



## CLACKAMAS COUNTY BOARD OF COMMISSIONERS

### LAND USE HEARING

**12/9/2025**

**11:00 AM**

This public hearing will be conducted in person *and* virtually using the Zoom platform. If you wish to attend in person, the address is:

**Development Services Auditorium, 150 Beavercreek Road, Oregon City**

The Zoom link to the public hearing and details on how to observe and testify online or by telephone are available on our website: <https://www.clackamas.us/meetings/bcc/landuse>.

All interested parties are invited to attend the hearing in person, online or by telephone and will be provided with an opportunity to testify orally, if they so choose. The staff report and drafts of the proposed amendments are available on our website at <https://www.clackamas.us/meetings/bcc/landuse>. Please direct all calls and correspondence to the staff member listed below.

### LAND USE HEARING

**File No.: Z0247-25 & Z0248-25**

**Applicants:** Rose Villa

**Proposal:** This application requests that Clackamas County's Comprehensive Plan land use plan designation, as identified in Comprehensive Plan maps, be changed from Low Density Residential (LDR) to High Density Residential (HDR), and for the zoning designation be changed concurrently from Low Density Residential (LDR) to High Density Residential (HDR) for the subject site. The application also requests the removal of a condition of approval in planning file # Z0148-09-D, which limits the ability for Rose Villa to develop on the east side of SE River Rd. No development is proposed with this application.

**Staff Contact:** Martha Fritzie, Principal Planner, [MFritzie@clackamas.us](mailto:MFritzie@clackamas.us)

*Clackamas County is committed to providing meaningful access and will make reasonable accommodations, modifications, or provide translation, interpretation or other services upon request. Please contact us at least three (3) business days before the meeting at 503-742-4545 or email [Drenhard@clackamas.us](mailto:Drenhard@clackamas.us).*

¿Traducción e interpretación? | Требуется ли вам устный или письменный перевод? | 翻译或口译? | Cần Biên dịch hoặc Phiên dịch? | 번역 또는 통역?



**Land Use Hearing  
Staff Report to the Board of County Commissioners**

---

**File Number(s):** Z0247-25 and Z0248-25, *Comprehensive Plan Map Amendment and Zone Change*

**Staff Contact:** Martha Fritzie, Planning and Zoning, [mfritzie@clackamas.us](mailto:mfritzie@clackamas.us)

**Board of County Commissioners Hearing Date:** December 9, 2025; 11:00AM

---

**PROPOSAL:**

This application requests that Clackamas County's Comprehensive Plan land use plan designation, as identified in Comprehensive Plan maps, be changed from Low Density Residential (LDR) to High Density Residential (HDR), and for the zoning designation be changed concurrently from Low Density Residential (LDR) to High Density Residential (HDR) for the subject site. The application also requests the removal of a condition of approval in planning file # Z0148-09-D, which limits the ability for Rose Villa to develop on the east side of SE River Rd.

No development is proposed with this application. The applicant has been advised by staff that, even if this Comprehensive Plan Map amendment and zone change application is approved, approval of any desired building(s) will require a separate design review application, with consideration of particular aspects such as building design, parking, and landscaping. Design review may also be required for the conversion of an existing building to a new use.

Background: The subject site is located on the southeast corner of SE River Rd and SE Torbank Rd, at 1802 SE Torbank Rd & 13614 SE River Rd. It is directly adjacent to (and across SE River Rd from) the existing Rose Villa senior living campus. The subject site consists of two lots of record (21E02DA, Tax Lots 03400 & 03500) which contain a total of approximately 1.15 acres and have approximately 261 feet of frontage on SE River Rd, a minor arterial, and 200 feet of frontage on SE Torbank Rd, a local street.

The subject site is relatively flat, is outside of a mapped flood hazard area, and has no County-regulated mass-movement or soil hazard areas, stream conservation areas, mapped wetlands, or historic landmarks.

Based on current aerial photography and permit history, Staff has identified the following improvements on the site:

- 1804 SE Torbank Rd (taxlot 3400) contains a duplex, detached garage and a parking lot. In 1968, the county denied a conditional use application for three duplexes on this lot,

but later in 1968 permitted one duplex (2 dwelling units). A large, detached garage was permitted in 1984.

Staff notes that this site also contains a parking lot with at least 30 parking spaces and is unsure when this parking lot was established and what this lot is supporting. Per the county's ZDO regulations, the only parking areas allowed on this property would be those accessory to the uses on the property itself.

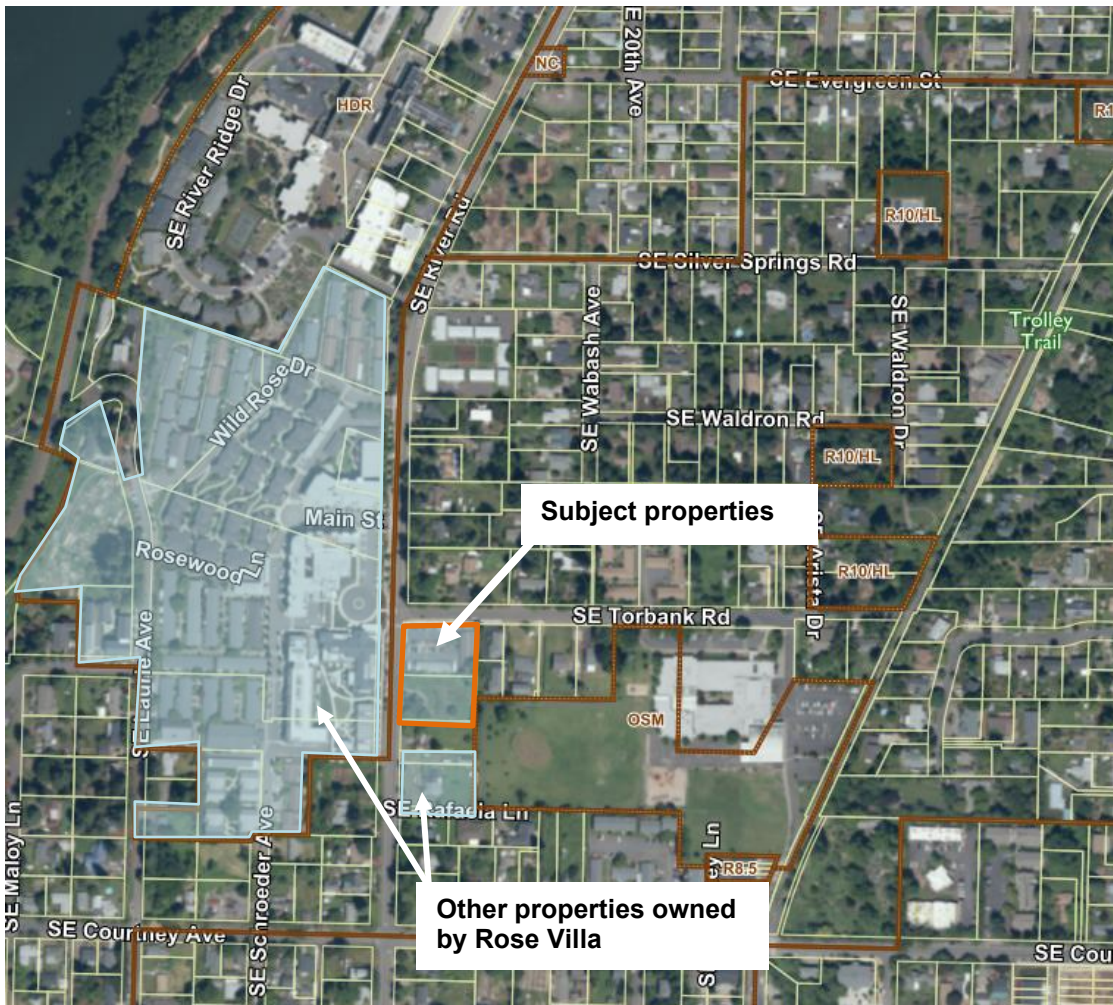
- 13614 SE River Rd (taxlot 3500) is currently vacant. This lot had a structure in recent past, presumably a detached single-family dwelling. Based on recent aerial photos, that structure was recently demolished.

Existing development is served with public water and sewer.

The subject site is currently zoned R-10 (Low Density Residential) and is located in an area zoned for and developed predominantly with residential uses.

- Immediately west of the site, and across SE River Road, are properties owned by Rose Villa Inc. and zoned HDR (High Density Residential). These parcels are developed with the multi-family residential and supporting commercial buildings of a continuing care retirement community. Properties on the west side to SE River Rd and north of the Rose Villa campus are also zoned HDR and developed with other senior housing as well as non-age-restricted multifamily housing.
- Approximately 1/10<sup>th</sup> of a mile east along SE Torbank Rd is the Oak Grove elementary school; its play area/ball fields are located south and west of the school and abut the southeast corner of the subject sites. The school fields are zoned Open Space Management (OSM).
- The remaining area to the north, east, and south subject site is zoned low density residential (R-10) and developed with a mix of single-family dwellings, middle housing or small multifamily developments.

## Subject Property and Vicinity



Source: Clackamas County GIS, PlanMap

Development of the current Rose Villa senior living campus has been approved through a series of land use actions, including design review applications and modifications over the last two decades. Because this senior living campus has been focused on the west side of SE River Rd, only one of these past land use actions directly affects the subject site - file Z0148-09-D.

Z0148-09-D: In 2009, the county approved a “master plan” for a multi-phased campus for Rose Villa on the west side of River Rd. This approval included the following finding:

*Access for the site, as illustrated and described in the master plan documents, is generally acceptable to Engineering staff. Staff has agreed to the proposed access scenario, which required a deviation from County standards for the multiple direct accesses to River Road, several of which also do not meet access spacing guidelines. This deviation was determined to be appropriate mainly due to the applicant's agreement to initially scale down and eventually eliminate operations on the easterly side of River Road. The anticipated safety improvement, resulting from fewer crossings of River Road by pedestrians and vehicles, is the principal reason additional accesses will be recommended for approval to River Road.*

And the following condition:

- 6) *The applicant shall meet or exceed the plans, goals, and time lines associated with the elimination of the East Property Operations, provided in the narrative on page eight of the June 2, 2009, submittal.*

The “submittal” referenced in this condition specifically identifies the property on the corner of SE River and SE Torbank, one of the properties involved in this current application.

As part of this application, the applicant is requesting removal of the condition noted above (specifically condition #6, file Z0148-09-D), so that Rose Villa may develop the subject site with additional senior housing as part of the larger campus. The request is based on an analysis of the current safety of the transportation system and on access and pedestrian facility changes that have occurred in the immediate area since the imposition of the referenced condition.

These applications are subject to the criteria and processes outlined in the county’s Comprehensive Plan and Zoning & Development Ordinance (ZDO), as well as the Statewide Planning Goals. Based on the findings detailed in the Planning Commission Staff Report (attached), Staff finds that the proposal meets all applicable criteria both for a Comprehensive Plan map amendment and zone change from the Low Density Residential/R-10 designation to a High Density Residential (HDR) designation. Staff also finds that the removal of the condition in file Z0148-09-D that limits the ability of Rose Villa to develop on the east side of SE River Rd. is warranted.

---

**RELATED PRIOR BCC ACTION:**

None

---

**PLANNING COMMISSION ACTION:**

A public hearing was held on November 24, 2025, for Planning Commission consideration of the applications and the staff recommendation. The applicant team was the only party who provided testimony at the Planning Commission hearing.

The Planning Commission voted unanimously (8-0) to recommend approval of Z0247-25 & Z0248-25, as proposed.

Draft minutes of the Planning Commission hearing are attached.

---

**CPO AND HAMLET RECOMMENDATIONS:**

The local Community Planning Organization (CPO) - the Oak Grove Community Council CPO – has not provided any comments regarding this application.

---

**SIGNIFICANT ISSUES:**

At its November 24<sup>th</sup> hearing, the Planning Commission was supportive of the proposal and of the prospect for more housing to serve seniors. No significant issues were discussed.

---

**STAFF RECOMMENDATION:**

Staff recommends **APPROVAL** of files Z0247-25 and Z0248-25, the Comprehensive Plan Map amendment from Low Density Residential (LDR) to High Density Residential (HDR), and corresponding zone change from Urban Low Density Residential (R-10) to High Density Residential (HDR), as also recommended by the Planning Commission.

Subject to the recommended conditions of approval.

1. Planning file Z0148-09-D is hereby amended and condition of approval #6 removed:  
*The applicant shall meet or exceed the plans, goals, and time lines associated with the elimination of the East Property Operations, provided in the narrative on page eight of the June 2, 2009, submittal.*
2. The Clackamas County Comprehensive Plan Map 4-6, *North Urban Area Land Use Plan*, and all other maps of the Comprehensive Plan that include the subject properties (taxlot 21E02DA03400, with situs address 1802 SE Torbank Rd and taxlot 21E02DA03400, with situs address 13614 SE River Rd) shall be amended to show the subject property as having a Comprehensive Plan land use designation of High Density Residential (HDR).
3. The Clackamas County *North Urban Area Zoning* map shall be amended to show the subject properties as being in the High Density Residential (HDR) zoning district.

Z0247-25 & Z0248-25

PROPOSED COMP. PLAN MAP  
AMENDMENT & ZONE CHANGE



Public Hearing, Board of County Commissioners  
December 9, 2025; 11:00AM

# PROPOSAL OVERVIEW

- Comprehensive Plan map amendment with corresponding zone change
  - ▣ Low Density Residential (LDR) to High Density Residential (HDR)
  - ▣ Urban Low Density Residential (R-10) to High Density Residential (HDR)
- To facilitate future expansion of the Rose Villa senior living community; senior-oriented housing
- Remove a condition in file Z0148-09-D, which limits the ability for Rose Villa to develop on the east side of SE River Rd
- Comp Plan/zone change would not authorize any development
- Future development would be subject to design review

# SUBJECT SITE



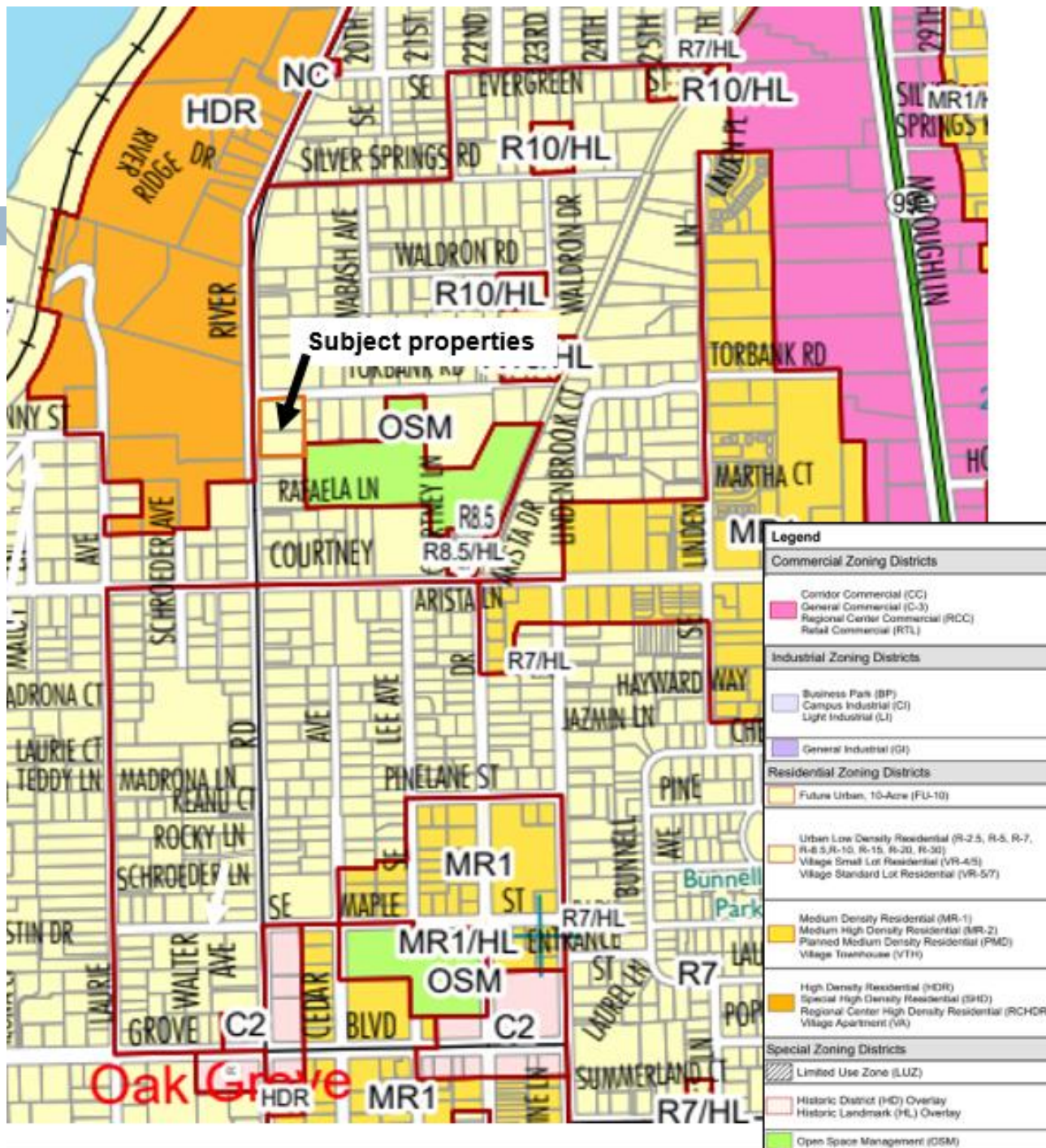
- 1802 SE Torbank Rd & 13614 SE River Rd
- 21E02DA, taxlots 03400 & 03500
- ≈1.15 acres
- SE corner of SE River Rd and SE Torbank Rd
- Zoned R-10

# SUBJECT SITE

- ▣ Relatively flat
- ▣ Developed with duplex, large garage, parking
- ▣ Surrounding uses & zoning:
  - Primarily residential
    - Single-family, middle housing, multifamily - east
    - Senior living campuses – west
  - Elementary school & playing fields



# ZONING



Z0247-25 & Z0248-25 [5]

# NOTICE AND COMMENTS

---

- Notice sent October 20, 2025
- One comment:
  - ▣ County Engineering staff concurring with findings in applicant's traffic study
- CPO: Oak Grove Community Council

# RELEVANT POLICIES AND CRITERIA

## Statewide Planning (SWP) Goals

## County Comprehensive Plan Goals & Policies

- Chapter 2, *Citizen Involvement*
- Chapter 4, *Land Use*
- Chapter 5, *Transportation*
- Chapter 6, *Housing*
- Chapter 11, *The Planning Process*

## Metro Urban Growth Management Functional Plan (UGMFP)

## Zoning & Development Ordinance (ZDO)

- Section 1202, *Zone Changes*
- Section 1307, *Procedures*

# ZDO FINDINGS, 1202.03(A)

- **Section 1202.03(A):** *The proposed zone change is consistent with the applicable goals and policies of the Comprehensive Plan.*
- **Proposal meets all relevant criteria**
  - Procedural and coordination policies and requirements
  - Complies with the Transportation Planning Rule (TPR), SWP Goal 12
  - Supports increased housing choice, variety
  - Meets all requirements for High Density Residential (HDR) designation

# ZDO FINDINGS, 1202.03(B)

- **Section 1202.03(B):** requires demonstration that any needed public services are available and sufficient for development under new zoning designation
  - ▣ Statements of Feasibility – sewer, water, surface water (Oak Lodge)

# ZDO FINDINGS, 1202.03(C) & (D)

- **Section 1202.03(C):** *The transportation system is adequate and will remain adequate with approval of the proposed zone change...*
- **Section 1202.03(D):** *Safety of the transportation system is adequate to serve the level of development anticipated by the zone change.*
- Traffic study submitted by applicant
  - Will not have a significant effect on adequacy or safety of the transportation system

# ZDO FINDINGS, 1202.03(D)

- Supplemental analysis provided
  - To address the safety as it related to the condition of approval in File Z0148-09-D
    - Required Rose Villa to “eliminate” operations on east side of SE River Rd (one of subject properties)
    - Due to access and pedestrian safety concerns
  - Identified changes that have “significantly improved” conditions along River Rd
    - Rose Villa reduced driveway access on west side of road
    - Pedestrian crossing upgraded with flashing beacon
    - Speed on portion of River Rd reduced from 35 to 30 mph
    - All-way stop at Courtney Rd/River Rd intersection
  - Concludes condition is no longer necessary

Z0247-25 & Z0248-25 [11]

# PLANNING COMMISSION (PC) HEARING

- ❑ Public hearing November 24, 2025
- ❑ No public testimony
- ❑ No significant issues
- ❑ Some discussion, concern about pedestrians crossing SE River Rd to amenities on west side campus
- ❑ Recommended approval of Z0247-25 & Z0248-25
  - ▣ Unanimous vote (8-0)

# CONCLUSION

---

- Proposal meets all applicable criteria for Comprehensive Plan map amendment and zone change to High Density Residential (HDR)
- Removal of condition in Z0148-09-D is warranted
- Staff also recommends approval of Z0247-25 & Z0248-25, as proposed
  - Includes the removal of condition #6 in file Z0148-09-D



# QUESTIONS?



Martha Fritzie, (503) 742-4529, [mfritzie@clackamas.us](mailto:mfritzie@clackamas.us)



**PLANNING STAFF REPORT AND RECOMMENDATION TO  
THE PLANNING COMMISSION**

**REPORT DATE:** November 17, 2025

**HEARING DATE:** November 24, 2025 (Agenda Item Time: 6:30 pm)

**PLANNING FILE NOS.:** Z0247-25 and Z0248-25

**PROPOSAL:** A Comprehensive Plan map amendment to change the land use plan designation for the subject site from Low Density Residential (LDR) to High Density Residential (HDR), with a corresponding zone change from Urban Low Density Residential (R-10) to High Density Residential (HDR). The proposal also includes a request to remove a condition in file Z0148-09-D, which limits the ability for Rose Villa to develop on the east side of SE River Rd.

