, middle and high schools should be located farther apart. For the Wilsonville area, which will ultimately have comparable amounts of residential development on both sides of I-5, it is important to "balance" the Wood MS facility with a middle school in the eastern side of the city. This also provides better access for students living in Clackamas County.
- <u>Urban Facilities, Services, and Transportation</u> The availability of water, sanitary sewer, storm water facilities, and multi-modal transportation improvements are essential to successfully operate a school.

**Figure 12 Primary Growth Areas** 



The City of Wilsonville, Oregon Clackamas and Washington Counties Vacant Residential > 20 Acres Vacant Industrial > 20 Acres City Limit UGB County Boundary March, 2013 School District Property 0 Miles 0.25 Approx. 32 Acres lomesteader-Rd-Approx. 178 Acres Approx. 28 Acres Approx. 6 122 Acres Approx. 22 Acres Approx. 28 Acres

Figure 13 – Potentially Available Sites in the Wilsonville Area

Table 4 Site Evaluation and Comparison

SITE*	RATING	PLAN DESIGNATION	AVAILABILITY	SITE CHARACTER	LOCATION	URBAN FACILITIES, SERVICES & TRANSPORTATION	COMMENTS
1	Poor	Residential – Village	Not available. This entire area is part of the Villebois Village Master Plan. One primary school was planned, and this school (Lowrie PS) is now open. No other land is available.	This 122-acresite is within the UGB and most of it is annexed. There are several older homes, but the area is being developed with single and multi-family residences, small mixed-use commercial center, and open spaces.	Not well suited for primary or middle school use because of the close proximity to Lowrie PS and Wood MS and its location near the western edge of the district. Middle school capacity is needed on the east side of I-5.	Services and facilities are available, with the exception of the northern portion of this area. However, the planning and design would need to be significantly reconfigured to change the master plan for a school.	This site would be an extremely poor option because the Villebois Village plan is well established making it impractical to amend and the site is too close to Wood MS and the western edge of the district.
2	Poor	Residential	Possibly available. The Bernert/Young property is within the city of Wilsonville and is planned for residential development, but the owner has not been willing to sell.	The entire 28-acre site continues to be in agricultural use. Some of the property is environmentally constrained (SROZ). It may be of sufficient size to support a primary/middle school campus, but not large enough for the addition of a community park.	Poor location because of its close proximity to Boones Ferry PS and Wood MS. Middle school capacity is needed on the east side of I-5 to more conveniently accommodate students living in the east side of Wilsonville and in Clackamas County.	Services and facilities are available.	Condemnation would probably be necessary to purchase it, the site is not large enough to support a school campus and community park. More important, its location is too close to existing primary and middle schools.
3	Poor	Industrial	Not available. The Elligsen property is within the city and is planned for industrial or commercial development. In addition, the owner has not been willing to sell at a reasonable, market-based price.	This 32-acre site is flat and developable. It may be of sufficient size to support a joint primary/middle school campus and a community park.	With its location next to I-5, surrounded by commercial and industrial uses and near the northern edge of the district, this site is a poor candidate for a school or community park.	Services and facilities are available.	Condemnation would probably be necessary to purchase the property. Potentially adequate size for a primary/middle school campus, but not a community park. Most important, it is an extremely poor candidate due to its isolation from the residential areas it must serve. Intended primarily for industrial or commercial use.
4	Poor	Industrial	Not available. Mentor Graphics property is within the city and is planned for industrial development. In addition, it is being held by the company for future expansion and the owner is not willing to sell.	This 28-acre site is flat and developable. It may be of sufficient size to support a joint primary/middle school campus and a community park. Some of the property is environmentally constrained (SROZ) and the addition of a community park may not be possible.	With industrial/commercial development to the north and I-5 not far to the west, this site is not as accessible to residential neighborhoods as others.	Services and facilities are available.	Condemnation would probably be necessary to purchase the property. May not be large enough for a school campus, and clearly not sufficient to include a community park. It is somewhat isolated from the residential areas it must serve. Intended primarily for industrial or commercial use.
5	Poor	Residential	Possibly available. Mentor Graphics property is within the city and is planned for residential development. However, it is being held by the company for future expansion and the owner is not willing to sell.	This 22-acre site has an irregular shape along with a wooded area, which would make it difficult to accommodate a middle school. A campus including a primary school and community park would not be possible.	This has a central location on the east side of I-5. However, providing appropriate access and a compatible relationship with surrounding residential development could pose some difficulties.	Services and facilities are available.	Condemnation would probably be necessary to purchase the property. Potentially adequate for a middle school, but would not be capable of accommodating a school campus and community park.
6	Fair	Rural Residential (Clackamas Co.) but within the UGB and planned primarily for urban residential use.	Available. Within the UGB but not the city limits because a concept plan must be completed first. Although the district owns a 25-acre site, it will not be available to develop for at least several years.	The majority of Frog Pond (178 acres) is developable. The district currently owns 25 acres in this area. Due to its irregular shape, the district regards this as a potential primary school site only. The district property would have no room for a middle school or community park.	Good location on the east side of I-5 to serve future residential growth within Frog Pond and the Urban Reserve areas to the north.	Sufficient capacity is available to serve the existing district property. However, the city is currently evaluating public utility needs to support an upcoming concept planning effort for Frog Pond (and UR 4H). To provide optimal local circulation and efficient utility systems, this plan must be completed before any properties in Frog Pond are urbanized. The location and configuration of the district property require its inclusion as part of the larger concept planning effort to appropriately provide streets, utilities, open space, etc. for the entire area.	The two primary issues are: 1) property size and configuration; and 2) timing. At 25 acres, the district would need additional property to create a primary/middle school campus. The configuration with 2 halves connected at a property corner makes a campus arrangement impossible. Timing is the second major issue. The city has submitted a Metro grant request to fund a concept plan for the area, which will take about 2 years to complete (longer if a grant is not forthcoming). When the district property was purchased, a concept plan was expected to occur shortly thereafter. The district intends to retain the site for a potential future primary school.
7	Good	Agriculture (Clackamas Co.), but planned for future residential development.	Within UR 4H but not the UGB or city limit.	Most of this 40-acre site is flat and developable with sufficient usable acreage to provide a primary/middle school campus plus a community park.	Good location east of I-5 to serve existing and future residential development in Wilsonville. Complementary location to Wood MS located on the west side of I-5.	Services and facilities are available to serve this site. Because it is defined by existing roads and Meridian Creek, a concept plan was prepared for this site without involving the remainder of UR 4H. Concept planning for UR 4H is proposed to occur with Frog Pond a noted above.	Clearly the best of the alternative sites considering all the factors. Good timing because a concept plan is completed for the site. It is a perfect site to efficiently accommodate a primary/middle school campus and community park. Development of this site will not impair efficient urbanization of the surrounding UR 4H. Multi-modal access improvements are planned.

<sup>\*</sup> See Figure 13

#### **Conclusion**

The location of existing schools and their associated attendance areas leaves the eastern portion of Wilsonville as the only general area that makes sense in the context of Metro, Clackamas County, and Wilsonville planning directives. All things considered, the Advance Road site is the most desirable location for the primary and middle school campus and community park. The site represents a logical middle school location to complement Wood Middle School on the west side of I-5. The property is relatively self-contained by two roadways (Advance Road and 60<sup>th</sup> Avenue) and the Meridian Creek riparian corridor and existing urban development in the city, enabling the creation of a concept plan that is separate from the remainder of UR 4H.

The only other candidate site with reasonable potential is the Frog Pond area. The primary problems here revolve around property size/configuration and timing. At 25 acres, this site does not have sufficient land area for a primary/middle school campus. Perhaps more important, the configuration, with the two halves of the property touching at one corner, does not allow a cohesive arrangement of school improvements and access. In addition, a community park would not be possible on this property.

The uncertain timing associated with the necessary concept planning for Frog Pond is another major issue. When the district purchased the property prior to 2002, the housing market was booming, and a concept plan was expected to be completed shortly thereafter. A concept planning effort was initiated by the developers in Frog Pond, but when the market cooled, the concept plan evaporated. The city now hopes to re-initiate the concept planning work, but it is contingent on receiving a grant from Metro. The best case would be plan completion in approximately two years. However, this will be longer if funding is not available.

These considerations lead the district to conclude that the Advance Road site is clearly the best option available. Frog Pond, and district property in particular, is best suited as a potential future primary school site to accommodate anticipated enrollment growth coming from Frog Pond and the Urban Reserve areas to the north.