This change is intended to facilitate the future expansion of the Rose Villa senior living community and accommodate additional senior-oriented housing. No development is proposed with this application.

**STAFF CONTACT(S):** Martha Fritzie, (503) 742-4529, [mfritzie@clackamas.us](mailto:mfritzie@clackamas.us)

**LOCATION:** 1802 SE Torbank Rd & 13614 SE River Rd; on the southeast corner of SE River Rd and SE Torbank Rd

T2S, R1E, Section 02DA Tax Lots 03400 & 03500

**APPLICANT(S):** Thuy Cao; Harper Houf Peterson Righellis, Inc

**OWNER(S):** Rose Villa Inc

**SUBJECT PROPERTY AREA:** Approximately 1.15 acres

**CURRENT ZONING:** Urban Low Density Residential (R-10)

**COMPREHENSIVE PLAN DESIGNATION:** Low Density Residential (LDR)

**COMMUNITY PLANNING ORGANIZATION:** ~~Clackamas CPO (inactive)~~ Oak Grove Community Council CPO

**NOTICE TO MORTGAGEE, LIENHOLDER, VENDOR OR SELLER:** ORS Chapter 215 requires that if you receive this notice, it must be promptly forwarded to the purchaser.

**OPPORTUNITY TO REVIEW THE RECORD:** The submitted application is available for review online at [Accela Citizen Access](#). Select the Planning tab and enter the file number to search. Select 'Record Info' and then select 'Attachments' from the dropdown list, where you will find the submitted application. The complete application file is available for inspection at no cost by contacting the Planner listed on the first page of this decision. Copies of all documents may be purchased at the rate of \$2.00 per page for 8.5" x 11" or 11" x 14" documents, \$2.50 per page for 11" x 17" documents, \$3.50 per page for 18" x 24" documents, and \$0.75 per square foot with a \$5.00 minimum for large format documents.

**APPLICABLE APPROVAL CRITERIA:** Statewide Planning Goals; Clackamas County Comprehensive Plan; Metro Urban Growth Management Functional Plan; and Clackamas County Zoning and Development Ordinance (ZDO) Sections 202, 315, 1202, and 1307.

---

## **I. STAFF RECOMMENDATION**

Staff recommends **APPROVAL** of the Comprehensive Plan map amendment and zone change in file nos. Z0247-25 and Z0248-25, subject to the following conditions of approval:

1. Planning file Z0148-09-D is hereby amended and condition of approval #6 removed:  
*The applicant shall meet or exceed the plans, goals, and time lines associated with the elimination of the East Property Operations, provided in the narrative on page eight of the June 2, 2009, submittal.*
  2. The Clackamas County Comprehensive Plan Map 4-6, *North Urban Area Land Use Plan*, and all other maps of the Comprehensive Plan that include the subject properties (taxlot 21E02DA03400, with situs address 1802 SE Torbank Rd and taxlot 21E02DA03400, with situs address 13614 SE River Rd) shall be amended to show the subject property as having a Comprehensive Plan land use designation of High Density Residential (HDR).
  3. The Clackamas County *North Urban Area Zoning* map shall be amended to show the subject property as being in the High Density Residential (HDR) zoning district.
- 

## **II. BACKGROUND**

This application requests that Clackamas County's Comprehensive Plan land use plan designation, as identified in Comprehensive Plan maps, be changed from Low Density Residential (LDR) to High Density Residential (HDR), and for the zoning designation be changed concurrently from Low Density Residential (LDR) to High Density Residential (HDR) for the subject site. The application also requests the removal of a condition of approval in planning file # Z0148-09, which limits the ability for Rose Villa to develop on the east side of SE River Rd.

The application does not itself propose, nor would its approval authorize, any new development. Zoning & Development Ordinance (ZDO) Subsection 1102.01(A) requires that new development in the high-density residential zoning district, receive design review approval, for which the applicant has not yet applied. The applicant has been advised by staff that, even if this Comprehensive Plan Map amendment and zone change application is approved, approval of any desired building(s) will require a separate design review application, with consideration of particular aspects such as building design,

parking, and landscaping. Design review may also be required for the conversion of an existing building to a new use.

**Subject property and surrounding area:** The subject site is located at 1802 SE Torbank Rd & 13614 SE River Rd, on the southeast corner of SE River Rd and SE Torbank Rd and directly adjacent to (and across SE River Rd) from the existing Rose Villa senior living campus. The site consists of two lots of record (21E02DA, Tax Lots 03400 & 03500) which contain a total of approximately 1.15 acres. The site has approximately 261 feet of frontage on SE River Rd, a minor arterial, and 200 feet of frontage on SE Torbank Rd, a local street.

The subject site is relatively flat, is outside of a mapped flood hazard area, and has no County-regulated mass-movement or soil hazard areas, stream conservation areas, mapped wetlands, or historic landmarks.

Although the application notes generally that the “properties are currently developed with residential structures and accessory buildings,” based on current aerial photography and permit history, Staff has identified the following improvements. Existing development is served with public water and sewer.

- 1804 SE Torbank Rd (taxlot 3400) appears to contain a duplex, detached garage and a parking lot. In 1968, the county denied a conditional use application for three duplexes on this lot, but later in 1968 permitted one duplex (2 dwelling units). A large, detached garage was permitted in 1984.

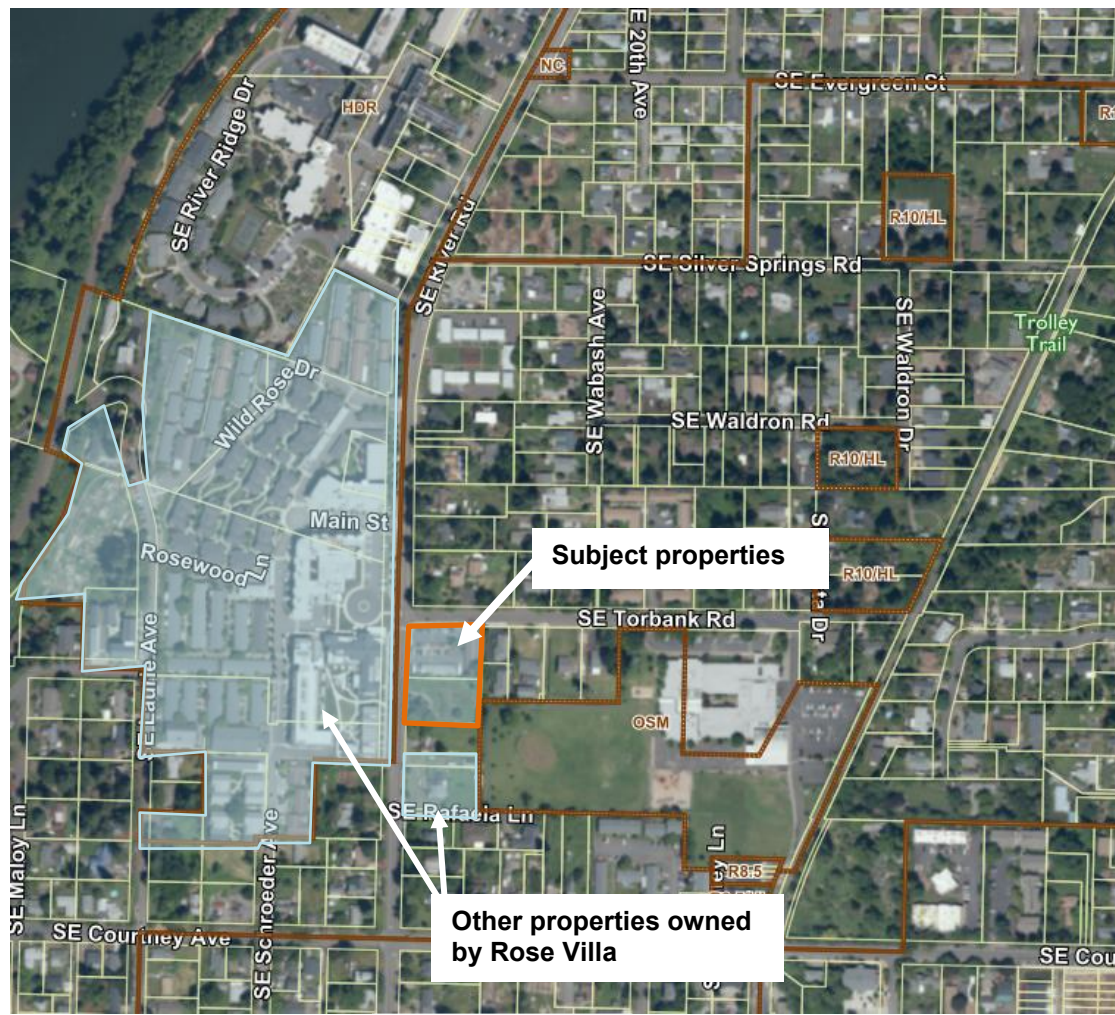
Staff notes that this site also contains a parking lot with at least 30 parking spaces and is unsure when this parking lot was established and what this lot is supporting. Per the county’s ZDO regulations, the only parking areas allowed on this property would be those accessory to the uses on the property itself. Uses, including parking, that are accessory to the senior living campus across SE River Rd are not allowed on this site.

- 13614 SE River Rd (taxlot 3500) appears to be vacant. This lot had a structure in recent past, presumably a detached single-family dwelling. Based on recent aerial photos, that structure was recently demolished.

The subject site is currently zoned R-10 (Low Density Residential), with a corresponding Comprehensive Plan designation of Low Density Residential. The site is located in an area zoned for and developed predominantly with residential uses, ranging from older single-family and multifamily housing, to newer middle housing development, and two large mixed-use senior living campuses directly west of the subject sites - Rose Villa and Willamette View.

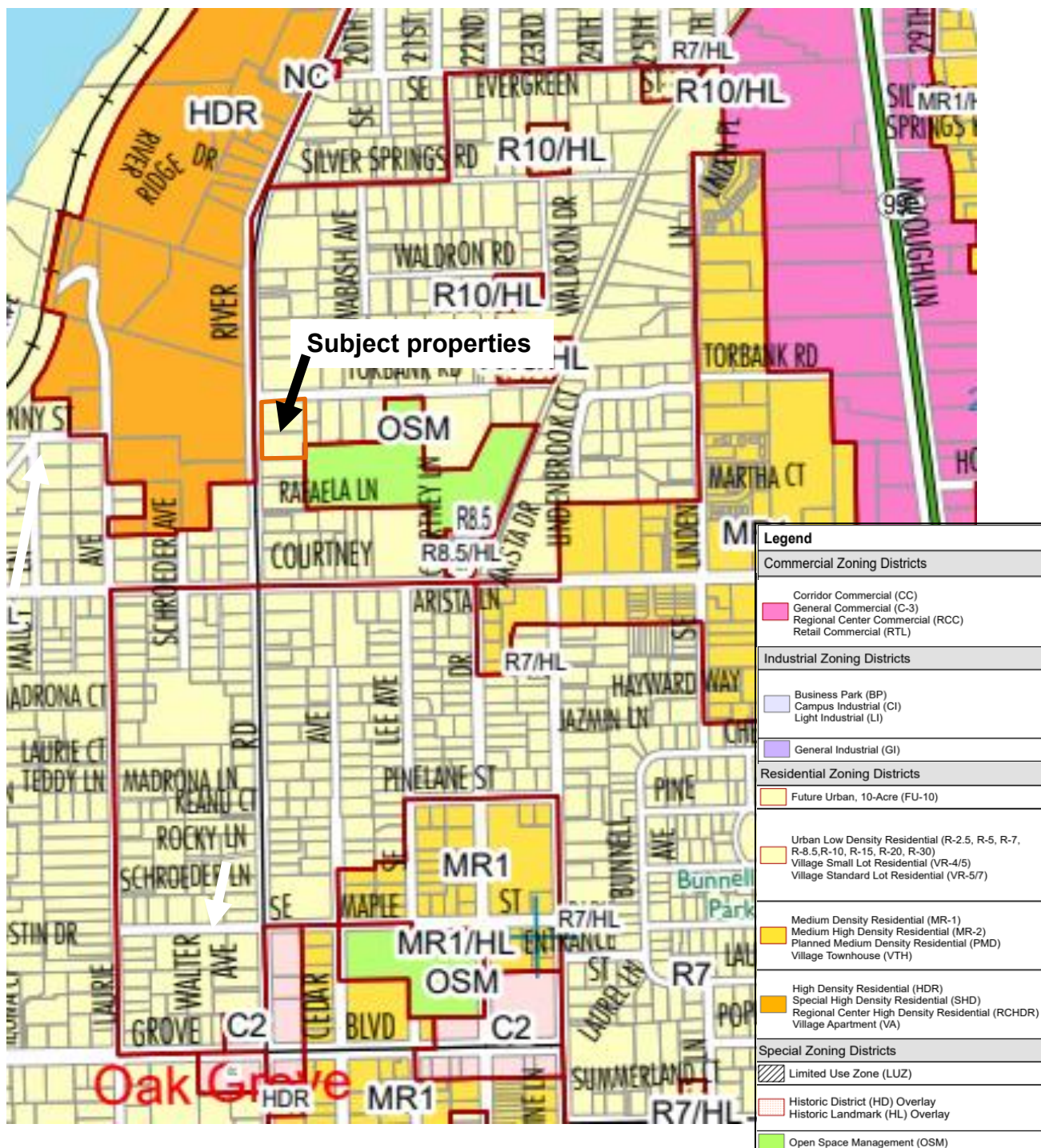
- Immediately west of the site, and across SE River Road, are properties owned by Rose Villa Inc. and zoned HDR (High Density Residential). These parcels are developed with the multi-family residential and supporting commercial buildings of a continuing care retirement community. Properties on the west side to SE River Rd and north of the Rose Villa campus are also zoned HDR and developed with other senior housing as well as non-age-restricted multifamily housing.
- Approximately 1/10<sup>th</sup> of a mile east along SE Torbank Rd is the Oak Grove elementary school; its play area/ball fields are located south and west of the school and abut the southeast corner of the subject sites. The school fields are zoned Open Space Management (OSM).
- The remaining area to the north, east, and south subject site is zoned low density residential (R-10) and developed with a mix of single-family dwellings, middle housing or small multifamily developments.

## Subject Property and Vicinity



Source: Clackamas County GIS, PlanMap

# Subject Properties in Current North Urban Area Zoning Map



### **Land Use History**

Development of the current Rose Villa senior living campus has been approved through a series of land use actions, including design review applications and modifications over the two decades. Because this senior living campus has been focused on the west side of SE River Rd, only one of these past land use actions directly affects the subject site – planning file Z0148-09-D.

Z0148-09-D: In 2009, the county approved a “master plan” for a multi-phased campus for Rose Villa on the west side of River Rd. This approval included the following finding:

*Access for the site, as illustrated and described in the master plan documents, is generally acceptable to Engineering staff. Staff has agreed to the proposed access scenario, which required a deviation from County standards for the multiple direct accesses to River Road, several of which also do not meet access spacing guidelines. This deviation was determined to be appropriate mainly due to the applicant's agreement to initially scale down and eventually eliminate operations on the easterly side of River Road. The anticipated safety improvement, resulting from fewer crossings of River Road by pedestrians and vehicles, is the principal reason additional accesses will be recommended for approval to River Road.*

And the following condition:

- 6) *The applicant shall meet or exceed the plans, goals, and time lines associated with the elimination of the East Property Operations, provided in the narrative on page eight of the June 2, 2009, submittal.*

The “submittal” referenced in this condition specifically identifies the property on the corner of SE River and SE Torbank, one of the properties involved in this current application (see Exhibit 2).

As part of this application, the applicant is requesting removal of the condition noted above (specifically condition #6, file Z0148-09-D), so that Rose Villa may develop the subject site with additional senior housing as part of the larger campus. The request is based on an analysis of the current safety of the transportation system and on access and pedestrian facility changes that have occurred in the immediate area since the imposition of the referenced condition.

### **Service providers:**

1. Sewer: Oak Lodge Sanitary District
2. Water: Oak Lodge Water District
3. Fire Protection: Clackamas RFPD #1

**Noticing:** This application has been processed consistent with the legal noticing requirements in Section 1307, *Procedures*, of the County’s Zoning and Development Ordinance (ZDO) and with state noticing requirements. Specifically, the County has provided notice to interested agencies, local governments and property owners within 300 feet of the subject property consistent with State law and Section 1307 of the ZDO. The notification to property owners, public notices and hearings ensures an opportunity for citizens to participate in the land use process.

**Responses received:** To date, the only comment received has been from the county’s Engineering staff regarding the applicant traffic study and supplemental memorandum. County Engineering staff states that they have reviewed these documents and concur with its findings. See Exhibit 3.

The local Community Planning Organization, the Oak Grove Community Council CPO, has not submitted comments.

### **Public Hearings:**

Two public hearings on the current proposal are scheduled: one before the Planning Commission on November 24, 2025, and another before the Board of County Commissioners (Board) on December 9, 2025. The Planning Commission makes a recommendation to the Board, who will ultimately decide whether the proposal is approved.

---

## **III. FINDINGS**

This application is subject to the following provisions:

- A. Statewide Planning Goals;
- B. Metro Urban Growth Management Functional Plan;
- C. Clackamas County Comprehensive Plan; and
- D. Zoning and Development Ordinance (ZDO) Sections 202, 1202, and 1307.

Staff have reviewed these provisions and the applicant's preliminary findings in conjunction with this proposal. Compliance with the applicable regulations found in each is discussed below. ZDO Sections 202 and 1307 provide only definitions and procedural requirements that do not warrant separate written findings in this report.

### **A. Statewide Planning Goals**

#### **GOAL 1 – CITIZEN INVOLVEMENT**

Statewide Planning Goal 1 calls for “the opportunity for citizens to be involved in all phases of the planning process” and requires the County to have a citizen involvement program with certain features.