#### WILSONVILLE PARKS AND RECREATION MASTER PLAN

The Wilsonville Parks and Recreation Master Plan was completed in 2007. The primary goal of the plan is to keep pace with community growth and continue to provide quality parks throughout the city. Working cooperatively with the school district is a consistent theme throughout the plan. A key finding in the plan notes the demand for additional athletic fields and areas for more passive activities will increase as the city grows. Creating "school parks", which include design features and amenities to facilitate harmonious sharing of facilities for school and city use, is a major component of the plan. Significant projects identified in the plan include creating "... shared use community parks at the Advance Road and Villebois school sites that include shared use gymnasium and sports field space." The Villebois project has been completed with the opening of Lowrie Primary School in 2012. Both outdoor and indoor (e.g., gymnasiums) facilities are being shared as contemplated in the master plan.

A school community park is identified in the plan on the Advance Road site (Figure 3: Parks System Map and project P18 in Chapter 3 of the master plan). The city and district intend to create a school community park as described in the plan. Not only will this be more economical to build and maintain, it will maximize efficient use of land by sharing outdoor areas, indoor facilities, parking, and access.

#### SECTION V: APPLICABLE REVIEW CRITERIA

The criteria for a major UGB amendment are contained in Metro Code 3.01.020. The criteria (shown in *italic*) and district analysis follow.

# Title 14: Urban Growth Boundary 3.07.1440 Major Amendments – Criteria

A. The purpose of the major amendment process is to provide a mechanism to address needs for land that cannot wait until the next analysis of buildable land supply under ORS 197.299. Land may be added to the UGB under sections 3.07.1430 and 3.07.1440 only for public facilities and services, public schools, natural areas and other non-housing needs and as part of a land trade under subsection D. An applicant under section 3.07.1430 must demonstrate compliance with this purpose and these limitations.

**Response:** Metro is required to evaluate the region's ability to accommodate anticipated residential and employment growth for a 20-year period. This analysis of the buildable land supply will be underway again in 2014, and according to the Metro Code (§3.07.1430 A.) major amendment applications may not be accepted, unless special approval is granted by the Metro Council. As explained in this application, the enrollment pressure at the middle school level is becoming increasingly acute, with a district-wide capacity shortfall roughly equivalent to one half of a middle school expected by 2017 (Table 2, p. 19).

From beginning to end, the process for constructing a new school takes several years to complete. This is because there is a series of steps that must be completed before an identified school facility need can be fulfilled:

- 1. The district must identify facility capacity needs along with the general area to be served.
- 2. The district works with district stakeholders to shape a bond package to take to the voters.
- 3. The district must have a school site that is within the UGB and zoned for development.
- 4. The development plans for the school must be created and permits obtained.
- 5. The school is constructed and opened.

The district has identified the need (Step 1 above) as described in Section IV and is beginning initial conversations with stakeholders (Step 2) about how to finance future school district improvements, including a middle school in Wilsonville. Experience with previous school construction projects suggests that the final three steps will take approximately four years to complete. Waiting to apply for a major amendment in 2015 would lead to a middle school opening until 2019, meaning that the middle school overcrowding will plague the district well into the future.

Wilsonville has a pressing need for additional athletic field space. The number of sports fields has remained constant since 2000 as the city's population has risen by over 40% from approximately 14,000 to over 20,000 residents.

As described in Section IV, potential sites within the UGB/Wilsonville city limit with adequate size for a middle school are not suitable primarily due to location, zoning, and availability. When the land needed to create a school campus and community park is also considered, all of the alternative sites with a residential plan designation are too small (Table 4, p. 24).

B. The applicant shall demonstrate that the proposed amendment to the UGB will provide for an orderly and efficient transition from rural to urban land use and complies with the criteria and factors in subsections B, C, D, E, F and G of section 3.07.1425. The applicant shall also demonstrate that:

**Response:** The factors in subsections B, C, D, and F (there is no subsection G) are addressed under 3.07.1425 below.

1. The proposed uses of the subject land would be compatible, or through measures can be made compatible, with uses of adjacent land;

**Response:** The proposed major amendment site is surrounded by land that is either within the city of Wilsonville or Urban Reserve 4H (Figure 2, p. 4). The land in the city is fully urbanized with single and multi-family residences. The Meridian Creek tributary and SROZ environmental overlay provide a permanent buffer between the subject property and nearby city properties.

The remaining properties within UR 4H are relatively large (2 acres and greater) and the existing homes have substantial setbacks from their respective property boundaries. The conceptual site plan (Figure 3, p.5) places school buildings and major activity areas away from adjoining properties. As is the district's standard practice, it will work closely with surrounding property owners as development plans are created to minimize any potential adverse impacts related to school construction and operation.

While the development of a school site and park would potentially be the first urban development in UR 4H, the regional and local plans anticipate redevelopment of this entire area. The early urban development projects always will cause some tension between existing residents who welcome the change and those who are content with its current rural character. So well-designed solutions to deal with compatibility issues may still feel like "encroachment" to rural residents. The development of the site will include public involvement during the design development and permit approval process, allowing ample opportunity for the neighbors to help address specific compatibility issues. In the long term, establishing the school and park first will provide the opportunity for subsequent urban developments to be oriented and designed to optimize their physical relationship with the school and park. This will allow the Advance Road Urban Reserve properties to "grow up together" compared to inserting a large public facility into an established residential neighborhood.

2. If the amendment would add land for public school facilities, the coordination required by subsection C(5) of section 3.07.1120 of this chapter has been completed;

**Response**: C(5) states: "Provision for the amount of land and improvements needed, if any, for public school facilities sufficient to serve the area added to the UGB in coordination with affected school districts. This requirement includes consideration of any school facility plan prepared in accordance with ORS 195.110." This requirement is satisfied as described in this application. The district has had a long range plan since the mid-90s, and it is completing an update of the plan with a focus on enrollment demands and facility needs. The district and city have been coordinating their planning regarding this site for years as demonstrated by the identification of this site for future school and park use in the West Linn-Wilsonville School District Long Range Plan and the Wilsonville TSP and Parks and Recreation Master Plan.

3. If the amendment would add land for industrial use...

**Response:** Not applicable. No industrial land or development is proposed.

C. If the application was filed under section 3.07.1435, the applicant shall demonstrate that the amendment is consistent with any concept plan for the area developed pursuant to section 3.07.1110 of this chapter.

**Response**: Section 3.07.1435 of the Metro Code applies to expedited procedures for major amendments to add industrial land into the UGB. Therefore, a concept plan is not required by this section. As noted above, this site is identified in applicable district and city plans as a future school/park site. In preparing for its annexation and development the district and city jointly prepared a concept plan for the site as detailed in Appendix B. The city proposes to conduct a concept plan for all of Frog Pond and the Advance Road UR 4H area. This plan will be completed prior to any further UGB expansion in this area.

D. To facilitate implementation of the Metropolitan Greenspaces Master Plan of 1992, the Council may add land to the UGB in a trade that removes a nearly equal amount of land from the UGB. If the Council designates the land to be added for housing, it shall designate an appropriate average density per net developable acre.

**Response**: Not applicable because this application does not propose a land trade.

#### 3.07.1425 Legislative Amendment to the UGB – Criteria

A. This section sets forth the factors and criteria for amendment of the UGB from state law and the Regional Framework Plan. Compliance with this section shall constitute compliance with statewide planning Goal 14 (Urbanization) and the Regional Framework Plan.

**Response**: Compliance with the relevant factors and criteria is demonstrated in this application and therefore, it complies with statewide planning Goal 14 and the Regional Framework Plan.

- B. The Council shall determine whether there is a need to amend the UGB. In determining whether a need exists, the Council may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need. The Council's determination shall be based upon:
  - 1. Demonstrated need to accommodate future urban population, consistent with a 20-year population range forecast coordinated with affected local governments; and

**Response**: As described herein, the need for additional middle school capacity is well documented in the district's Long Range Plan (Appendix A) and Table 4, which shows the existing and projected capacity deficit. The district's three middle schools are currently operating at or over capacity and substantial residential development is occurring or planned in the near-term within the existing UGB. The long-range outlook shows this growth will shift to the east side of the city as Frog Pond, Advance Road (UR 4H) and other Urban Reserve areas (Norwood and I-5 East Washington County) develop. The requested

UGB amendment will allow the district and the city meet current as well as anticipated short- and long-term needs for educational and recreation capacity.

2. Demonstrated need for land suitable to accommodate housing, employment opportunities, livability or uses such as public facilities and services, schools, parks, open space, or any combination of the foregoing in this paragraph; and

**Response**: As documented in Section IV, viable middle school sites are not readily available within the current UGB. The existing 20+ acre sites (Figure 13, p. 23) are not suitable for the reasons summarized in Table 4 (p. 24). The Advance Road site is the best alternative considering:

- Availability and the ability to construct a school on a reasonably predictable schedule once the UGB amendment is approved.
- Site characteristics including sufficient area to provide an efficient primary/middle school campus and community park complex.
- A location that will provide proper distribution of middle schools in Wilsonville. Considering future residential growth in the eastern Wilsonville area, the site is also well positioned to provide primary school capacity in addition to the middle school.
- Urban facilities and services may be planned, designed and provided on a schedule necessary to allow timely provision of much needed middle school capacity.
- 3. A demonstration that any need shown under paragraphs 1 and 2 of this subsection cannot reasonably be accommodated on land already inside the UGB.