*This application only proposes to amend the County's Comprehensive Plan maps and zoning map. Even if approved, the County's existing, State-acknowledged citizen involvement program would not change.*

*ZDO Section 1307, Procedures, contains acknowledged procedures for citizen involvement and public notice of quasi-judicial applications. This application has been processed consistent with those requirements, including providing notice to property owners within 300 feet of the subject property; the Department of Land Conservation and Development (DLCD); and other interested agencies. Notice of the application and its public hearings has also been published in the newspaper and on County websites.*

*Before the Board of County Commissioners can decide on this application, there will have been at least two public hearings with opportunity for interested parties to testify. The public has also been given the opportunity to provide written comments, and all comments provided to date have been included in the record.*

***The relevant requirements of Statewide Planning Goal 1 are satisfied.***

#### **GOAL 2 – LAND USE PLANNING**

Goal 2 requires the County to have and to follow a comprehensive land use plan and implementing regulations. Comprehensive plan provisions and regulations must be consistent with Statewide

Planning Goals, but Goal 2 also provides a process by which exceptions can be made to certain Goals.

*This proposed amendment to the County's Comprehensive Plan maps, including Map 4-06, would not change the County's land use planning process. Even with this amendment, the County will continue to have a comprehensive plan and consistent implementing regulations. This report outlines how this amendment is consistent with applicable policies of the County's acknowledged Comprehensive Plan. The applicant does not request an exception to any statewide planning goal, nor is an exception required for this amendment.*

***The relevant requirements of Statewide Planning Goal 2 are satisfied.***

#### GOAL 3 – AGRICULTURAL LANDS

Goal 3 requires the County to identify farmland, designate it as such on its Comprehensive Plan maps, and zone it Exclusive Farm Use (EFU).

*The County has already satisfied these requirements. This application does not propose to change the Comprehensive Plan or zoning designation of any farmland, nor does it propose a change in any allowed land use in the EFU zone. The subject property is currently zoned for residential development, not agriculture.*

***Statewide Planning Goal 3 is not applicable.***

#### GOAL 4 – FOREST LANDS

Goal 4 requires the County to identify forest lands, designate it as such on Comprehensive Plan maps, and zone it consistently with State rules.

*The County has already satisfied these requirements. This application does not propose to change the Comprehensive Plan or zoning designation of any forest land, nor does it propose a change in any allowed land use in the County's forest zones (i.e., Ag/Forest and Timber). The subject property is currently zoned for residential development, not forest uses.*

***Statewide Planning Goal 4 is not applicable.***

#### GOAL 5 – NATURAL RESOURCES, SCENIC AND HISTORIC AREAS, AND OPEN SPACES

Goal 5 requires the County to adopt programs that will protect an area's natural resources and will conserve scenic, historic, and open space resources for present and future generations. It requires an inventory of natural features, groundwater resources, energy sources, and cultural areas, and encourages the maintenance of inventories of historic resources.

*This proposal would not change the County's acknowledged inventories or programs for the protection of such resources nor would it modify the mapping of any protected resource. As noted previously, the subject site does not contain any identified Goal 5 resources.*

***Statewide Planning Goal 5 is not applicable.***

#### GOAL 6 – AIR, WATER, AND LAND RESOURCES QUALITY

Goal 6 instructs the County to consider the protection of air, water, and land resources from pollution and pollutants when developing its Comprehensive Plan.

*This proposal would not change the County's acknowledged Comprehensive Plan policies or implementing regulations regarding Goal 6 resources, nor would it modify the mapping of any protected resource.*

*The Oak Lodge Sanitary District is the surface water management authority for the subject property. The submitted application includes a Preliminary Statement of Feasibility in which Oak Lodge has determined that adequate surface water treatment and conveyance is already available to serve future residential development of the subject site, or could be made available through improvements completed by the developer or the system owner. The need for any specific stormwater management system improvements will be evaluated during the design review application process required ahead of any actual development of the subject site.*

**The relevant requirements of Statewide Planning Goal 6 are satisfied.**

#### **GOAL 7 – AREAS SUBJECT TO NATURAL HAZARDS**

Goal 7 requires the County to address Oregon's natural hazards.

*This proposal would not change the County's acknowledged Comprehensive Plan policies or implementing regulations regarding natural disasters and hazards, nor would it modify the mapping of any hazard. As noted previously, the subject sites are flat and do not contain any areas with identified Goal 7 hazards.*

**Statewide Planning Goal 7 is not applicable.**

#### **GOAL 8 – RECREATIONAL NEEDS**

Goal 8 requires the County to plan for the recreational needs of its residents and visitors.

*This proposal would not change the County's acknowledged Comprehensive Plan policies or implementing regulations regarding recreational needs and would not modify the mapping of a recreational resource. The subject site does not contain any areas with identified Goal 8 resources.*

**Statewide Planning Goal 8 is not applicable.**

#### **GOAL 9 – ECONOMIC DEVELOPMENT**

The purpose of Goal 9 planning is to provide adequate opportunities throughout Oregon for a variety of economic activities vital to the health, welfare, and prosperity of Oregonians.

*Goal 9 is implemented by Oregon Administrative Rules (OAR) Chapter 660, Division 9. Pursuant to OAR 660-009-0010(1), the requirements of Division 9 are only applicable to areas within urban growth boundaries (UGBs). Goal 9 requires the County's Comprehensive Plan for its urban areas to contain economic analyses and economic development policies. It also requires the Comprehensive Plan to provide "at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses". The County's State-acknowledged Comprehensive Plan already contains the required economic analyses and development policies, which this application does not propose to change.*

**Statewide Planning Goal 9 is not applicable.**

#### **GOAL 10 – HOUSING**

The purpose of Goal 10 is to meet housing needs.

Goal 10 recommends that the County's Comprehensive Plan (including its land use designation maps) "should be developed in a manner that insures the provision of appropriate types and amounts of land" within UGBs for housing; it also advises that areas planned for residential development "be necessary and suitable for housing needs of households of all income levels".

Oregon Administrative Rules (OAR) Chapter 660, Division 7 (Metropolitan Housing) contains the administrative rules for compliance with Goal 10 within the Portland Metropolitan urban area, where the subject property is located. Specifically, subsection 2 of rule 60 states:

"(2) For plan and land use regulation amendments which are subject to OAR 660, division 18, the local jurisdiction shall either:

- (a) Demonstrate through findings that the mix and density standards in this Division are met by the amendment; or
- (b) Make a commitment through the findings associated with the amendment that the jurisdiction will comply with provisions of this Division for mix or density through subsequent plan amendments."

Staff finds the information summarized below and included in the application narrative sufficiently satisfies Goal 10 requirements. The applicant notes, and staff concurs that the proposed zone change "directly supports Goal 10 by enabling a greater number of housing units on a site that is already served by urban services and located within the Metro Urban Growth Boundary" and that the proposal "represents a more efficient use of land that aligns with the intent of Goal 10 to maximize housing production within designated urban areas."

- Based on a site area of 1.15 acres, under its current zoning of R-10, up to five lots could be theoretically created from this site – each of which could be developed with a single-family dwelling or middle housing units. As noted in the application, this site, with HDR zoning may be allowed to develop up to 29 multifamily dwelling units.
- Because this site would be developed as an extension of the Rose Villa campus, the housing built would be specifically designed for seniors, a fast-growing segment of the population.

This proposal will further local and regional efforts to expand housing choice, density, and affordability, particularly for seniors, thus further Goal 10.

**This proposal is consistent with Statewide Planning Goal 10.**

#### GOAL 11 – PUBLIC FACILITIES AND SERVICES

The purpose of Goal 11 is to ensure that local governments plan and develop a timely, orderly, and efficient arrangement of public facilities and services to serve as a framework for urban and rural development. Goal 11 is implemented by OAR Chapter 660, Division 11.

The applicant has provided Statements of Feasibility from the subject site's sewer, water, and stormwater service providers. The statements attest that there are already adequate services available to the properties to accommodate expected future development, or that adequate services could be made available concurrent with future development, if the proposal is approved.

**The relevant portions of Statewide Planning Goal 11 are satisfied.**

## GOAL 12 – TRANSPORTATION

The purpose of Goal 12 is to provide and encourage a safe, convenient, and economic transportation system. It requires the County to create a transportation system plan (TSP) that takes into account all relevant modes of transportation.

*Goal 12 is implemented by OAR chapter 660, division 12, commonly referred to as the Transportation Planning Rule (TPR). When an amendment to the County's Comprehensive Plan map or zoning map is proposed, OAR 660-012-0060 requires an analysis of whether the proposed amendment would "significantly affect" an existing or planned transportation facility, and whether it is necessary to update transportation facility plans to accommodate such effects. The TPR defines what it means to "significantly affect" a transportation facility.*

*The applicant has provided a traffic study and supplemental information, prepared by a licensed engineering firm, Lancaster Mobley, and dated June 11, 2025 and September 12, 2025. The traffic analyses address TPR requirements and include a comparison of the reasonable worst-case traffic impacts caused by potential development of the subject property under the property's current zoning.*

*Key conclusions from this analysis include:*

- "... the proposed zone change is estimated to generate an additional 9 morning peak hour, 12 evening peak hour trips, and 152 weekday trips compared with the existing zoning."*
- "...the projected daily net increase in the traffic intensity of the site, which could potentially occur due to the proposed zone change, will be 152 weekday trips. This daily trip generation is within the 400-trip impact threshold that is considered a "small increase" in traffic; therefore, the zone change will not cause further degradation of the nearby transportation facilities."*
- "Based on the most recent five years of available crash data, three (3) crashes were reported along the 1,000-foot segment of SE River Road near the project site. Three crashes are not excessive or indicative of a safety problem. Therefore, the proposed zone change is expected to have a minimal impact on the operability and safety of the surrounding transportation system."*
- "Based on an analysis of the nearby transportation system, the existing transportation infrastructure is sufficient to accommodate impacts associated with the proposed zone change and potential redevelopment of the project site...Accordingly, the Transportation Planning Rule and Clackamas County general approval criteria are satisfied and no mitigation is necessary or recommended."*

*County Engineering staff has reviewed the traffic study and concurs with its assumptions and findings.*

***The relevant requirements of Statewide Planning Goal 12 are satisfied.***

## GOAL 13 – ENERGY CONSERVATION

Goal 13 encourages land use plans to consider lot size, siting controls, building height, density, and other measures in order to help conserve energy.

*This proposal would not change the County's acknowledged Comprehensive Plan policies or implementing regulations regarding energy conservation.*

***Statewide Planning Goal 13 is not applicable.***

#### GOAL 14 – URBANIZATION

The purpose of Goal 14 is 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.

*The application does not propose to expand or modify any UGB or to permit rural land uses inside the UGB.*

*The subject site is already inside of a UGB and is already planned to accommodate urban uses. The applicant's proposal would provide more opportunities for urban housing than could occur on the site under its current zoning configuration.*

***The relevant requirements of Statewide Planning Goal 14 are satisfied.***

#### GOAL 15 – WILLAMETTE RIVER GREENWAY

The purpose of Goal 15 is to “protect, conserve, enhance, and maintain the natural, scenic, historical, agricultural, economic, and recreational qualities of lands along the Willamette River as the Willamette River Greenway.”

*The subject property is approximately one-quarter mile from the Willamette River but is well outside the Willamette River Greenway. The applicant's proposal would not change the County's acknowledged Comprehensive Plan policies or implementing regulations regarding the Willamette River Greenway.*

***Statewide Planning Goal 15 is not applicable.***

#### GOAL 16 – ESTUARINE RESOURCES; GOAL 17 – COASTAL SHORELANDS; GOAL 18 – BEACHES AND DUNES; GOAL 19 – OCEAN RESOURCES

***Statewide Planning Goals 16 through 19 are not applicable to Clackamas County.***

### **B. Metro Urban Growth Management Functional Plan (UGMFP)**

The Metro Urban Growth Functional Plan, adopted by the Metro Council in 1997, is a regional functional plan which contains requirements that are binding on cities and counties of the region, including Clackamas County. It also contains recommendations that are not binding. The requirements and recommendations include those for the County's Comprehensive Plan and implementing ordinances.

*Staff reviewed the Applicant's proposal for consistency with UGMFP policies and finds the following are relevant.*

#### Title 1 – Housing Capacity

*3.07.120(e) of Title 1 provides that the County may reduce the minimum zoned capacity of a single lot or parcel so long as the reduction has a “negligible effect” on the County's overall minimum zoned residential capacity. The proposal does not include a reduction in zoned capacity, rather it proposes an increase in zoned capacity in the urban area. And, as noted by the applicant, it “will allow development of approximately 29 senior-oriented units, significantly expanding capacity in a*

*way that addresses the housing needs of an aging population” and thus “supports Metro’s Title 1 goal by creating opportunities for infill development in a location with existing infrastructure and services.”*

**The relevant requirements of Title 1 are satisfied.**

Title 8 – Compliance Procedures

*3.07.810 of Title 8 provides that an amendment to the county’s Comprehensive Plan or ZDO shall be deemed to comply with the Metro’s UGMFP only if the county has provided notice to Metro. The required notice of this proposal was sent to all affected agencies, including Metro, on October 20, 2025. To date, no comments have been received from Metro.*

**The relevant requirements of Title 8 are satisfied.**

**C. Clackamas County Comprehensive Plan (Plan)**

The County’s Comprehensive Plan includes goals and policies that must be considered when evaluating a proposed change in Comprehensive Plan. Staff have reviewed each chapter of the Comprehensive Plan. This section of the report outlines whether the Applicant’s proposal is consistent with the applicable goals and policies.

**Chapter 2: Citizen Involvement:** The purpose of this Chapter is to promote citizen involvement in the governmental process and in all phases of the planning process.

*There is one policy in this Chapter applicable to this application:*

- 2.A.1 Require provisions for opportunities for citizen participation in preparing and revising local land use plans and ordinances. Insure opportunities for broad representation, not only of property owners and County wide special interests, but also of those within the neighborhood or areas in question.

*The Comprehensive Plan and ZDO include acknowledged procedures for citizen involvement. This application has been processed consistent with those procedures. Specifically, the County has provided notice to interested agencies, local governments, and nearby property owners, consistent with state law and ZDO Section 1307, which implements the public notice policies of Chapter 2. Notice to property owners, public notices, and hearings ensure an opportunity for citizens to participate in the land use process.*

***This application is consistent with Chapter 2.***

**Chapter 4 Land Use:** This Section of the Comprehensive Plan includes the definitions for urban and rural land use categories, and outlines policies for determining the appropriate Comprehensive Plan land use designation for all lands within the County.

*This chapter contains sections addressing (1) Urbanization, (2) Urban Growth Concepts, and (3) land use policies for each designation. The land use policies for the proposed designations are addressed below.*

Policy 4.U.1 - The following areas may be designated High Density Residential when at least the first three criteria are met:

- 1) 4.U.1.1. Areas located either adjacent to or within proximity to major shopping centers, employment concentrations, and/or major transit centers.

*The Rose Villa-owned sites immediately west of the subject properties are already zoned HDR and therefore have already been determined to meet the required Comprehensive Plan criteria for such a designation. The subject properties in this application would be developed as an extension of the larger Rose Villa retirement facility, which has varying residential densities and retail, commercial opportunities throughout the entire development.*

*In addition, as noted by the applicant, “[t]he subject site is directly adjacent to the Rose Villa Senior Living campus, an established and expanding senior residential and care facility that functions as a local employment center. Rose Villa offers a wide range of jobs in healthcare, administration, and operations, making it a suitable anchor for increased residential density. The site is also within walking distance of transit service along SE River Road, with connections to commercial and employment centers in Milwaukie and along the McLoughlin Boulevard corridor”*

- 2) 4.U.1.2. Areas with access to a street designated as a major or minor arterial or collector. Siting should not result in significant traffic increase on local streets serving low density residential areas.

*The subject site has frontage on and direct access to both SE River Rd, a minor arterial, and to SE Torbank, a local street. As noted in the applicant’s traffic analysis, the proposed zone change would have negligible impact to the capacity of the transportation system, including the local streets in the vicinity that also serve adjacent low density residential areas.*

- 3) 4.U.1.3. Areas free from known geologic hazards, flooding, or soils subject to slippage.

*The subject site contains no wetlands, streams, creeks or other significant natural features. The site is relatively flat and is not located in any known hazard areas.*

- 4) 4.U.1.4. Areas adjacent to permanently protected open space or bodies of water as long as the above criteria apply.

*Although this criterion is not necessary for High Density Residential designation, staff notes that the southeast corner of the site is adjacent to school open space (ball fields and play areas) that are currently protected through open space zoning.*

***This policy is met.***

***This application is consistent with Chapter 4.***

**Chapter 5 Transportation:** This Chapter outlines policies addressing all modes of transportation and contains eight Sections including 1) Foundation and Framework; 2) Land Use and Transportation; 3) Active Transportation; 4) Roadways; 5) Transit; 6) Freight, Rail, Air, Pipelines and Water Transportation; 7) Finance and Funding; and 8) Transportation Projects and Plans.

*There is only one policy in this chapter applicable to this application:*

- 5.F.6 Require changes in land use plan designation and zoning designation to comply with the Transportation Planning Rule [Oregon Administrative Rules (OAR) 660-012-0060].

*The applicant's submitted traffic analysis, which was completed by a licensed engineer, finds that with this proposal, the TPR criteria outlined in OAR 660-012-0060 and Policy 5.F.6 are satisfied; the existing transportation infrastructure is considered sufficient to accommodate the proposed zone change; and no mitigation is required or recommended. Staff from County Engineering concur with the findings from the traffic analysis (see Exhibit 3).*

***This application is consistent with Chapter 5.***

**Chapter 6 Housing:** *This Chapter outlines policies addressing housing policies related to meeting the needs of all the county's populations.*

*Because this proposal would allow for wider variety of housing formats and affordability levels, including independent or assisted senior housing, apartments, or other attached housing types that are not feasible under the current R-10 zoning, it directly supports the following goals and policies in Chapter 6:*

- Housing Goal 2 – Encourage development that will provide a range of choices in housing type, density, and price throughout the County
- Policy 6.B.6 - Provide for increased capacity for multifamily development in the urban area.
- Policy 6.D.1 - Encourage growth in areas where public services can be economically provided,

***This application is consistent with Comprehensive Plan Chapter 6.***

**Chapter 11 The Planning Process:** The purpose of this Chapter is to establish a framework for land use decisions that will meet the needs of Clackamas County residents, recognize the County's interrelationships with its cities, surrounding counties, the region, and the state, and insure that changing priorities and circumstances can be met.

*There is only one policy in this chapter applicable to this application:*

- 11.A.1 Participate in interagency coordination efforts with federal, state, Metro, special purpose districts and cities. The County will maintain an updated list of federal, state and regional agencies, cities and special districts and will invite their participation in plan revisions, ordinance adoptions, and land use actions which affect their jurisdiction or policies.

*Notice of this application has been provided to all appropriate agencies and parties, and advertised public hearings before the Planning Commission and the Board of County Commissioners provide an adequate opportunity for interagency coordination of this proposed Comprehensive Plan map amendment and demonstrates compliance with this policy.*

***This application is consistent with Chapter 11.***

#### **D. Zoning & Development Ordinance (ZDO)**

Section 1202, *Zone Changes*, provides standards, criteria, and procedures under which a change to the County's zoning map may be approved. Staff has reviewed the subsections of Section 1202 relevant to this application and makes the following findings.

##### **Section 1202.02, Submittal Requirements**

Section 1202.02 lists the information that must be included in a complete application for a zone change.

*The application was initially submitted on June 23, 2025, and deemed incomplete. The applicant submitted additional materials on September 17, 2025, and the application was deemed complete that same day.*

##### **Section 1202.03, General Approval Criteria**

Section 1202.01 states that a zone change may be allowed, after a hearing conducted pursuant to Section 1307, if the applicants provide evidence substantiating the following criteria found in Subsection 1202.03 are met.

**Subsection 1202.03(A):** The proposed zone change is consistent with the applicable goals and policies of the Comprehensive Plan.

*Findings against the relevant Comprehensive Plan policies are detailed in Section III.C of this Staff Report (pages 13 to 15). Based on those findings and the findings provided by the applicant, staff finds that the proposed zone change is compliant with all relevant goals and policies in the Comprehensive Plan.*

***This application is consistent with Subsection 1202.03(A).***

**Subsection 1202.03(B):** If development under the proposed zoning district designation has a need for any of the following public services, the need can be accommodated with the implementation of the applicable service provider's existing capital improvement plan: sanitary sewer, surface water management, and water. The cumulative impact of the proposed zone change and development of other properties under existing zoning designations shall be considered.

*Development that could occur on the subject site under this proposal will need sanitary sewer, surface water management, and water services. The subject site is located in the Oak Lodge Sanitary and Water District which provides sewer, water, and surface water facilities and services in the area. The applicant has submitted a Preliminary Statement of Feasibility signed by a representative of Oak Lodge indicating that adequate sewer, water, and surface water facilities are available or can be made available through improvements completed by the district or developer.*

***This application is consistent with 1202.03(B).***

**Subsection 1202.03(C):** The transportation system is adequate and will remain adequate with approval of the proposed zone change. For purposes of this criterion:

1. Adequate means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, Motor Vehicle

Capacity Evaluation Standards for the Urban Area, and 5-2b, Motor Vehicle Capacity Evaluation Standards for the Rural Area.

2. The evaluation of transportation system adequacy shall be conducted pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012- 0060).
3. It shall be assumed that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.
4. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.
5. The adequacy standards shall apply to all roadways and intersections within the impact area of the proposed zone change. The impact area shall be identified pursuant to the Clackamas County Roadway Standards.
6. A determination regarding whether submittal of a transportation impact study is required shall be made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.
7. Notwithstanding Subsections 1202.03(C)(4) through (6), motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODOT Transportation Analysis Procedures Manual for roadways and intersections under the jurisdiction of the State of Oregon.

*Subsections 1202.03(C)(1) to (7) define what is meant by an “adequate” transportation system. The applicant’s traffic study, which was completed by a licensed engineer,*

*The applicant’s submitted traffic analysis, which was completed by a licensed engineer, finds that with this proposal, the TPR criteria outlined in OAR 660-012-0060 are satisfied; the existing transportation infrastructure is considered sufficient to accommodate the proposed zone change; and no mitigation is required or recommended. Staff from County Engineering concur with the findings from the traffic analysis (see Exhibit 3).*

***This application can be consistent with 1202.03(C).***

**Subsection 1202.03(D):** Safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.

*The applicant’s traffic study included a crash history review for the segment of SE River Road near the site and for the intersection at SE River Road and SE Torbank Road. The analysis covered the most recent five-year period (2019–2023) using data from the Oregon Department of Transportation’s Crash Data System. Three crashes were reported within this study area, all of which were identified as isolated incidents that do not indicate a pattern of concern or systemic safety deficiency. There were no fatal crashes, and no crash clusters or repeat conflict types were identified. The crash frequency and types are consistent with what would be expected on similar minor arterial corridors with mixed uses residential and institutional uses.*

*The applicant also provided a supplemental analysis, dated Sept 12, 2025, to address the safety of the system, specifically as it related to the condition of approval in Planning File Z0148-09-D. As noted previously, in 2009, the county approved a “master plan” for a multi-phased campus for Rose Villa, which limited the campus development to the west side of SE River Rd. due primarily*

to access and pedestrian safety concerns. File Z0148-09-D included the following condition that references one of the subject properties in this application:

6) The applicant shall meet or exceed the plans, goals, and time lines associated with the elimination of the East Property Operations, provided in the narrative on page eight of the June 2, 2009, submittal.

In this supplemental analysis, applicant's traffic engineer noted the following:

"Conditions along River Road have changed considerably since 2009 when the master plan was approved. Below is a summary and timeline of the relevant changes:

1. Rose Villa development on the west side of River Road reduced direct driveway access to only two locations, with meet applicable access spacing standards. Frontage improvements were constructed in 2015 that established the current configuration.
2. The marked pedestrian crossing on River Road at the Torbank Road intersection was upgraded with a rectangular rapid flashing beacon (RRFB) in 2015.
3. Beginning in 2015 and then completed in 2020, access control was established on the southeast corner of the intersection of River Road and Torbank Road with construction of a new curb and sidewalk.
4. The speed zone on River Road from the north end of the site south to Courtney Avenue was reduced from 35 mph to 30 mph by an ODOT speed zone order in 2021.
5. The intersection of Courtney Avenue at River Road south of the site was converted to an all-way stop control in 2024. This improvement has helped control speed in the neighborhood and also serves to meter northbound traffic along the Rose Villa frontage."

The transportation engineer concludes: "as summarized above, the changes along River Road since the approval of the master plan and the adoption of condition #6 above have significantly improved transportation safety and operations in the neighborhood that support the removal of condition #6." And "because River Road now meets current design and safety standards, it is no longer necessary to move all Rose Villa operations to the west side of River Road." Staff concurs and finds that the removal of condition # 6 in planning file Z0148-09-D is warranted.

**This application is consistent with 1202.03(D).**

Clackamas County is committed to providing meaningful access and will make reasonable accommodations, modifications, or provide translation, interpretation or other services upon request. Please contact us at 503-742-4545 or email [DRenhard@clackamas.us](mailto:DRenhard@clackamas.us).

503-742-4545: ¿Traducción e interpretación? |Требуется ли вам устный или письменный перевод? | 翻译或口译 ? | Cần Biên dịch hoặc Phiên dịch? | 번역 또는 통역?

**PLANNING COMMISSION  
MINUTES**

November 24, 2025

6:30 pm

On the Zoom platform

Recording available at <https://www.clackamas.us/planning/planning-commission>

Commissioners present: Gerald Murphy, Tom Peterson, Michael Wilson, Louise Lopes, Tammy Stevens, Brian Lee, Ryan Founds, Scott Cantonwine.

Commissioners absent: Jennifer Satter.

Staff present: Jennifer Hughes, Planning Director; Martha Fritzie, Principal Planner; Darcy Renhard, Administrative Specialist II

Guests: Thuy Cao, Lancaster Mobley (Consultant for applicant), Jim Williford, Rose Villa (Applicant)

Commission Chair Peterson called the meeting to order at 6:31 p.m.

Roll Call: Ms. Renhard called the roll.

Public Comment: No members of the public wished to provide testimony.

Chair Peterson opened the public hearing for file numbers Z0247-25 and Z0248-25, a proposed Comprehensive Plan Map amendment and corresponding Zone Change for Rose Villa.

Commissioner Lee disclosed that he has a professional and personal relationship with Lancaster Mobley, the consultant for the applicant. This does not raise any concern regarding his ability to participate in the hearing.

Ms. Fritzie presented the staff recommendation and findings. The proposal is to change the Comprehensive Plan designation from Low Density Residential (LDR) to High Density Residential (HDR) and the zoning from Urban Low Density Residential (R-10) to High Density Residential (HDR). These changes will facilitate future expansion of the Rose Villa senior living community. The applicant is also requesting removal of a condition in file Z0148-09-D that limits the ability for Rose Villa to develop on the east side of SE River Road. If approved, the Comp Plan/zone change would not authorize any specific development. Any future development would be subject to the design review process.

The surrounding area consists of primarily residential uses. There are single-family dwellings, some newer middle housing, and some multi-family housing. Across SE River Road to the west is a large senior living campus that Rose Villa has already developed. To the north is another senior housing and continuing care community. To the east of the subject sites is an elementary school.

Ms. Fritzie explained that there are a lot of policies and criteria that must be met for a Comp Plan/Zone Change and because these properties are within the Metro Urban Growth Boundary, the Metro Urban Growth Management Functional Plan applies as well as the County Zoning & Development Ordinance. Detailed findings are outlined in the staff report as well as in the applicant's submittal.

In Section 1202 of the ZDO there are four main criteria for zone changes. The first criterion is that the proposal must comply with the applicable goals and policies of the Comprehensive Plan. In this case, there are several chapters that were found to be applicable. Chapters 2 and 11 are largely procedural that were all followed. Chapter 5 states that a zone change must comply with the State's Transportation Planning Rule. The applicant provided a traffic study which demonstrates compliance with the Transportation Planning Rule. Chapter 4 contains the land use policies that direct the County on where plan designations can be applied. It states that the HDR designation may be applied if at least three of the four criteria listed are met: 1. It must be adjacent to or within proximity of major shopping centers, employment concentrations, and/or major transit centers; 2. The property must have access to a collector, minor arterial, or major arterial road and, in addition, not create a significant traffic increase on local streets that serve low-density residential areas; 3. The site must be free of known geologic hazards, flooding, or soils subject to slippage; and 4. The site is adjacent to permanently protected open space or bodies of water as long as the first three criteria are applicable. Staff finds that all four of these criteria are met. Chapter 6 is our housing policies. Generally speaking, this proposal supports the goals and policies of Chapter 6 to provide more housing choice in the county. The first criteria in the ZDO related to the Comprehensive Plan is met.

The second criterion in Section 1202 of the ZDO requires demonstration that any public services needed are available and sufficient for development under the new zoning designation. Oak Lodge is the local service provider for sewer and water, and they signed a statement of feasibility that sewer, water, and surface water management is or can be made available to support the development under the new zoning designation. The last two criteria relate to the transportation system and whether the development under the new zoning designation would maintain the same or comparable level of adequacy and safety. County Engineering has reviewed the applicant's traffic study and found that there is no significant impact to the adequacy or safety of the transportation system.

The applicant provided a supplemental traffic analysis to specifically address the condition of approval in file Z0148-09 which was a design review approval that created a master plan for the larger Rose Villa senior housing development on the west side of River Road. This specific condition required Rose Villa to cease operations on the east side of SE River Road. The reason this condition was applied was largely due to access and pedestrian safety concerns and what they were proposing on the west side of River Road did not meet the standards at the time. They were given an exception if all their operations were limited to the west side of the road. Since that time, River Road has had significant safety improvements and Rose Villa reduced the number of access points on the west side of the road. The traffic engineer concluded that this condition is, therefore, no longer necessary.

Staff finds that this proposal meets all the applicable criteria for the Comprehensive Plan Map amendment from LDR to HDR and for the concurrent zone change from R-10 to HDR, and that removal of condition #6 in Z0148-09-D is warranted.

Commissioner Murphy asked if there was a building height limitation in the HDR zone that is different than the R-10 zone. Ms. Fritzie responded that while there is not a height limit in HDR zones, you are limited by density and setbacks. The higher a building is, the farther it needs to be from other surrounding buildings.

Any future development would need to go through the design review process, at which point water and sewer needs are addressed with the local service provider. They would impose specific requirements on the development at that time.

Thuy Cao represents the applicant, Rose Villa. She describes what the applicant is hoping to eventually develop on the property and the proposed Comp Plan/zone change would expand the allowance from about 5 housing units to 29 housing units. This will provide more housing options in the community, specifically for senior living. The conditions on River Road have changed drastically since condition 6 was put in place in 2009. Their traffic impact analysis determined that the future development that they want will not have any significant impact on the safety or capacity of the transportation system.

Commissioner Wilson asked if the residents of the new development would be crossing River Road to come to the existing facilities. Ms. Cao responded that the future development could result in additional foot traffic. There have been additional safety measures put in place on River Road, so she is not sure how that would impact it in the future.

Commissioner Murphy asked if the current units are already full. Jim Williford, the applicant, said that the community runs at about 99% occupancy. The 1% vacancy is just because they need to remodel homes where they have a transition. There are about 350 people on their waitlist right now. There is a tremendous shortfall in available housing in their industry. They do not expect that to change in the near future.

Commissioner Murphy thinks that this is a great addition to this neighborhood.

Commissioner Lee is a firm believer that one of the ways we are going to address the need for housing is to build housing of all types. This is one type that is definitely needed.

Commissioner Stevens has been to the Rose Villa community and thinks that it is a great facility. She emphasized the importance of future residents being able to cross River Road safely.

Commissioner Lopes wanted to know if all of the units are rentals or are there units that are available to purchase and if there were subsidized units. Mr. Williford explained the options available to potential residents and that it is not subsidized housing.

Commissioner Peterson supports this proposal and agrees that it is one more step toward addressing the housing need in the County.

Commissioner Stevens moved to recommend approval of file numbers Z0247-25 and Z0248-25 as presented by staff, and to remove condition #6 from Z0148-09-D. Commissioner Cantonwine seconded the motion. *(Ayes=8, Nays=0. Motion is passed)*

Commissioner Stevens moved approval of the minutes of the November 10, 2025, study session as drafted. Commissioner Murphy requested that the minutes reflect his request to have all Planning Commission recordings posted to the web page. Commissioner Stevens amended her motion to include this addition. Commissioner Lee seconded. *(Ayes=8, Nays=0. Motion is passed.)*

Ms. Hughes provided a schedule update.

There being no further business, Chair Peterson adjourned the meeting at 7:26 p.m..

**Planning Commission/BCC Exhibit List  
In The Matter Of File No. Z0247-25 & Z0248-25**

| <b><i>Ex. No.</i></b> | <b><i>Date Received</i></b> | <b><i>Author or source</i></b> | <b><i>Subject &amp; Date of document</i></b>                                                                                                |
|-----------------------|-----------------------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| 1*                    | 6/23/25 & 9/17/25           | Applicant & Planning Staff     | Submitted Application   6/23/25 & 9/17/25                                                                                                   |
| 2*                    | ---                         | Planning Staff                 | Misc. background documents: <ul style="list-style-type: none"> <li>• Assessors map (21E02DA)</li> <li>• Planning file Z0148-09-D</li> </ul> |
| 3*                    | 11/4/25                     | Engineering Staff              | County Engineering TIS Comments   11/4/25                                                                                                   |
| 4                     |                             |                                |                                                                                                                                             |
| 5                     |                             |                                |                                                                                                                                             |
| 6                     |                             |                                |                                                                                                                                             |
| 7                     |                             |                                |                                                                                                                                             |
| 8                     |                             |                                |                                                                                                                                             |
| 9                     |                             |                                |                                                                                                                                             |
| 10                    |                             |                                |                                                                                                                                             |
| 11                    |                             |                                |                                                                                                                                             |
| 12                    |                             |                                |                                                                                                                                             |
| 13                    |                             |                                |                                                                                                                                             |
| 14                    |                             |                                |                                                                                                                                             |
| 15                    |                             |                                |                                                                                                                                             |
| 16                    |                             |                                |                                                                                                                                             |
| 17                    |                             |                                |                                                                                                                                             |
| 18                    |                             |                                |                                                                                                                                             |



**NOTICE OF PUBLIC HEARINGS BEFORE THE PLANNING COMMISSION AND THE BOARD OF COUNTY COMMISSIONERS ON A PROPOSAL IN YOUR AREA**

**Date of Mailing of this Notice:** October 20, 2025

**Notice Sent to:** Applicant; property owners within 300 feet of the subject property; and applicable cities, Community Planning Organizations (CPOs), special districts, and government agencies

*Please note that the Planning Commission is holding land use public hearings virtually using the Zoom platform, and that the Board of County Commissioners is holding land use public hearings **both in person and virtually using the Zoom platform.***

**PLANNING COMMISSION HEARING:**

**Hearing Date & Time:**

Monday, November 24, 2025,  
at 6:30pm

**How to Attend via Zoom:**

One week prior to the hearing, a Zoom link to the public hearing and details on how to observe and testify online or by telephone will be available on our website:

<https://www.clackamas.us/planning/planning-commission>

**BOARD OF COUNTY COMMISSIONERS HEARING:**

**Hearing Date & Time:**

Tuesday, December 9, 2025,  
at 11:00am

**In-Person Hearing Location:**

BCC Hearing Room (4<sup>th</sup> Floor), 2051 Kaen Rd, Oregon City, 97045

**How to Attend via Zoom:**

One week prior to the hearing, a Zoom link to the public hearing and details on how to observe and testify online or by telephone will be available on our website:

[www.clackamas.us/meetings/bcc/landuse](http://www.clackamas.us/meetings/bcc/landuse)

**Planning File Numbers:** Z0247-25 and Z0248-25

**Applicant(s):** Thuy Cao; Harper Houf Peterson Righellis, Inc

**Property Owner(s):** Rose Villa Inc

**Proposal:** A Comprehensive Plan map amendment to change the land use plan designation for the subject properties from Low Density Residential (LDR) to High Density Residential (HDR), with a corresponding zone change from Urban Low Density Residential (R-10) to High Density Residential (HDR). Proposal includes a request to remove a condition in file Z0148-09, which limits the ability for Rose Villa to develop on the east side of SE River Rd. No development is proposed with this application.

**Subject Tax Lot:** T2S, R1E, Section 02DA Tax Lots 03400 & 03500

**Situs Address:** 1802 SE Torbank Rd & 13614 SE River Rd

**Location of Subject Property:** On the southeast corner of SE River Rd and SE Torbank Rd.

**Area of Subject Property:** Approximately 1.15 acres

**Current Zoning:** Urban Low Density Residential (R-10)

**Approval Criteria:** Statewide Planning Goals; Clackamas County Comprehensive Plan; Metro Urban Growth Management Functional Plan; and Clackamas County Zoning and Development Ordinance (ZDO) Sections 202, 315, 1202, and 1307.

**NOTICE TO MORTGAGEE, LIENHOLDER, VENDOR OR SELLER:**

ORS CHAPTER 215 REQUIRES THAT IF YOU RECEIVE THIS NOTICE, IT MUST PROMPTLY BE FORWARDED TO THE PURCHASER.

## HOW TO OBTAIN ADDITIONAL INFORMATION

**Staff Contact:** Martha Fritzie, Principal Planner (Tel: 503-742-4529, Email: mfritzie@clackamas.us)

A copy of the entire application, all documents and evidence submitted by or on behalf of the applicant, and applicable criteria are available for inspection at no cost. In addition, a staff report on the application will be available for inspection at no cost at least **seven days prior to the Planning Commission hearing**. Hard copies of documents will be provided at reasonable cost. You may inspect or obtain these materials by:

1. Emailing or calling the staff contact, Martha Fritzie (see above);
2. Visiting the Planning & Zoning Division, at the address shown at the top of the first page of this notice, during regular business hours, which are Monday-Thursday, 8:00am to 4:00pm; or
3. Online at <https://aca-prod.accela.com/CLACKAMAS>. After selecting the "Planning" tab, enter the File Number to search. Select Record Info and then select "Attachments" from the dropdown list, where you will find the submitted application.

### Community Planning Organization for Your Area:

The following recognized Community Planning Organization (CPO) has been notified of this application and may develop a recommendation. You are welcome to contact the CPO and attend their meeting on this matter, if one is planned. If this CPO currently is inactive and you are interested in becoming involved in land use planning in your area, please contact the Community Involvement Office at 503-655-8552. **CPO: Oak Grove Community Council**, Valerie Chapman, [contact@oakgrovecpo.com](mailto:contact@oakgrovecpo.com)

---

## HOW TO SUBMIT TESTIMONY ON THIS APPLICATION

- All interested parties are invited to attend the Zoom hearings remotely online or by telephone, and to attend the Board of County Commissioners' hearing in person. They will be provided with an opportunity to testify orally, if they so choose. One week prior to each hearing, additional instructions will be available online as explained on the first page of this notice.
- Written testimony received by **November 11, 2025**, will be considered by staff prior to the issuance of the staff report and recommendation on this application. However, written testimony will continue to be accepted until the record closes, which may occur as soon as the conclusion of the Board of County Commissioners' hearing.
- Written testimony may be submitted by email, fax, regular mail, or hand delivery. Please include the case file numbers (Z0247-25 & Z0248-25) on all correspondence and address written testimony to the staff contact who is handling this matter (Martha Fritzie).
- Testimony, arguments, and evidence must be directed toward the approval criteria identified on the first page of this notice. Failure to raise an issue at the hearing or by letter prior to the close of the record, or failure to provide statements or evidence sufficient to afford the Board of County Commissioners and the parties involved an opportunity to respond to the issue, precludes an appeal to the Oregon Land Use Board of Appeals based on that issue.
- Written notice of the Board of County Commissioners' decision will be mailed to you **if you submit a written request and provide a valid mailing address**.