**Response**: As described in Section IV and summarized in Figure 13 and Table 4, there are very limited possibilities for locating a middle school within the current UGB to serve the district's target population. A GIS search for potential sites of 20+ acres consisting one or multiple parcels yielded a total of seven possible school sites. Of these, only the Advance Road site has all of the necessary qualities to enable the district to provide a middle school that could relieve the overcrowding at the middle school level. As explained in this application, there are significant advantages associated with combining a primary/middle school campus and community park. When these additional elements are considered, the Advance Road site is the only one that will accommodate this symbiotic combination of uses.

- C. If the Council determines there is a need to amend the UGB, the Council shall evaluate areas designated urban reserve for possible addition to the UGB and shall determine which areas better meet the need considering the following factors:
  - Efficient accommodation of identified land needs;

**Response**: The district and city have identified needs for additional school and park capacity to accommodate current residents and anticipated population growth. The West Linn-Wilsonville School District Long Range Plan in Appendix A documents this growing middle school capacity deficit. Relative to the existing school facilities in the Wilsonville area, the Advance Road site represents an efficient location because:

 The other middle school in Wilsonville (Wood) is located on the west side of I-5, and a second middle school located in the eastern portion of the city will facilitate convenient access for students in Wilsonville and unincorporated Clackamas County to the east.

- City utilities are available to serve this site, which is adjacent to the city limit and only a short distance from utility lines that have sufficient capacity to accommodate a school campus/community park.
- Direct and efficient access will be available via major streets, which are intended to
  accommodate significant motor vehicle, pedestrian, bicycle, and transit needs. In addition, the
  Wilsonville TSP and Parks and Recreation Master Plan call for a pathway connection between
  Wilsonville Road and this site.
- It is in an optimal location to serve future development in UR 4H, Frog Pond, and other designated Urban Reserve areas (Norwood and I-5 East Washington County) to the north.
- Utilizing a 40-acre site to ultimately accommodate two schools and a community park will allow
  much greater efficiency than locating each use on a separate site. The proposed site will allow
  for shared parking and access, more efficient programming for school physical education and
  school/community sports, and reduced operations and maintenance costs. The district and city
  have long history of partnering to maximize public funding of educational and community
  programs.
- Orderly and economic provision of public facilities and services; (Includes: water, waste water, storm water, transportation, police/public safety, fire, parks, schools)

Response: As noted in Section III, sufficient capacity is available to provide urban facilities and services:

- Water and sanitary sewer facilities currently have adequate capacity to serve the site.
- Storm water capacity will be provided by on-site facilities releasing storm water into Meridian Creek according to city standards.
- Transportation facilities have adequate capacity to serve the site. As noted above and in the appendices, improvements will need to be made as the site is developed.
- Police/public safety services can be provided by the city and county.
- Fire/emergency services are available from TVFR.
- Park and recreation capacity will be greatly enhanced to address the significant population growth, which has occurred and will continue.
- School capacity is currently deficient at the middle school level, and additional pressure will be
  felt by the district at the primary and middle school level in the coming years. Securing and
  developing this site will address these short- and long-term issues.
- 3. Comparative environmental, energy, economic and social consequences; and

**Response**: The consequences of bringing this site into the UGB compares favorably with the other candidate sites reviewed in Figure 13 and Table 4.

- Environmental Consequences. Other than the Meridian Creek corridor located on the extreme
  west edge of the site, it is devoid of any environmental constraints. Because of its location
  adjacent to the city, facilities and services can be efficiently provided, and the site is located to
  enable efficient transportation to and from the site for students and park users alike. The
  shared use of the site for schools and a community park allow for efficient use of land and
  reduced impervious surfaces especially with shared access and parking.
- <u>Energy Consequences</u>. As noted above, the site is well-served by transportation facilities. With the development of the site additional improvements will be made to facilitate multi-modal

access to the site, including street improvements, pathway improvements, and potential SMART bus service extension. As the remainder of UR 4H urbanizes, the site will be centrally located within a pedestrian- and bicycle-friendly neighborhood, reducing the need for motorized access to the school campus and the community park.