---

## PROCEDURE FOR THE CONDUCT OF THE HEARINGS

The following procedural rules have been established to allow orderly public hearings:

1. The length of time given to individuals speaking for or against an item will be determined by the Chair presiding over the hearing prior to the item being considered.
2. A spokesperson representing each side of an issue is encouraged.
3. Prior to the conclusion of the evidentiary hearing, any participant may request an opportunity to present additional evidence, arguments, or testimony regarding the application. The Planning Commission or the Board of County Commissioners may either continue the hearing or leave the record open for additional written evidence, arguments, or testimony.
4. The Planning Commission will make a recommendation to the Board of County Commissioners on the application. The Board of County Commissioners is the final decision-maker for Clackamas County on this matter

*Clackamas County is committed to providing meaningful access and will make reasonable accommodations, modifications, or provide translation, interpretation or other services upon request. Please contact us at 503-742-4545 or email [DRenhard@clackamas.us](mailto:DRenhard@clackamas.us).*

503-742-4545: ¿Traducción e interpretación? |Требуется ли вам устный или письменный перевод?  
翻译或口译? | Cần Biên dịch hoặc Phiên dịch? | 번역 또는 통역?

***Rose Villa Senior Living Comp Plan/Rezone***  
**Land Use Application Narrative**

Type III Review – Comprehensive Plan Map Amendment and Zone Change

---

**Property Owner:** RoseVilla Senior Living (Attn: Jim Willeford)  
13505 SE River Road  
Portland, OR 97222  
JWilleford@rosevilla.org  
(971) 707-8510

**Applicant:** Thuy Cao, AICP  
Harper Houf Peterson Righellis, Inc.  
205 SE Spokane Street, Suite 200  
Portland, OR 97202  
thuyc@hhpr.com  
(503) 221-1131 ext. 154

**Site Address:** 1802 SE Torbank Road and 13614 SE River Road

**Tax Lots:** Tax Map 21E02DA Tax Lot 3400 and 3500

**Site Size:** 1.19 acres

**Zoning:** R-10

**Summary of Request:** Proposal to rezone two properties adjacent to the existing Rose Villa Senior Living campus from R-10 to HDR for future redevelopment, including the request to remove Condition #6 in Z0148-09.

**Date:** August 29, 2025



## TABLE OF CONTENTS

---

|             |                                                            |           |
|-------------|------------------------------------------------------------|-----------|
| <b>I.</b>   | <b>BACKGROUND</b>                                          | <b>4</b>  |
|             | <i>SUMMARY</i>                                             | 4         |
|             | <i>PLANNING CONTEXT</i>                                    | 4         |
| <b>II.</b>  | <b>RESPONSE TO APPROVAL CRITERIA</b>                       | <b>5</b>  |
|             | <i>STATEWIDE PLANNING GOALS</i>                            | 5         |
|             | Goal 1. Citizen Involvement                                | 5         |
|             | Goal 2. Land Use Planning                                  | 5         |
|             | Goal 10. Housing                                           | 5         |
|             | Goal 11. Public Facilities and Services                    | 6         |
|             | Goal 12. Transportation                                    | 6         |
|             | <i>OREGON REVISED STATUTES (ORSs)</i>                      | 6         |
|             | <i>OREGON ADMINISTRATIVE RULES (OARs)</i>                  | 7         |
|             | <i>METRO URBAN GROWTH MANAGEMENT FUNCTION PLAN (UGMFP)</i> | 7         |
|             | Title 1: Housing Capacity                                  | 7         |
|             | Title 12: Protection of Residential Neighborhoods          | 7         |
|             | <i>COMPREHENSIVE PLAN (COMP PLAN)</i>                      | 8         |
|             | CHAPTER 2 – CITIZEN INVOLVEMENT                            | 8         |
|             | CHAPTER 3 – NATURAL RESOURCES AND HAZARDS                  | 8         |
|             | CHAPTER 4 – LAND USE                                       | 9         |
|             | CHAPTER 5 – TRANSPORTATION SYSTEM PLAN                     | 10        |
|             | CHAPTER 6 -- HOUSING                                       | 10        |
|             | CHAPTER 7 – PUBLIC FACILITIES AND SERVICES                 | 11        |
|             | CHAPTER 8 – ECONOMIC DEVELOPMENT                           | 12        |
|             | <i>ZONING AND DEVELOPMENT ORDINANCE (ZDO)</i>              | 12        |
|             | ZDO SECTION 1202 (ZONE CHANGES)                            | 12        |
|             | 1202.03 General Approval Criteria                          | 12        |
| <b>III.</b> | <b>APPLICATION SUBMITTAL NARRATIVE RESPONSES</b>           | <b>16</b> |
| <b>IV.</b>  | <b>CONCLUSION</b>                                          | <b>19</b> |



## ATTACHMENTS

1. Land Use Application
2. Site Plan
3. Tax Map
4. Preliminary Statement of Feasibility
5. Transportation Impact Study



## I. BACKGROUND

---

### SUMMARY

The owners are requesting a comprehensive map amendment and zone change for two properties adjacent to the existing Rose Villa Senior Living campus from Low Density Residential (R-10) to High Density Residential (HDR). The project site is approximately 1.19 acres in size and consists of two properties located at 1802 SE Torbank Road and 13614 SE River Road (Tax lots 3400 and 3500).

### PLANNING CONTEXT

The project site is located at 1802 SE Torbank Road and 13614 SE River Road in unincorporated Clackamas County, directly adjacent to the existing Rose Villa Senior Living campus. The two properties—Tax Lots 3400 and 3500—total approximately 1.19 acres and are currently zoned R-10 (Low Density Residential), with a corresponding Comprehensive Plan designation of Low Density Residential. The site is bound to the west by SE River Road, a minor arterial roadway, and to the north by SE Torbank Road, classified as a local street. The existing built context includes the Rose Villa campus to the west, and additional single-family lots surrounding the two properties. The properties are currently developed with residential structures and accessory buildings.

The applicants are seeking a Comprehensive Plan Map Amendment and Zone Change to re-designate the properties from Low Density Residential to High Density Residential (HDR). This change is intended to facilitate the future expansion of the Rose Villa Senior Living community and accommodate additional senior-oriented housing. The subject site meets multiple policy criteria outlined in the Clackamas County Comprehensive Plan for HDR designation, including proximity to a minor arterial (SE River Road), adjacency to an established employment and services center (Rose Villa), and the absence of mapped natural hazards. The zone change proposal is also supported by a comparative trip generation analysis demonstrating that the projected increase in vehicle trips falls below the threshold considered a significant effect under the Oregon Highway Plan and Transportation Planning Rule (OAR 660-012-0060).

#### Vicinity Map



## **II. RESPONSE TO APPROVAL CRITERIA**

---

### **STATEWIDE PLANNING GOALS**

#### **Goal 1. Citizen Involvement**

*Local governments must provide opportunities for meaningful public involvement in land use planning, including notice, access to information, and the ability to participate in public hearings.*

**Response:** This proposal is being processed as a Type III land use application by Clackamas County and is therefore subject to public notice and hearings before the Planning Commission and Board of County Commissioners. The applicants have already participated in a pre-application conference and will respond to public and agency comments throughout the process. This ensures compliance with Goal 1 by providing multiple opportunities for public input.

#### **Goal 2. Land Use Planning**

*Land use decisions must be based on coordinated planning and an adequate factual base. Comprehensive Plan amendments and zone changes must be justified with supporting evidence and coordination with affected agencies.*

**Response:** The proposed zone change and Comprehensive Plan amendment are supported by a coordinated and fact-based land use application. This includes utility feasibility statements, a Transportation Planning Rule (TPR) analysis, and compliance findings with the County's Comprehensive Plan and Metro Functional Plan. Service providers and County staff have been engaged through the pre-application process, ensuring inter-agency coordination. Therefore, the application satisfies the procedural and substantive requirements of Goal 2.

#### **Goal 10. Housing**

*This goal requires local jurisdictions to provide for an adequate number of housing units and to encourage the efficient use of buildable land within urban growth boundaries. OAR 660-007 and 660-008 define the standards for determining compliance with Goal 10.*

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from Low Density Residential (R-10) to High Density Residential (HDR) directly supports Goal 10 by enabling a greater number of housing units on a site that is already served by urban services and located within the Metro Urban Growth Boundary. The subject site is 1.19 acres and could accommodate approximately 29 units under the proposed HDR zoning, compared to a maximum of 6 units under the existing R-10 zoning. This represents a more efficient use of land that aligns with the intent of Goal 10 to maximize housing production within designated urban areas.

Furthermore, the proposed HDR designation is consistent with local and regional efforts to expand housing choice, density, and affordability, particularly for seniors. As an extension of the Rose Villa Senior Living campus, the project will likely offer housing types specifically designed for the aging population, contributing to a balanced and inclusive housing supply that meets the needs of diverse household types and income levels. The proposal does not reduce housing capacity and instead supports Clackamas



County's obligation under Goal 10 to ensure adequate buildable land for housing development across the full range of needed housing types.

**Goal 11. Public Facilities and Services**

*Development must be served by adequate public facilities and services (e.g., sewer, water, storm drainage), and those services must be planned and coordinated in an efficient, cost-effective manner.*

**Response:** A Preliminary Statement of Feasibility from the Oak Lodge Water Services District (OLWSD) confirms that sanitary sewer, potable water, and surface water management systems have capacity to serve the proposed HDR development. The site is within an existing service area and no extraordinary improvements are required. The project complies with Goal 11 by demonstrating the availability and efficiency of public facilities consistent with adopted service provider plans.

**Goal 12. Transportation**

*The applicant will be required to submit a traffic study or similar evidence to demonstrate compliance with requirements of the Transportation Planning Rule (TPR), found in Oregon Administrative Rules 660-012-0060, as well as the requirements of ZDO Section 1202.03 and Chapter 5 of the Comprehensive Plan.*

**Response:** The applicant has prepared a Transportation Planning Rule (TPR) analysis evaluating the potential impact of the proposed zone change from Low Density Residential (R-10) to High Density Residential (HDR) on the surrounding transportation network. The analysis compares a reasonable worst-case development scenario under both zoning designations and concludes that the proposed HDR zoning would generate a net increase of 152 weekday trips, which falls below the 400-trip threshold used by the Oregon Highway Plan to define a “significant effect.” The report also includes a crash history review for the SE River Road and SE Torbank Road intersection and surrounding segment. Only three crashes were reported over a five-year period, none of which indicate a pattern of safety concerns. Based on this data, the report finds that the proposed zone change will not degrade transportation performance or safety and that no mitigation is required. Therefore, the application complies with Goal 12, the Transportation Planning Rule, ZDO Section 1202.03(C) and (D), and relevant policies in Chapter 5 of the Clackamas County Comprehensive Plan. The existing transportation infrastructure is adequate to support the modest increase in traffic associated with the proposed residential density.

(Goals 3–9 and Goals 13–19 are not applicable to this proposal as the site is within the UGB, not designated for agricultural, forest, or natural resource protection, and does not involve coastal, recreational, or energy planning.)

## OREGON REVISED STATUTES (ORSs)

**Response:** This application is consistent with the relevant provisions of ORS Chapter 197 (Comprehensive Land Use Planning Coordination), including:

- ORS 197.175(2)(a), which requires local governments to carry out their duties under the Statewide Planning Goals through comprehensive plans and implementing regulations.



- The proposed map amendment and zone change are supported by findings that demonstrate consistency with both the Statewide Goals and the County's acknowledged Comprehensive Plan and Development Ordinance.

## **OREGON ADMINISTRATIVE RULES (OARs)**

**Response:** The application complies with the following from the OARs:

- OAR 660-012-0060 (Transportation Planning Rule). A formal TPR analysis was completed and demonstrates that the proposed zone change will not significantly affect the transportation system as defined under the rule. The projected net increase in daily trips falls well below the 400-trip threshold that would require mitigation, and all studied intersections continue to meet performance standards. The County, Metro, and ODOT policies are fully addressed in the accompanying analysis.
- OAR 660-007 and 660-008 (related to Goal 10 implementation). These rules guide housing planning and coordination within the Portland Metropolitan Urban Growth Boundary. The proposed HDR designation increases residential capacity on underutilized land and supports the provision of age-friendly and special needs housing, consistent with these administrative rules.

## **METRO URBAN GROWTH MANAGEMENT FUNCTION PLAN (UGMFP)**

### **Title 1: Housing Capacity**

*To ensure local jurisdictions maintain or increase housing capacity sufficient to accommodate projected regional population growth and housing needs.*

**Response:** The proposed zone change from R-10 to HDR on the 1.19-acre subject site is consistent with Title 1 because it increases overall residential capacity within the existing Urban Growth Boundary (UGB). The current R-10 zoning permits only approximately four to five housing units across both parcels. The HDR designation will allow development of approximately 29 senior-oriented units, significantly expanding capacity in a way that addresses the housing needs of an aging population.

The site is adjacent to the Rose Villa Senior Living campus, a long-established community serving a broad spectrum of senior residents. This proposal supports Metro's Title 1 goal by creating opportunities for infill development in a location with existing infrastructure and services. The proposed units will not displace existing households and are located on parcels already developed with low-intensity, aging residential structures. Therefore, the proposed amendment not only maintains but enhances the region's ability to meet future housing demand, particularly for age-friendly and accessible housing.

### **Title 12: Protection of Residential Neighborhoods**

*To protect the livability and stability of existing residential neighborhoods, with special attention to preventing displacement, increasing equitable access to housing, and preserving neighborhood character.*



**Response:** The proposed HDR designation supports the objectives of Title 12 by providing new senior housing options without displacing existing households. The two subject properties are directly adjacent to Rose Villa and are currently underutilized, containing one single-family home and accessory structures. The proposed development will introduce compatible residential uses designed for aging residents and integrated into the existing senior community.

The zone change does not compromise the character or livability of the surrounding area. The project site fronts SE River Road, a minor arterial capable of supporting moderate increases in traffic, and avoids burdening local residential streets. Senior housing is a low-impact use, with trip generation rates and noise levels lower than typical market-rate multifamily developments. In addition, the expanded housing options for older adults within an established senior community directly align with Metro’s goals for equitable and inclusive neighborhoods. The proposed amendment also enhances neighborhood stability by providing long-term housing options for aging residents who may otherwise need to relocate outside the community. By supporting aging in place and co-location of services, this proposal contributes to a more resilient, inclusive residential neighborhood.

## **COMPREHENSIVE PLAN (COMP PLAN)**

### **CHAPTER 2 – CITIZEN INVOLVEMENT**

#### **Policy 2.A.1**

*Require provisions for opportunities for citizen participation in preparing and revising local land use plans and ordinances. Insure opportunities for broad representations, not only of property owners and Countywide special interests, but also of those persons within the neighborhood or areas in question.*

**Finding:** The applicant has met citizen involvement requirements by engaging in the County’s public land use process, including participation in a pre-application conference and preparation of a Type III application that will be subject to public notice and hearing procedures. Nearby residents and Community Planning Organizations (CPOs) will be notified and given the opportunity to comment on the proposed zone change, consistent with Clackamas County’s citizen involvement policies.

### **CHAPTER 3 – NATURAL RESOURCES AND HAZARDS**

#### **Policy 3.A.1**

*Maintain rivers and streams in their natural state to the maximum practicable extent through sound water and land management practices. Consideration shall be given to natural, scenic, historic, economic, cultural, and recreational qualities of the rivers and adjacent lands.*

#### **Policy 3.A.3**

*Apply erosion and sediment reduction practices in all river basins to assist in maintaining water quality. Existing riparian vegetation along streams and river banks should be retained to provide fisheries and wildlife habitat, minimize erosion and scouring, retard water velocities, and suppress water temperatures.*

**Finding:** There are no mapped water quality resource areas or protected natural features on the subject site. The proposed rezone does not conflict with policies intended to protect riparian buffers, water quality, or significant natural resources



## **CHAPTER 4 – LAND USE**

### **Policy 4.U.1**

*The following areas may be designated High Density Residential when at least the first three criteria are met:*

*4.U.1.1 – Areas located either adjacent to or within proximity to major shopping centers, employment concentrations, and/or major transit centers.*

*4.U.1.2 – Areas with access to a street designated as a major or minor arterial or collector. Siting should not result in significant traffic increase on local streets serving low density residential areas.*

*4.U.1.3 – Areas free from known geologic hazards, flooding, or soils subject to slippage.*

*4.U.1.4 – Areas adjacent to permanently protected open space or bodies of water as long as the above criteria are applicable.*

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from Low Density Residential (R-10) to High Density Residential (HDR) for two properties located at 1802 SE Torbank Road and 13614 SE River Road (Tax Lots 3400 and 3500) is consistent with Clackamas County Comprehensive Plan Chapter 4, Policy 4.U.1. This policy permits HDR designations where at least the first three criteria are met:

#### *4.U.1.1 – Proximity to Employment Concentrations or Major Transit Centers*

The subject site is directly adjacent to the Rose Villa Senior Living campus, an established and expanding senior residential and care facility that functions as a local employment center. Rose Villa offers a wide range of jobs in healthcare, administration, and operations, making it a suitable anchor for increased residential density. The site is also within walking distance of transit service along SE River Road, with connections to commercial and employment centers in Milwaukie and along the McLoughlin Boulevard corridor.

#### *4.U.1.2 – Access to a Major or Minor Arterial or Collector*

The site has direct access to SE River Road, which is classified as a minor arterial. While SE Torbank Road, located along the northern edge of the site, is a local street, the project does not propose new access from SE Torbank. Access and circulation are expected to rely on SE River Road, thereby avoiding additional traffic burden on local residential streets. A Transportation Planning Rule (TPR) compliance analysis was prepared for this proposal and confirms that the zone change would result in a projected increase of only 152 daily trips—well below the 400-trip threshold used by the Oregon Highway Plan to define a “significant effect.” Therefore, the proposed designation is not expected to create significant traffic impacts on surrounding local streets.

#### *4.U.1.3 – Free from Known Hazards or Constraints*

The site is not located within a mapped floodplain or wetland and is not subject to known geologic hazards or soils prone to slippage, as confirmed by the Oregon State Wetland Inventory and DOGAMI hazard mapping. The site is considered free from natural development constraints and suitable for higher density residential development.

#### *4.U.1.4 – Adjacent to Permanently Protected Open Space or Water Bodies*



While not adjacent to protected open space or water bodies, this criterion is not mandatory. The proposal meets the first three criteria and is therefore eligible for High Density Residential designation under Policy 4.U.1.

The proposed amendment is consistent with Policy 4.U.1 of the Comprehensive Plan, which allows HDR designations in areas that are well-served by transportation infrastructure, proximate to employment and services, and free from natural hazards. The zone change supports the County's broader housing and land use goals by facilitating a logical extension of the Rose Villa Senior Living campus.

## **CHAPTER 5 – TRANSPORTATION SYSTEM PLAN**

### **Policy 5.F.6**

*Require changes in land use plan designation and zoning designation to comply with the Transportation Planning Rule "TPR" (Oregon Administrative Rules (OAR) 660- 012-0060).*

**Response:** A Transportation Planning Rule (TPR) compliance analysis has been prepared for this application to evaluate the potential impacts of the proposed zone change on the surrounding transportation system. The analysis compares the reasonable worst-case development scenario under the current R-10 zoning (6 residential units) with that of the proposed High Density Residential (HDR) zoning (29 residential units). The study estimates that full build-out under the HDR designation would generate a net increase of approximately 152 weekday trips, including 9 AM peak hour and 12 PM peak hour trips. This increase falls well below the 400 daily trip threshold identified in the Oregon Highway Plan (OHP) as constituting a "small increase" in traffic that does not trigger a significant effect under the TPR. Additionally, the proposed zone change will not alter the functional classification of any transportation facilities, degrade performance below adopted mobility targets, or create inconsistencies with existing transportation system plans.

Based on this analysis, the proposed amendment complies with the Transportation Planning Rule and satisfies Policy 5.F.6. No mitigation is required or recommended, and the existing transportation infrastructure is considered sufficient to accommodate the proposed zone change.

Prior approvals for the Rose Villa Master Plan (Z0148-09-D, 2009) included Condition #6 requiring the eventual elimination of operations on the east side of River Road. This condition was tied to transportation safety concerns related to multiple direct access points and pedestrian crossings of SE River Road. Since that time, significant infrastructure and safety improvements have occurred, including consolidation of campus driveways to two access points meeting spacing standards, installation of a rectangular rapid flashing beacon at the Torbank crossing, new curb and sidewalk treatments, a speed reduction from 35 mph to 30 mph, and an all-way stop at River Road/Courtney Avenue. Collectively, these changes address the original safety concerns that gave rise to Condition #6. A Transportation Planning Rule (TPR) addendum prepared by Lancaster Mobley (August 19, 2025) concludes that the transportation system is now adequate and safe to support future development, and that Condition #6 is no longer warranted. This application therefore requests removal of Condition #6 as part of the proposed amendment.

## **CHAPTER 6 -- HOUSING**

### **Policy 6.A.1**



*Encourage development that will provide a range of choices in housing type, design, and price and rent level throughout the urban areas of the County.*

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from Low Density Residential (R-10) to High Density Residential (HDR) directly supports this policy by enabling a more efficient use of a 1.19-acre site adjacent to existing infrastructure and services. The HDR designation allows for increased residential density, which can support a wider variety of housing formats and affordability levels—including independent or assisted senior housing, apartments, or other attached housing types. These forms of development are not feasible under the current R-10 zoning. This proposal also advances housing choice for older adults and individuals with fixed or moderate incomes, in alignment with the ongoing evolution of the Rose Villa Senior Living campus. By facilitating additional housing units in a location already served by transit and services, the amendment helps meet County goals for equitable and diverse housing opportunities in an urban context.

**Policy 6.A.7**

*Encourage a wide range of housing alternatives for the elderly or handicapped.*

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from Low Density Residential (R-10) to High Density Residential (HDR) directly supports this policy by enabling the expansion of the Rose Villa Senior Living campus. Rose Villa is an established residential and care community for older adults, offering a continuum of housing and supportive services that accommodate a wide range of physical, cognitive, and lifestyle needs. Rezoning the adjacent properties will allow for the creation of additional age-friendly housing options, including independent living, assisted living, and accessible residential units—housing types that are critical to addressing the evolving needs of Clackamas County’s aging population. The proposal promotes inclusive, senior-oriented development in a walkable, transit-accessible location, and contributes to a diverse and adaptable housing stock for vulnerable populations. Therefore, the proposed amendment is consistent with and advances the objectives of Policy 6.A.7 by encouraging intentional and context-sensitive expansion of housing alternatives for elderly and disabled residents.

**CHAPTER 7 – PUBLIC FACILITIES AND SERVICES**

**Policy 7.A.1**

*Recognize County responsibility for operating, planning and regulating wastewater systems as designated in the approved Sewerage Facilities Master Plan.*

**Policy 7.A.2**

*Recognize that Clackamas County Service District No. 1, Tri-City Service District, Oak Lodge Sanitary District, the Unified Sewerage Agency and the City of Portland have responsibility for operating, planning, and regulating wastewater systems as designated in the approved Sewerage Facilities Master Plan.*

**Finding:** The subject site is located within the service area of Oak Lodge Water Services District (OLWSD), the entity responsible for the planning, regulation, and operation of wastewater services for this portion of unincorporated Clackamas County. This structure is recognized in the County’s Sewerage Facilities Master Plan, which designates specific service providers for defined geographies within the Urban Growth Boundary. A Preliminary Statement of Feasibility from OLWSD confirms that sufficient wastewater capacity



exists to support development under the proposed High Density Residential (HDR) zoning. As such, the proposed zone change is consistent with Policies 7.A.1 and 7.A.2, ensuring wastewater needs will be met through a coordinated and approved service structure.

## **CHAPTER 8 – ECONOMIC DEVELOPMENT**

### **Policy 8.A.3**

*Facilitate the efficient operation of existing firms in the urban area by giving high priority to equality in public services including law enforcement, water service and fire protection, storm drainage, sewer, transit, pedestrian and bike access, road maintenance, and traffic access and circulation.*

**Finding:** The Rose Villa campus is a well-established institution and employer in the Oak Grove area. The proposed zone change will facilitate campus expansion and operational efficiency by co-locating new senior housing adjacent to existing facilities. The site is fully served by sewer, water, and transportation infrastructure, aligning with the intent of Policy 8.A.3.

## **ZONING AND DEVELOPMENT ORDINANCE (ZDO)**

### **ZDO SECTION 1202 (ZONE CHANGES)**

#### **1202.03 General Approval Criteria**

*A zone change requires review as a Type III or IV application pursuant to Section 1307, Procedures, and shall be subject to the following standards and criteria:*

- A. The proposed zone change is consistent with the applicable goals and policies of the Comprehensive Plan.*

**Response:** The proposed zone change from Low Density Residential (R-10) to High Density Residential (HDR) is consistent with the applicable goals and policies of the Clackamas County Comprehensive Plan, as required under ZDO Section 1202.03(A). The proposed amendment supports Chapter 4, Policy 4.U.1, which establishes criteria for areas eligible for HDR designation. The subject site meets the required criteria by being adjacent to an employment concentration (Rose Villa Senior Living campus), having direct access to a minor arterial (SE River Road), and being free from mapped environmental hazards such as floodplains or unstable soils.

The proposal also aligns with Chapter 5, Policy 5.F.6, and satisfies the Transportation Planning Rule (OAR 660-012-0060), as demonstrated by a submitted traffic analysis showing a projected net increase of only 152 daily vehicle trips—well below the threshold for a significant effect.

Additionally, the proposal supports housing goals in Chapter 6, including Policy 6.A.1, which encourages a diverse range of housing types and densities, and Policy 6.A.7, which promotes housing alternatives for the elderly and persons with disabilities. The proposed HDR zoning will facilitate senior-oriented housing options as part of Rose Villa’s expansion, helping meet community needs for accessible and age-friendly housing.



Finally, the proposed amendment is consistent with Statewide Planning Goals 10 (Housing) and 12 (Transportation), both of which are mirrored in the Comprehensive Plan and are further supported by the project's location, density potential, and minimal transportation impact. Therefore, the proposed zone change is consistent with the County's Comprehensive Plan as required by ZDO Section 1202.03(A).

- B. If development under the proposed zoning district designation has a need for any of the following public services, the need can be accommodated with the implementation of the applicable service provider's existing capital improvement plan: sanitary sewer, surface water management, and water. The cumulative impact of the proposed zone change and development of other properties under existing zoning designations shall be considered.*

**Response:** The subject properties are located within the service boundaries of Oak Lodge Water Services District (OLWSD), which provides sanitary sewer, water, and surface water management services. A completed Preliminary Statement of Feasibility has been submitted with this application to demonstrate the availability of these services for future development under the proposed High Density Residential (HDR) zoning. The Statement confirms that:

- Adequate sanitary sewer capacity is available in both the treatment system and collection infrastructure to serve the proposed development.
- Water service, including fire flows, is available or can be made available through developer-initiated improvements, if necessary.
- Surface water management, treatment, and conveyance can also be provided to serve the site.

There are no conditions of approval or service limitations noted by the provider, indicating that the zone change will not require upgrades outside of what is anticipated in the District's existing Capital Improvement Plan (CIP). Furthermore, the proposed increase in density—up to 29 units—is relatively modest and located within a fully urbanized service area, minimizing the risk of cumulative impacts to system capacity. Accordingly, the proposed zone change meets the public service adequacy requirements outlined in ZDO Section 1202.03(B).

- C. The transportation system is adequate and will remain adequate with approval of the proposed zone change. For the purpose of this criterion:*
- 1. Adequate means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, Motor Vehicle Capacity Evaluation Standards for the Urban Area, and 5-2b, Motor Vehicle Capacity Evaluation Standards for the Rural Area.*
  - 2. The evaluation of transportation system adequacy shall be conducted pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012- 0060).*
  - 3. It shall be assumed that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.*
  - 4. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.*



5. *The adequacy standards shall apply to all roadways and intersections within the impact area of the proposed zone change. The impact area shall be identified pursuant to the Clackamas County Roadway Standards.*
6. *A determination regarding whether submittal of a transportation impact study is required shall be made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.*
7. *Notwithstanding Subsections 1202.03(C)(4) through (6), motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODOT Transportation Analysis Procedures Manual for roadways and intersections under the jurisdiction of the State of Oregon.*

**Response:** The proposed zone change complies with ZDO Section 1202.03(C). This criterion requires a demonstration that the transportation system is and will remain adequate following the zone change, as defined by the volume-to-capacity (v/c) ratio and level of service (LOS) standards adopted in the Clackamas County Comprehensive Plan and implemented through the Transportation Planning Rule (OAR 660-012-0060). A Transportation Planning Rule (TPR) compliance analysis was prepared by a qualified transportation engineer and submitted with this application. The analysis evaluated a reasonable worst-case development scenario, assuming the site is developed with the highest trip-generating land use permitted outright under HDR zoning. The study compared anticipated trip generation under both the existing R-10 zoning (6 single-family units) and the proposed HDR zoning (29 multifamily units).

The results indicate that the proposed HDR zoning would generate a net increase of approximately 152 weekday vehicle trips, including 9 AM peak hour and 12 PM peak hour trips. This increase is well within the 400 daily trip threshold set by the Oregon Highway Plan (OHP) and OAR 660-012-0060 for determining a “significant effect” on transportation facilities. As such, the project qualifies as generating a “small increase” in traffic, and no degradation of v/c ratios or LOS is anticipated. Crash history was also evaluated for the nearby intersection at SE River Road and SE Torbank Road. Only three crashes were recorded within a 1,000-foot segment over a five-year period, with no systemic safety concerns identified. This further supports the conclusion that the transportation system is capable of safely accommodating the proposed zone change.

No mitigation measures or capacity improvements are required. Therefore, the transportation system is adequate and will remain adequate, consistent with the criteria and procedures outlined in ZDO 1202.03(C), the Clackamas County Roadway Standards, and the ODOT Transportation Analysis Procedures Manual for state facilities.

- D. *Safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.*

**Response:** The proposed zone change meets the requirements of ZDO Section 1202.03(D), which requires that the safety of the transportation system is adequate to serve the level of development allowed under the proposed zoning. A Transportation Planning Rule (TPR) compliance memo, prepared by a licensed transportation engineer, included a crash history review for the segment of SE River Road near the site as well as the intersection at SE River Road and SE Torbank Road. The analysis covered the most recent five-



year period (2019–2023) using data from the Oregon Department of Transportation’s Crash Data System. Three crashes were reported within the study area:

- One pedestrian-involved crash (Injury B), caused by a fatigued driver.
- One fixed-object crash (property damage only).
- One improper backing crash at the SE River Rd/SE Torbank Rd intersection (property damage only).

These isolated incidents do not indicate a pattern of concern or systemic safety deficiency. There were no fatal crashes, and no crash clusters or repeat conflict types were identified. The crash frequency and types are consistent with what would be expected on similar minor arterial corridors with mixed residential and institutional uses. The TPR analysis concludes that the projected net increase of 152 daily vehicle trips associated with the proposed HDR zoning constitutes a small increase in traffic, per Oregon Highway Plan thresholds, and does not degrade safety. Therefore, the transportation system is considered safe and adequate to accommodate the anticipated level of development, and the proposal meets the requirements of ZDO Section 1202.03(D).

In addition to the crash history analysis, this application directly addresses Condition #6 from Z0148-09-D. The improvements noted above, combined with a lack of systemic crash patterns, demonstrate that safety of the transportation system is adequate without requiring elimination of east-side operations. Therefore, the proposed amendment satisfies ZDO 1202.03(D) and provides a basis for removal of Condition #6.



### **III. APPLICATION SUBMITTAL NARRATIVE RESPONSES**

---

1. How is your proposal consistent with applicable Statewide Planning Goals?

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from R-10 to HDR is consistent with applicable Statewide Planning Goals. It aligns with Goal 1 (Citizen Involvement) by utilizing Clackamas County's public land use process, including a Type III review with public notice and hearings. It complies with Goal 2 (Land Use Planning) through a fact-based application supported by coordinated service provider input and transportation analysis. Most critically, it advances Goal 10 (Housing) by increasing housing capacity within the UGB and supporting senior housing. The proposal meets Goal 11 (Public Facilities and Services) by providing documentation from OLWSD confirming adequate utility capacity, and Goal 12 (Transportation) by submitting a Transportation Planning Rule (TPR) analysis showing no significant impact to system performance or safety.

2. How is your proposal consistent with the applicable goals and policies of the County's Comprehensive Plan?

**Response:** This proposal supports multiple goals and policies in Clackamas County's Comprehensive Plan. In Chapter 4, it meets Policy 4.U.1 by proposing HDR near employment and services, with access to a minor arterial and no natural hazard constraints. It supports Chapter 6 housing policies by enabling senior-focused development that diversifies housing choices and increases density on underutilized land. Public facilities policies in Chapter 7 are addressed through OLWSD's feasibility confirmation, and transportation policies in Chapter 5 are satisfied through a TPR-compliant analysis. The proposal also aligns with Chapter 2's citizen involvement requirements by following the County's public review process. Collectively, these findings demonstrate consistency with the Comprehensive Plan.

3. If relevant, how is your proposal consistent with Metro's Urban Growth Management Function Plan?

**Response:** The proposal complies with Metro's Urban Growth Management Functional Plan Titles 1 and 12. Under Title 1, it increases housing capacity within the UGB, from a maximum of 6 units to approximately 29, aligning with Metro's regional housing targets without displacing existing households. The HDR designation supports infill development near services, transit, and employment. Under Title 12, the proposal protects neighborhood character by locating low-impact senior housing next to the Rose Villa campus and minimizing new traffic on local streets. It expands housing options for seniors in a way that promotes stability and equitable access, consistent with Metro's livability goals.

4. If development under the proposed zone would need public services (sanitary sewer, surface water management, and water), could the need be accommodated with the implementation of the applicable service provider's existing capital improvement plan? The cumulative impact of the proposed zone change and development of other properties under existing zoning designations must be considered.

**Response:** Yes, proposal is supported by a Preliminary Statement of Feasibility from the Oak Lodge Water Services District (OLWSD), which confirms that sanitary sewer, stormwater, and potable water services are available to support HDR development on the 1.19-acre site. The proposed 29 units represent a modest increase in demand and do not require infrastructure upgrades beyond what is anticipated in OLWSD's



Capital Improvement Plan. The site is within a fully urbanized service area, and there are no cumulative impacts expected from this or other nearby developments that would compromise utility service delivery.

5. Explain how the transportation system is adequate and will remain adequate with approval of the proposed zone change. This explanation should take into consideration the following:
- a. “Adequate” means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, *Motor Vehicle Capacity Evaluation Standards for the Urban Area*, and 5-2b, *Motor Vehicle Capacity Evaluation Standards for the Rural Area*.
  - b. Conduct the evaluation of transportation system adequacy pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).
  - c. Assume that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.
  - d. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.
  - e. The adequacy standards apply to all roadways and intersections within the impact area of the proposed zone change. The impact area is identified based on the Clackamas County Roadway Standards.
  - f. A determination of whether submittal of the transportation impact study is required is made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.
  - g. (d) through (f) above do not apply to roadways and intersections under the jurisdiction of the State of Oregon. Instead, motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODOT Transportation Analysis Procedures Manual for such roadways and intersections.

**Response:** The proposed zone change from Low Density Residential (R-10) to High Density Residential (HDR) has been evaluated for transportation system adequacy pursuant to the Transportation Planning Rule (TPR), OAR 660-012-0060, and the standards set forth in Clackamas County’s Comprehensive Plan Tables 5-2a (Urban Area Motor Vehicle Capacity Evaluation Standards) and County Roadway Standards.

A Transportation Planning Rule Memo prepared by a licensed traffic engineer evaluates the impact of the proposed zoning under a reasonable worst-case development scenario—29 senior housing units, based on the highest trip-generating allowed residential use under HDR zoning. The trip generation analysis follows Institute of Transportation Engineers (ITE) Trip Generation Manual standards and assumes maximum development potential, as required. The TPR memo concludes that the proposed zone change would result in a net increase of 152 average daily trips and 10 weekday PM peak hour trips, which is well below the 400 daily trip threshold considered a “significant effect” under OAR 660-012-0060(2). Therefore, the proposal does not require mitigation or trigger improvements to the transportation system. All roadways and intersections within the impact area—identified pursuant to Clackamas County Roadway Standards and the ODOT Transportation Analysis Procedures Manual for River Road (a minor arterial under ODOT jurisdiction)—are projected to operate within acceptable volume-to-capacity (v/c) ratios and Level of Service (LOS) thresholds. Because the net increase in trips is minor and the affected facilities will continue to meet adopted performance measures, the transportation system is considered adequate and will remain adequate following approval of the proposed zone change, consistent with ZDO Section 1202.03(C) and applicable state and local transportation planning rules.



6. Explain how the safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.

**Response:** The safety of the transportation system is adequate to support the level of development anticipated under the proposed zone change from Low Density Residential (R-10) to High Density Residential (HDR). The Transportation Planning Rule (TPR) Memo prepared by a licensed traffic engineer includes a review of crash data provided by ODOT's Crash Analysis and Reporting Unit for SE River Road, the primary access route to the site. The analysis did not identify any systemic safety concerns, such as high crash frequencies or collision patterns, at intersections or segments within the project's impact area. Access to the site is proposed via SE Torbank Road, a local street intersecting with SE River Road, which is a minor arterial. The proposed senior-oriented residential use is expected to generate lower vehicle speeds and volumes than typical multifamily developments, thereby contributing minimally to potential conflicts at access points. The intersection of SE Torbank Road and SE River Road provides adequate sight distance and turning movement capacity, and no safety mitigation measures were identified as necessary.

Overall, the transportation system provides safe vehicular and pedestrian access to and from the site and will continue to operate safely under the proposed HDR zoning. This satisfies ZDO Section 1202.03(D) by demonstrating that the existing system is sufficient to serve the expected development without compromising safety for all travel modes.

The applicant has conferred with County Engineering staff to ensure the traffic study and addendum adequately address safety and access management concerns. If further refinement of the analysis is recommended, the applicant will provide supplemental documentation as needed to support this request for removal of Condition #6.



## IV. CONCLUSION

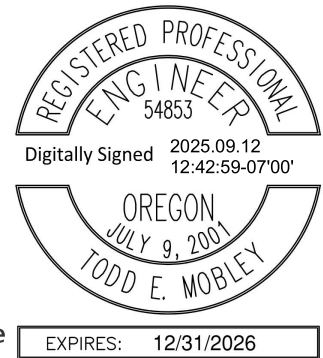
---

This summary of request and attachments demonstrates compliance with applicable approval criteria. The applicant respectfully requests that the County approve this application.



## Memorandum

To: **Martha Fritzie, Clackamas County**  
Copy: **Thuy Cao, HHPR**  
From: **Todd E. Mobley, PE**  
Date: **September 12, 2025**  
Subject: **Z0247-25 & Z0248-25 Rose Villa Comprehensive Plan Amendment & Zone Change  
Response to Incompleteness Notice & Transportation Analysis Addendum**



---

## Introduction

This memorandum is written in response to the Notice of Incomplete Type III Land Use Application mailed on July 9, 2025. As explained below, this memorandum also serves as an addendum to the original Transportation Planning Rule Analysis prepared by Lancaster Mobley and dated June 11, 2025.

Item B of the incompleteness notice states the following:

- B. Addressing condition of approval in Z0148-09-D (master plan) and transportation system safety:** *In 2009, the county approved a "master plan" for a multi-phased campus for Rose Villa on the west side of River Rd, with the following findings:*

*Access for the site, as illustrated and described in the master plan documents, is generally acceptable to Engineering staff. Staff has agreed to the proposed access scenario, which required a deviation from County standards for the multiple direct accesses to River Road, several of which also do not meet access spacing guidelines. This deviation was determined to be appropriate mainly due to the applicant's agreement to initially scale down and eventually eliminate operations on the easterly side of River Road. The anticipated safety improvement, resulting from fewer crossings of River Road by pedestrians and vehicles, is the principal reason additional accesses will be recommended for approval to River Road.*

*And the following condition:*

*6) The applicant shall meet or exceed the plans, goals, and time lines associated with the elimination of the East Property Operations, provided in the narrative on page eight of the June 2, 2009, submittal. Note that the "submittal" referenced here specifically identifies the property on the corner of SE River and SE Torbank (one of the properties involved in this new proposal Z0247-25 & Z0248-25). See Z0148-09-D attached.*

The notice goes on to say that the application will need to address Condition #6 above and may request the removal or modification of the condition if there is a basis to support its removal or modification.