- Economic Consequences. The cost to develop this property, with its relatively flat topography, access to utilities, and the ability to share common facilities between two schools and a community park, make this site significantly more economical than any of the other potential sites. The cost of providing urban facilities and services are comparable to providing similar levels of service within the existing UGB. As noted in Section III, facilities and services are readily available to the site.
- <u>Social Consequences</u>. Quality education and recreational opportunities are essential elements for building and maintaining successful communities. The proposed UGB expansion site represents a location that can provide equitable access to quality educational and recreational facilities through the district and city of Wilsonville.
- 4. Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on land outside the UGB designated for agriculture or forestry pursuant to a statewide planning goal.

**Response**: As noted in Section III, the surrounding uses within UR 4H do not include significant active farming activity. This relative absence of agricultural value and activity along with proximity to the city of Wilsonville led to its designation as an Urban Reserve rather than a Rural Reserve. The larger parcels typically have grass fields single family residences. Several of the smaller acreages have limited agricultural use, such as nursery stock and Christmas trees. Other farm crops or livestock are not evident on any of the properties surrounding the subject site. As UR 4H is urbanized, the site will be within an urban neighborhood and not on the edge of a more permanent boundary between urban and agricultural activities.

5. Equitable and efficient distribution of housing and employment opportunities throughout the region;

**Response**: This criterion is not directly relevant to the location of school and park facilities. However, the location of schools and a community park on this site will provide equitable and efficient distribution of school and park facilities to serve existing and future residential neighborhoods.

6. Contribution to the purposes of Centers and Corridors;

**Response**: The site is not within a Center or Corridor but, it is near the Wilsonville Town Center, which is zoned to accommodate mixed use development. As a relatively low intensity use, this proposed school campus and community park is well located to support the more intensive uses that are more appropriately situated within the Town Center.

7. Protection of farmland that is most important for the continuation of commercial agriculture in the region;

**Response**: With the designation of the Advance Road area as an Urban Reserve area, Metro and Clackamas County have determined that this area is clearly not critical for the continuation of

commercial agriculture in the region. As noted in this application, there is very little agricultural activity occurring on the properties surrounding the site. Bringing this site into the UGB before the remainder of UR 4H will have no impact upon the future or viability of agriculture in the county or the region.

8. Avoidance of conflict with regionally significant fish and wildlife habitat; and

**Response**: As noted in this application, the property is well-suited for development because it is relatively flat with a minor drainage and environmentally sensitive area along the western edge of the site. The size and shape of the property will allow for development of school facilities, athletic fields, and a community park while keeping all of the identified sensitive areas intact.

9. Clear transition between urban and rural lands, using natural and built features to mark the transition.

**Response**: With its location adjacent to the Wilsonville city limit and its northern and eastern boundary largely defined by public roads, the site will have built features, which will provide a buffer and transition between an urban school campus/community park and nearby rural uses (Figure 2). Because UR 4H extends beyond the site, the significance of such a buffer will disappear as the remainder of this Urban Reserve area is transformed from rural to urban uses.

- D. The Council may consider land not designated urban or rural reserve for possible addition to the UGB only if it determines that:
  - 1. Land designated urban reserve cannot reasonably accommodate the need established pursuant to subsection B of this section; or

**Response**: This criterion is not relevant because the site and surrounding properties to the north, east and south are within an Urban Reserve area.

2. The land is subject to a concept plan approved pursuant to section 3.07.1110 of this chapter, involves no more than 50 acres not designated urban or rural reserve and will help the concept plan area urbanize more efficiently and effectively.

**Response**: This criterion is not relevant because the site and surrounding properties to the north, east and south are within an Urban Reserve area.

E. The Council may not add land designated rural reserve to the UGB.

**Response**: This criterion is not relevant because the site and surrounding properties to the north, east and south are within an Urban Reserve area.

F. The Council may not amend the UGB in such a way that would create an island of urban land outside the UGB or an island of rural land inside the UGB.

**Response**: As noted above, the site and the remaining portion of UR 4H are adjacent to the city of Wilsonville. The transformation of this area from rural to urban represents a logical and methodical way to enlarge an urban area, which will not create an island of urban development outside of the UGB.

# **APPENDICES**

### **APPENDIX A**

West Linn-Wilsonville School District Long Range Plan – Part B

**APPENDIX B**Advance Road Site Report

### **APPENDIX C**

5-Year Projections by "Residence" for West Linn-Wilsonville School District

**APPENDIX D**Service Provider Comments