## Condition #6 in Z0148-09-D

At the time of the master plan approval in 2009, it was the intent of Rose Villa to accommodate all associated land uses on the west side of River Road, at which time they would divest properties on the east side of River Road. The current application includes the rezone of property on the east side of River Road, which is incongruent with the prior intent of the master plan and the resulting Condition #6.

The root of the concern in 2009 was related to transportation safety and access management. At the time, the proposed access configuration required a deviation from County standards for multiple direct accesses to River Road, several of which did not meet access spacing standards. River Road is classified as a Minor Arterial, and as such, direct access is discouraged, and access spacing standards are in place to preserve mobility and arterial throughput. The prior approval of the access proposed in the master plan was based in part on the stated intent of moving operations to the west side of River Road, thereby reducing pedestrian crossings and improving safety.

## Significant Infrastructure Improvements

Conditions along River Road have changed considerably since 2009 when the master plan was approved. Below is a summary and timeline of the relevant changes:

1. Rose Villa development on the west side of River Road reduced direct driveway access to only two locations, which meet applicable access spacing standards. Frontage improvements were constructed in 2015 that established the current configuration.
2. The marked pedestrian crossing on River Road at the Torbank Road intersection was upgraded with a rectangular rapid flashing beacon (RRFB) in 2015.
3. Beginning in 2015 and then completed in 2020, access control was established in the southeast corner of the intersection of River Road and Torbank Road with construction of new curb and sidewalk.
4. The speed zone on River Road from the north end of the site south to Courtney Avenue was reduced from 35 mph to 30 mph by an ODOT speed zone order in 2021.
5. The intersection of Courtney Avenue at River Road south of the site was converted to all-way stop control in 2024. This improvement has helped control speed in the neighborhood and also serves to meter northbound traffic along the Rose Villa site frontage.

As summarized above, the changes along River Road since the approval of the master plan and the adoption of Condition #6 above have significantly improved transportation safety and operations in the neighborhood that support the removal of Condition #6.

## Approval Criterion

Safety in the context of the current zone change application is addressed in ZDO 1202.03(D), which states:

- D. Safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.*

The June 11, 2025 Transportation Analysis also examined the crash history in the project study area and found



no significant crash history or trends that are indicative of a systemic safety problem. The current application is only for a change in zoning, not for a specific development approval. Consistent with the June 11<sup>th</sup> analysis, we continue to recommend that the safety and operation of the pedestrian crossing on River Road and the Torbank Road intersection be evaluated again at the time of development.

## Summary and Conclusion

Because River Road now meets current design and safety standards, it is no longer necessary to move all Rose Villa operations to the west side of River Road. Access management and safety are no longer substandard. With ongoing development, applicable County standards should be satisfied, but the additional provision of Condition #6 from Z0148-09-D is no longer relevant it is recommended that the condition be removed.

Further, the analysis and examination of transportation safety in this addendum as well as the original June 11, 2025 report demonstrate that the transportation system is adequate to serve the level of development anticipated by the proposed zone change. ZDO 1202.03(D) is satisfied.





Planning and Zoning  
Department of Transportation and Development  
Development Services Building  
150 Beaver Creek Road | Oregon City, OR 97045  
503-742-4500 | zoninginfo@clackamas.us  
www.clackamas.us/planning

STAFF USE ONLY

Land use application for:

## COMPREHENSIVE PLAN MAP AMENDMENT & ZONE CHANGE

Staff Initials: File Number:

Application Fee: \$14,920 (+\$150 for expanded notification area if the property is in the AG/F, EFU, FF-10, FU-10, RA-1, RA-2, RC, RI, RR, RRRF-5, or TBR zone)

### APPLICANT INFORMATION

|                                                              |                                    |                                            |               |
|--------------------------------------------------------------|------------------------------------|--------------------------------------------|---------------|
| Applicant name:<br>HHPR, Inc. (Attn: Thuy Cao, AICP)         | Applicant email:<br>thuyc@hhpr.com | Applicant phone:<br>(503)221-1131 ext. 154 |               |
| Applicant mailing address:<br>205 SE Spokane Street, STE 200 | City:<br>Portland                  | State:<br>OR                               | ZIP:<br>97202 |
| Contact person name (if other than applicant):               | Contact person email:              | Contact person phone:                      |               |
| Contact person mailing address:                              | City:                              | State:                                     | ZIP:          |

### PROPOSAL

|                                                                                                                                                                                         |                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| Brief description of proposal:<br>Proposal to redesignate and rezone two properties adjacent to the existing Rose Villa Senior Living campus from R-10 to HDR for future redevelopment. | Pre-application conference file number:<br>ZPAC0114-24 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|

### SITE INFORMATION

|                                                                                                                                                                      |                                                                  |                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|--------------------------|
| Site address:<br>1802 SE Torbank Rd. and 13614 SE River Rd. (please see map)                                                                                         | Comprehensive Plan designation:<br>Low Density Residential (LDR) | Zoning district:<br>R-10 |
| Map and tax lot #:<br>Township: 2S Range: 1E Section: 02DA Tax Lot: 3400<br>Township: 2S Range: 1E Section: 02DA Tax Lot: 3500<br>Township: Range: Section: Tax Lot: | Land area:<br>1.19 acres                                         |                          |
| Adjacent properties under same ownership:<br>Township: Range: Section: Tax Lot:<br>Township: Range: Section: Tax Lot:                                                |                                                                  |                          |

|                                                                                                                                                                                     |                                        |                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|--------------------|
| Printed names of all property owners:<br>GLEN LEWIS                                                                                                                                 | Signatures of all property owners:<br> | Date(s):<br>9/4/25 |
| I hereby certify that the statements contained herein, along with the evidence submitted, are in all respects true and correct to the best of my knowledge.<br>Applicant signature: |                                        | Date: 6/3/25       |

## A. Complete a pre-application conference:

You must attend a pre-application conference with Planning and Zoning staff before filing this application. [Information about the pre-application conference](#) process and a request form are available from the Planning and Zoning website.

## B. Review applicable land use rules:

This application is subject to the provisions of [Section 1202, Zone Changes](#) of the [Clackamas County Zoning and Development Ordinance](#) (ZDO).

It is also subject to the ZDO's definitions, procedures, and other general provisions, as well as to the specific rules of the subject property's zoning district and applicable development standards, as outlined in the ZDO.

## C. Turn in the following:

- ☒ **Complete application form:** Respond to all the questions and requests in this application, and make sure all owners of the subject property sign the first page of this application. Applications without the signatures of *all* property owners are incomplete.
- ☒ **Application fee:** The cost of this application is **\$14,920, plus a \$150 notification surcharge if an expanded notification area is required by ZDO Section 1307**. Payment can be made by cash, by check payable to "Clackamas County", or by credit/debit card with an additional card processing fee using the [Credit Card Authorization Form](#) available from the Planning and Zoning website. Payment is due when the application is submitted. Refer to the FAQs at the end of this form and to the adopted [Fee Schedule](#) for refund policies.
- ☒ **Vicinity map:** Provide a map of the area around the property, drawn to scale, that shows the uses and location of improvements on adjacent properties and properties across any road.
- ☒ **Site plan:** Provide a site plan (also called a plot plan). A [Site Plan Sample](#) is available from the Planning and Zoning website. The site plan must be accurate and drawn to-scale on paper measuring no larger than 11 inches x 17 inches. The site plan must illustrate all of the following (when applicable):
  - Lot lines, lot/parcel numbers, acreage/square footage of lots, and contiguous properties under the same ownership;
  - All existing and proposed structures, fences, roads, driveways, parking areas, and easements, each with identifying labels and dimensions;
  - Setbacks of all structures from lot lines and easements;
  - Significant natural features (rivers, streams, wetlands, slopes of 20% or greater, geologic hazards, mature trees or forested areas, drainage areas, etc.); and
  - Location of utilities, wells, and all onsite wastewater treatment facilities (e.g., septic tanks, septic drainfield areas, replacement drainfield areas, drywells).
- ☒ **Service Feasibility Determinations:** Request that the property's water provider, sanitary sewer provider, and surface water management authority, as applicable, each complete a [Preliminary Statement of Feasibility](#) and include those completed statements with your application. If the proposed development will be served by an onsite wastewater treatment system (e.g., a septic system), include an approved Site Evaluation or Authorization Notice from the [Septic & Onsite Wastewater Program](#) attesting to the feasibility of your proposal.
- ☒ **Transportation impact study:** Refer to the information provided at the pre-application conference regarding the need for a transportation impact study. Include a copy of any required study with your application submittal.
- ☒ **Any additional information or documents advised of during the pre-application conference**

**D. Answer the following questions:**

1. What Comprehensive Plan designation are you requesting for the subject property?

Requested Plan designation: High Density Residential

2. What zoning district designation are you requesting for the subject property?

Requested zoning district: HDR

3. If the zoning designation you requested in response to Question 2 cannot be approved because the property doesn't meet the approval criteria, would you like an alternate zoning district designation to be considered?

☒ NO

☐ YES, and the alternate zoning district designation(s) I would like is/are:

\_\_\_\_\_

4. Are you filing this Comprehensive Plan Map amendment and zone change application with another application (e.g., an application for a partition or subdivision)?

☒ NO, this application is being filed alone.

☐ YES, this application is being filed with another application. That other application requests the following:

\_\_\_\_\_

## **D. Respond in a narrative:**

Your application submittal must include a narrative that fully responds to the following. Due to the technical nature of these requirements, guidance on how best to respond will be provided during the required pre-application conference.

1. How is your proposal consistent with applicable Statewide Planning Goals?
2. How is your proposal consistent with the applicable goals and policies of the County's [Comprehensive Plan](#)?
3. If relevant, how is your proposal consistent with Metro's Urban Growth Management Functional Plan?
4. If development under the proposed zone would need public services (sanitary sewer, surface water management, and water), could the need be accommodated with the implementation of the applicable service provider's existing capital improvement plan? The cumulative impact of the proposed zone change and development of other properties under existing zoning designations must be considered.
5. Explain how the transportation system is adequate and will remain adequate with approval of the proposed zone change. This explanation should take into consideration the following:
  - a. "Adequate" means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, *Motor Vehicle Capacity Evaluation Standards for the Urban Area*, and 5-2b, *Motor Vehicle Capacity Evaluation Standards for the Rural Area*.
  - b. Conduct the evaluation of transportation system adequacy pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).
  - c. Assume that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.
  - d. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.
  - e. The adequacy standards apply to all roadways and intersections within the impact area of the proposed zone change. The impact area is identified based on the Clackamas County Roadway Standards.
  - f. A determination of whether submittal of a transportation impact study is required is made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.
  - g. (d) through (f) above do not apply to roadways and intersections under the jurisdiction of the State of Oregon. Instead, motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the

ODOT Transportation Analysis Procedures Manual for such roadways and intersections.

6. Explain how the safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.

## **FAQs**

### **What is a Comprehensive Plan Map amendment and zone change?**

All land in the County has been divided into mapped Comprehensive Plan designations, each of which corresponds to one or more zoning districts. A Comprehensive Plan Map amendment and zone change results in a property switching from one Comprehensive Plan Map designation and zoning district to another designation and zoning district, which may change allowed uses, minimum lot size, and other development standards.

### **What is the permit application process?**

Comprehensive Plan Map amendments and zone changes that are *not* related to the Historic Landmark, Historic District, and Historic Corridor overlay district are subject to a "Type III" land use application process, as provided for in [Section 1307](#) of the ZDO. Type III decisions include notice to owners of nearby land, the Community Planning Organization (if active), service providers (sewer, water, fire, etc.), and affected government agencies, and are reviewed at public hearings before the Planning Commission and the Board of County Commissioners (BCC). If the application is approved, the applicant must comply with any conditions of approval identified in the decision. The County's decision can be appealed to the Oregon Land Use Board of Appeals (LUBA).

### **What is needed for the County to approve a land use permit?**

Comprehensive Plan Map amendments and zone changes *may* be permitted after an evaluation of applicable standards by staff, the Planning Commission, and the BCC. The applicant is responsible for providing evidence that their proposal does or can meet those standards. In order to address the standards, the information requested in this application should be as thorough and complete as possible. A permit will only be approved or denied after a complete application is received and reviewed. The BCC approves an application only if it finds that the proposal meets the standards or can meet the standards with conditions.

### **How long will it take the County to make a decision about an application?**

A final decision on an application for a Comprehensive Plan Map amendment and zone change is generally issued within 24 weeks (168 days) of when we deem the application to be complete. However, these applications are often highly complex and may take longer to process.

### **If an application is submitted and then withdrawn, will a refund be given?**

The fee for this application includes a \$3,830 fee for review by the Hearings Officer, which will be fully refunded if the application is withdrawn before the hearing occurs. If the submitted Type III application is withdrawn before it is publicly noticed, 75% of the portion of the application fee paid that is not the Hearings Officer review fee (i.e., the remainder), or the remainder minus \$250, whichever is less, will be refunded. If a submitted application is withdrawn after it is publicly noticed, but before a staff report is issued, 50% of the remainder, or \$500, whichever is less, will be refunded. No refund on the remainder will be given after a staff report is issued.

### **Who can help answer additional questions?**

For questions about the County's land use permit requirements and this application form, contact Planning and Zoning at **503-742-4500** or [zoninginfo@clackamas.us](mailto:zoninginfo@clackamas.us). You can also find information online at the Planning and Zoning website: [www.clackamas.us/planning](http://www.clackamas.us/planning).

*Clackamas County is committed to providing meaningful access and will make reasonable accommodations, modifications, or provide translation, interpretation or other services upon request. Please contact us at 503-742-4545 or [drenhard@clackamas.us](mailto:drenhard@clackamas.us).*

**503-742-4545:** ¿Traducción e interpretación? | Требуется ли вам устный или письменный перевод?

翻译或口译? | Cần Biên dịch hoặc Phiên dịch? | 번역 또는 통역?

**ROSE VILLA, INC.**

**BOARD RESOLUTION 24-01-Amended**

**RE: SIGNING AUTHORITY TO CONDUCT BUSINESS**

**WHEREAS**, Rose Villa, Inc. desires to grant signing authority to conduct business for Rose Villa, Inc., to certain person(s) described hereunder.

**RESOLVED**, that the Board of Directors is hereby authorized and approved to grant signing and authority to conduct business to any one of the following persons:

Glen Lewis, CEO

The foregoing signing and authority granted shall include, but shall not be limited to, the execution of permits and permit applications, Deeds, powers of attorney, transfers, assignments, contracts, obligations, income and property tax matters, certificates, and other instruments of whatever nature entered into by this Corporation.

**FURTHER RESOLVED**, the Board of Directors of Rose Villa, Inc. hereby grants permission to any one of the following to sign checks on behalf of Rose Villa, Inc.

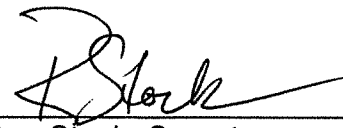
Glen Lewis, CEO  
Erin Cornell, Director of Health Services

**FURTHER RESOLVED**, the Board of Directors of Rose Villa, Inc. hereby grants permission to any one of the following Senior Managers to act alone on behalf of Rose Villa, Inc., to sign contracts that do not exceed \$25,000 and do not exceed one year in length:

Erin Cornell, Director of Health Services  
Jim Willeford, Director of Strategic Operations

**Amended version adopted by the Board of Directors of Rose Villa  
December 12, 2024**

  
\_\_\_\_\_  
Wade Clowes, Board President  
Rose Villa, Inc.

  
\_\_\_\_\_  
Ron Stock, Secretary  
Rose Villa, Inc.





Planning and Zoning  
Department of Transportation and Development  
Development Services Building  
150 Beaver Creek Road | Oregon City, OR 97045  
503-742-4500 | zoninginfo@clackamas.us  
www.clackamas.us/planning

STAFF USE ONLY

RECEIVED

Jun 23 2025

Clackamas County  
Planning & Zoning Division

Staff Initials: File Number:  
Z0247-25

Land use application for:

## COMPREHENSIVE PLAN MAP AMENDMENT & ZONE CHANGE

Application Fee: \$14,920 (+\$150 for expanded notification area if the property is in the AG/F, EFU, FF-10, FU-10, RA-1, RA-2, RC, RI, RR, RRF-5, or TBR zone)

### APPLICANT INFORMATION

|                                                              |                                      |                                            |               |
|--------------------------------------------------------------|--------------------------------------|--------------------------------------------|---------------|
| Applicant name:<br>HHP, Inc. (Attn: Thuy Cao, AICP)          | Applicant email:<br>thuycao@hhpr.com | Applicant phone:<br>(503)221-1131 ext. 154 |               |
| Applicant mailing address:<br>205 SE Spokane Street, STE 200 | City:<br>Portland                    | State:<br>OR                               | ZIP:<br>97202 |
| Contact person name (if other than applicant):               | Contact person email:                | Contact person phone:                      |               |
| Contact person mailing address:                              | City:                                | State:                                     | ZIP:          |

### PROPOSAL

|                                                                                                                                                                                         |                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| Brief description of proposal:<br>Proposal to redesignate and rezone two properties adjacent to the existing Rose Villa Senior Living campus from R-10 to HDR for future redevelopment. | Pre-application conference file number:<br>ZPAC0114-24 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|

### SITE INFORMATION

|                                                                                                                                                                      |                                                                  |                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|--------------------------|
| Site address:<br>1802 SE Torbank Rd. and 13614 SE River Rd. (please see map)                                                                                         | Comprehensive Plan designation:<br>Low Density Residential (LDR) | Zoning district:<br>R-10 |
| Map and tax lot #:<br>Township: 2S Range: 1E Section: 02DA Tax Lot: 3400<br>Township: 2S Range: 1E Section: 02DA Tax Lot: 3500<br>Township: Range: Section: Tax Lot: | Land area:<br>1.19 acres                                         |                          |
| Adjacent properties under same ownership:<br>Township: Range: Section: Tax Lot:<br>Township: Range: Section: Tax Lot:                                                |                                                                  |                          |

|                                                                                                                                                             |                                        |                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|----------------------|
| Printed names of all property owners:<br>JAMES P. WILLEFORD                                                                                                 | Signatures of all property owners:<br> | Date(s):<br>3 JUN 25 |
| I hereby certify that the statements contained herein, along with the evidence submitted, are in all respects true and correct to the best of my knowledge. |                                        |                      |
| Applicant signature:<br>                                                                                                                                    | Date: 6/3/25                           |                      |

## A. Complete a pre-application conference:

You must attend a pre-application conference with Planning and Zoning staff before filing this application. [Information about the pre-application conference](#) process and a request form are available from the Planning and Zoning website.

## B. Review applicable land use rules:

This application is subject to the provisions of [Section 1202, Zone Changes](#) of the [Clackamas County Zoning and Development Ordinance](#) (ZDO).

It is also subject to the ZDO's definitions, procedures, and other general provisions, as well as to the specific rules of the subject property's zoning district and applicable development standards, as outlined in the ZDO.

## C. Turn in the following:

- ☒ **Complete application form:** Respond to all the questions and requests in this application, and make sure all owners of the subject property sign the first page of this application. Applications without the signatures of *all* property owners are incomplete.
- ☒ **Application fee:** The cost of this application is **\$14,920, plus a \$150 notification surcharge if an expanded notification area is required by ZDO Section 1307**. Payment can be made by cash, by check payable to "Clackamas County", or by credit/debit card with an additional card processing fee using the [Credit Card Authorization Form](#) available from the Planning and Zoning website. Payment is due when the application is submitted. Refer to the FAQs at the end of this form and to the adopted [Fee Schedule](#) for refund policies.
- ☒ **Vicinity map:** Provide a map of the area around the property, drawn to scale, that shows the uses and location of improvements on adjacent properties and properties across any road.
- ☒ **Site plan:** Provide a site plan (also called a plot plan). A [Site Plan Sample](#) is available from the Planning and Zoning website. The site plan must be accurate and drawn to-scale on paper measuring no larger than 11 inches x 17 inches. The site plan must illustrate all of the following (when applicable):
  - Lot lines, lot/parcel numbers, acreage/square footage of lots, and contiguous properties under the same ownership;
  - All existing and proposed structures, fences, roads, driveways, parking areas, and easements, each with identifying labels and dimensions;
  - Setbacks of all structures from lot lines and easements;
  - Significant natural features (rivers, streams, wetlands, slopes of 20% or greater, geologic hazards, mature trees or forested areas, drainage areas, etc.); and
  - Location of utilities, wells, and all onsite wastewater treatment facilities (e.g., septic tanks, septic drainfield areas, replacement drainfield areas, drywells).
- ☒ **Service Feasibility Determinations:** Request that the property's water provider, sanitary sewer provider, and surface water management authority, as applicable, each complete a [Preliminary Statement of Feasibility](#) and include those completed statements with your application. If the proposed development will be served by an onsite wastewater treatment system (e.g., a septic system), include an approved Site Evaluation or Authorization Notice from the [Septic & Onsite Wastewater Program](#) attesting to the feasibility of your proposal.
- ☒ **Transportation impact study:** Refer to the information provided at the pre-application conference regarding the need for a transportation impact study. Include a copy of any required study with your application submittal.
- ☒ **Any additional information or documents advised of during the pre-application conference**

**D. Answer the following questions:**

1. What Comprehensive Plan designation are you requesting for the subject property?

Requested Plan designation: High Density Residential

2. What zoning district designation are you requesting for the subject property?

Requested zoning district: HDR

3. If the zoning designation you requested in response to Question 2 cannot be approved because the property doesn't meet the approval criteria, would you like an alternate zoning district designation to be considered?

☒ NO

☐ YES, and the alternate zoning district designation(s) I would like is/are:

\_\_\_\_\_

4. Are you filing this Comprehensive Plan Map amendment and zone change application with another application (e.g., an application for a partition or subdivision)?

☒ NO, this application is being filed alone.

☐ YES, this application is being filed with another application. That other application requests the following:

\_\_\_\_\_

## D. Respond in a narrative:

Your application submittal must include a narrative that fully responds to the following. Due to the technical nature of these requirements, guidance on how best to respond will be provided during the required pre-application conference.

1. How is your proposal consistent with applicable Statewide Planning Goals?
2. How is your proposal consistent with the applicable goals and policies of the County's [Comprehensive Plan](#)?
3. If relevant, how is your proposal consistent with Metro's Urban Growth Management Functional Plan?
4. If development under the proposed zone would need public services (sanitary sewer, surface water management, and water), could the need be accommodated with the implementation of the applicable service provider's existing capital improvement plan? The cumulative impact of the proposed zone change and development of other properties under existing zoning designations must be considered.
5. Explain how the transportation system is adequate and will remain adequate with approval of the proposed zone change. This explanation should take into consideration the following:
  - a. "Adequate" means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, *Motor Vehicle Capacity Evaluation Standards for the Urban Area*, and 5-2b, *Motor Vehicle Capacity Evaluation Standards for the Rural Area*.
  - b. Conduct the evaluation of transportation system adequacy pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).
  - c. Assume that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.
  - d. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.
  - e. The adequacy standards apply to all roadways and intersections within the impact area of the proposed zone change. The impact area is identified based on the Clackamas County Roadway Standards.
  - f. A determination of whether submittal of a transportation impact study is required is made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.
  - g. (d) through (f) above do not apply to roadways and intersections under the jurisdiction of the State of Oregon. Instead, motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the

ODOT Transportation Analysis Procedures Manual for such roadways and intersections.

6. Explain how the safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.

## FAQs

### What is a Comprehensive Plan Map amendment and zone change?

All land in the County has been divided into mapped Comprehensive Plan designations, each of which corresponds to one or more zoning districts. A Comprehensive Plan Map amendment and zone change results in a property switching from one Comprehensive Plan Map designation and zoning district to another designation and zoning district, which may change allowed uses, minimum lot size, and other development standards.

### What is the permit application process?

Comprehensive Plan Map amendments and zone changes that are *not* related to the Historic Landmark, Historic District, and Historic Corridor overlay district are subject to a "Type III" land use application process, as provided for in [Section 1307](#) of the ZDO. Type III decisions include notice to owners of nearby land, the Community Planning Organization (if active), service providers (sewer, water, fire, etc.), and affected government agencies, and are reviewed at public hearings before the Planning Commission and the Board of County Commissioners (BCC). If the application is approved, the applicant must comply with any conditions of approval identified in the decision. The County's decision can be appealed to the Oregon Land Use Board of Appeals (LUBA).

### What is needed for the County to approve a land use permit?

Comprehensive Plan Map amendments and zone changes *may* be permitted after an evaluation of applicable standards by staff, the Planning Commission, and the BCC. The applicant is responsible for providing evidence that their proposal does or can meet those standards. In order to address the standards, the information requested in this application should be as thorough and complete as possible. A permit will only be approved or denied after a complete application is received and reviewed. The BCC approves an application only if it finds that the proposal meets the standards or can meet the standards with conditions.

### How long will it take the County to make a decision about an application?

A final decision on an application for a Comprehensive Plan Map amendment and zone change is generally issued within 24 weeks (168 days) of when we deem the application to be complete. However, these applications are often highly complex and may take longer to process.

### If an application is submitted and then withdrawn, will a refund be given?

The fee for this application includes a \$3,830 fee for review by the Hearings Officer, which will be fully refunded if the application is withdrawn before the hearing occurs. If the submitted Type III application is withdrawn before it is publicly noticed, 75% of the portion of the application fee paid that is not the Hearings Officer review fee (i.e., the remainder), or the remainder minus \$250, whichever is less, will be refunded. If a submitted application is withdrawn after it is publicly noticed, but before a staff report is issued, 50% of the remainder, or \$500, whichever is less, will be refunded. No refund on the remainder will be given after a staff report is issued.

### Who can help answer additional questions?

For questions about the County's land use permit requirements and this application form, contact Planning and Zoning at **503-742-4500** or [zoninginfo@clackamas.us](mailto:zoninginfo@clackamas.us). You can also find information online at the Planning and Zoning website: [www.clackamas.us/planning](http://www.clackamas.us/planning).

*Clackamas County is committed to providing meaningful access and will make reasonable accommodations, modifications, or provide translation, interpretation or other services upon request. Please contact us at 503-742-4545 or [drenhard@clackamas.us](mailto:drenhard@clackamas.us).*

**503-742-4545:** ¿Traducción e interpretación? | Требуется ли вам устный или письменный перевод?

翻译或口译? | Cần Biên dịch hoặc Phiên dịch? | 번역 또는 통역?

***Rose Villa Senior Living Comp Plan/Rezone***  
**Land Use Application Narrative**

Type III Review – Comprehensive Plan Map Amendment and Zone Change

---

**Property Owner:** RoseVilla Senior Living (Attn: Jim Willeford)  
13505 SE River Road  
Portland, OR 97222  
JWilleford@rosevilla.org  
(971) 707-8510

**Applicant:** Thuy Cao, AICP  
Harper Houf Peterson Righellis, Inc.  
205 SE Spokane Street, Suite 200  
Portland, OR 97202  
thuyc@hhpr.com  
(503) 221-1131 ext. 154

**Site Address:** 1802 SE Torbank Road and 13614 SE River Road

**Tax Lots:** Tax Map 21E02DA Tax Lot 3400 and 3500

**Site Size:** 1.19 acres

**Zoning:** R-10

**Summary of Request:** Proposal to rezone two properties adjacent to the existing Rose Villa Senior Living campus from R-10 to HDR for future redevelopment.

**Date:** June 16, 2025



## TABLE OF CONTENTS

---

|             |                                                            |           |
|-------------|------------------------------------------------------------|-----------|
| <b>I.</b>   | <b>BACKGROUND</b>                                          | <b>4</b>  |
|             | <i>SUMMARY</i>                                             | 4         |
|             | <i>PLANNING CONTEXT</i>                                    | 4         |
| <b>II.</b>  | <b>RESPONSE TO APPROVAL CRITERIA</b>                       | <b>5</b>  |
|             | <i>STATEWIDE PLANNING GOALS</i>                            | 5         |
|             | Goal 1. Citizen Involvement                                | 5         |
|             | Goal 2. Land Use Planning                                  | 5         |
|             | Goal 10. Housing                                           | 5         |
|             | Goal 11. Public Facilities and Services                    | 6         |
|             | Goal 12. Transportation                                    | 6         |
|             | <i>OREGON REVISED STATUTES (ORSs)</i>                      | 6         |
|             | <i>OREGON ADMINISTRATIVE RULES (OARs)</i>                  | 7         |
|             | <i>METRO URBAN GROWTH MANAGEMENT FUNCTION PLAN (UGMFP)</i> | 7         |
|             | Title 1: Housing Capacity                                  | 7         |
|             | Title 12: Protection of Residential Neighborhoods          | 7         |
|             | <i>COMPREHENSIVE PLAN (COMP PLAN)</i>                      | 8         |
|             | CHAPTER 2 – CITIZEN INVOLVEMENT                            | 8         |
|             | CHAPTER 3 – NATURAL RESOURCES AND HAZARDS                  | 8         |
|             | CHAPTER 4 – LAND USE                                       | 9         |
|             | CHAPTER 5 – TRANSPORTATION SYSTEM PLAN                     | 10        |
|             | CHAPTER 6 -- HOUSING                                       | 10        |
|             | CHAPTER 7 – PUBLIC FACILITIES AND SERVICES                 | 11        |
|             | CHAPTER 8 – ECONOMIC DEVELOPMENT                           | 11        |
|             | <i>ZONING AND DEVELOPMENT ORDINANCE (ZDO)</i>              | 12        |
|             | ZDO SECTION 1202 (ZONE CHANGES)                            | 12        |
|             | 1202.03 General Approval Criteria                          | 12        |
| <b>III.</b> | <b>APPLICATION SUBMITTAL NARRATIVE RESPONSES</b>           | <b>15</b> |
| <b>IV.</b>  | <b>CONCLUSION</b>                                          | <b>18</b> |



## ATTACHMENTS

1. Land Use Application
2. Site Plan
3. Tax Map
4. Preliminary Statement of Feasibility
5. Transportation Impact Study



## **I. BACKGROUND**

---

### **SUMMARY**

The owners are requesting a comprehensive map amendment and zone change for two properties adjacent to the existing Rose Villa Senior Living campus from Low Density Residential (R-10) to High Density Residential (HDR). The project site is approximately 1.19 acres in size and consists of two properties located at 1802 SE Torbank Road and 13614 SE River Road (Tax lots 3400 and 3500).

### **PLANNING CONTEXT**

The project site is located at 1802 SE Torbank Road and 13614 SE River Road in unincorporated Clackamas County, directly adjacent to the existing Rose Villa Senior Living campus. The two properties—Tax Lots 3400 and 3500—total approximately 1.19 acres and are currently zoned R-10 (Low Density Residential), with a corresponding Comprehensive Plan designation of Low Density Residential. The site is bound to the west by SE River Road, a minor arterial roadway, and to the north by SE Torbank Road, classified as a local street. The existing built context includes the Rose Villa campus to the west, and additional single-family lots surrounding the two properties. The properties are currently developed with residential structures and accessory buildings.

The applicants are seeking a Comprehensive Plan Map Amendment and Zone Change to re-designate the properties from Low Density Residential to High Density Residential (HDR). This change is intended to facilitate the future expansion of the Rose Villa Senior Living community and accommodate additional senior-oriented housing. The subject site meets multiple policy criteria outlined in the Clackamas County Comprehensive Plan for HDR designation, including proximity to a minor arterial (SE River Road), adjacency to an established employment and services center (Rose Villa), and the absence of mapped natural hazards. The zone change proposal is also supported by a comparative trip generation analysis demonstrating that the projected increase in vehicle trips falls below the threshold considered a significant effect under the Oregon Highway Plan and Transportation Planning Rule (OAR 660-012-0060).

#### **Vicinity Map**



## **II. RESPONSE TO APPROVAL CRITERIA**

---

### **STATEWIDE PLANNING GOALS**

#### **Goal 1. Citizen Involvement**

*Local governments must provide opportunities for meaningful public involvement in land use planning, including notice, access to information, and the ability to participate in public hearings.*

**Response:** This proposal is being processed as a Type III land use application by Clackamas County and is therefore subject to public notice and hearings before the Planning Commission and Board of County Commissioners. The applicants have already participated in a pre-application conference and will respond to public and agency comments throughout the process. This ensures compliance with Goal 1 by providing multiple opportunities for public input.

#### **Goal 2. Land Use Planning**

*Land use decisions must be based on coordinated planning and an adequate factual base. Comprehensive Plan amendments and zone changes must be justified with supporting evidence and coordination with affected agencies.*

**Response:** The proposed zone change and Comprehensive Plan amendment are supported by a coordinated and fact-based land use application. This includes utility feasibility statements, a Transportation Planning Rule (TPR) analysis, and compliance findings with the County's Comprehensive Plan and Metro Functional Plan. Service providers and County staff have been engaged through the pre-application process, ensuring inter-agency coordination. Therefore, the application satisfies the procedural and substantive requirements of Goal 2.

#### **Goal 10. Housing**

*This goal requires local jurisdictions to provide for an adequate number of housing units and to encourage the efficient use of buildable land within urban growth boundaries. OAR 660-007 and 660-008 define the standards for determining compliance with Goal 10.*

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from Low Density Residential (R-10) to High Density Residential (HDR) directly supports Goal 10 by enabling a greater number of housing units on a site that is already served by urban services and located within the Metro Urban Growth Boundary. The subject site is 1.19 acres and could accommodate approximately 29 units under the proposed HDR zoning, compared to a maximum of 6 units under the existing R-10 zoning. This represents a more efficient use of land that aligns with the intent of Goal 10 to maximize housing production within designated urban areas.

Furthermore, the proposed HDR designation is consistent with local and regional efforts to expand housing choice, density, and affordability, particularly for seniors. As an extension of the Rose Villa Senior Living campus, the project will likely offer housing types specifically designed for the aging population, contributing to a balanced and inclusive housing supply that meets the needs of diverse household types and income levels. The proposal does not reduce housing capacity and instead supports Clackamas



County's obligation under Goal 10 to ensure adequate buildable land for housing development across the full range of needed housing types.

**Goal 11. Public Facilities and Services**

*Development must be served by adequate public facilities and services (e.g., sewer, water, storm drainage), and those services must be planned and coordinated in an efficient, cost-effective manner.*

**Response:** A Preliminary Statement of Feasibility from the Oak Lodge Water Services District (OLWSD) confirms that sanitary sewer, potable water, and surface water management systems have capacity to serve the proposed HDR development. The site is within an existing service area and no extraordinary improvements are required. The project complies with Goal 11 by demonstrating the availability and efficiency of public facilities consistent with adopted service provider plans.

**Goal 12. Transportation**

*The applicant will be required to submit a traffic study or similar evidence to demonstrate compliance with requirements of the Transportation Planning Rule (TPR), found in Oregon Administrative Rules 660-012-0060, as well as the requirements of ZDO Section 1202.03 and Chapter 5 of the Comprehensive Plan.*

**Response:** The applicant has prepared a Transportation Planning Rule (TPR) analysis evaluating the potential impact of the proposed zone change from Low Density Residential (R-10) to High Density Residential (HDR) on the surrounding transportation network. The analysis compares a reasonable worst-case development scenario under both zoning designations and concludes that the proposed HDR zoning would generate a net increase of 152 weekday trips, which falls below the 400-trip threshold used by the Oregon Highway Plan to define a “significant effect.” The report also includes a crash history review for the SE River Road and SE Torbank Road intersection and surrounding segment. Only three crashes were reported over a five-year period, none of which indicate a pattern of safety concerns. Based on this data, the report finds that the proposed zone change will not degrade transportation performance or safety and that no mitigation is required. Therefore, the application complies with Goal 12, the Transportation Planning Rule, ZDO Section 1202.03(C) and (D), and relevant policies in Chapter 5 of the Clackamas County Comprehensive Plan. The existing transportation infrastructure is adequate to support the modest increase in traffic associated with the proposed residential density.

(Goals 3–9 and Goals 13–19 are not applicable to this proposal as the site is within the UGB, not designated for agricultural, forest, or natural resource protection, and does not involve coastal, recreational, or energy planning.)

## OREGON REVISED STATUTES (ORSs)

**Response:** This application is consistent with the relevant provisions of ORS Chapter 197 (Comprehensive Land Use Planning Coordination), including:

- ORS 197.175(2)(a), which requires local governments to carry out their duties under the Statewide Planning Goals through comprehensive plans and implementing regulations.



- The proposed map amendment and zone change are supported by findings that demonstrate consistency with both the Statewide Goals and the County's acknowledged Comprehensive Plan and Development Ordinance.

## **OREGON ADMINISTRATIVE RULES (OARs)**

**Response:** The application complies with the following from the OARs:

- OAR 660-012-0060 (Transportation Planning Rule). A formal TPR analysis was completed and demonstrates that the proposed zone change will not significantly affect the transportation system as defined under the rule. The projected net increase in daily trips falls well below the 400-trip threshold that would require mitigation, and all studied intersections continue to meet performance standards. The County, Metro, and ODOT policies are fully addressed in the accompanying analysis.
- OAR 660-007 and 660-008 (related to Goal 10 implementation). These rules guide housing planning and coordination within the Portland Metropolitan Urban Growth Boundary. The proposed HDR designation increases residential capacity on underutilized land and supports the provision of age-friendly and special needs housing, consistent with these administrative rules.

## **METRO URBAN GROWTH MANAGEMENT FUNCTION PLAN (UGMFP)**

### **Title 1: Housing Capacity**

*To ensure local jurisdictions maintain or increase housing capacity sufficient to accommodate projected regional population growth and housing needs.*

**Response:** The proposed zone change from R-10 to HDR on the 1.19-acre subject site is consistent with Title 1 because it increases overall residential capacity within the existing Urban Growth Boundary (UGB). The current R-10 zoning permits only approximately four to five housing units across both parcels. The HDR designation will allow development of approximately 29 senior-oriented units, significantly expanding capacity in a way that addresses the housing needs of an aging population.

The site is adjacent to the Rose Villa Senior Living campus, a long-established community serving a broad spectrum of senior residents. This proposal supports Metro's Title 1 goal by creating opportunities for infill development in a location with existing infrastructure and services. The proposed units will not displace existing households and are located on parcels already developed with low-intensity, aging residential structures. Therefore, the proposed amendment not only maintains but enhances the region's ability to meet future housing demand, particularly for age-friendly and accessible housing.

### **Title 12: Protection of Residential Neighborhoods**

*To protect the livability and stability of existing residential neighborhoods, with special attention to preventing displacement, increasing equitable access to housing, and preserving neighborhood character.*



**Response:** The proposed HDR designation supports the objectives of Title 12 by providing new senior housing options without displacing existing households. The two subject properties are directly adjacent to Rose Villa and are currently underutilized, containing one single-family home and accessory structures. The proposed development will introduce compatible residential uses designed for aging residents and integrated into the existing senior community.

The zone change does not compromise the character or livability of the surrounding area. The project site fronts SE River Road, a minor arterial capable of supporting moderate increases in traffic, and avoids burdening local residential streets. Senior housing is a low-impact use, with trip generation rates and noise levels lower than typical market-rate multifamily developments. In addition, the expanded housing options for older adults within an established senior community directly align with Metro's goals for equitable and inclusive neighborhoods. The proposed amendment also enhances neighborhood stability by providing long-term housing options for aging residents who may otherwise need to relocate outside the community. By supporting aging in place and co-location of services, this proposal contributes to a more resilient, inclusive residential neighborhood.

## **COMPREHENSIVE PLAN (COMP PLAN)**

### **CHAPTER 2 – CITIZEN INVOLVEMENT**

#### **Policy 2.A.1**

*Require provisions for opportunities for citizen participation in preparing and revising local land use plans and ordinances. Insure opportunities for broad representations, not only of property owners and Countywide special interests, but also of those persons within the neighborhood or areas in question.*

**Finding:** The applicant has met citizen involvement requirements by engaging in the County's public land use process, including participation in a pre-application conference and preparation of a Type III application that will be subject to public notice and hearing procedures. Nearby residents and Community Planning Organizations (CPOs) will be notified and given the opportunity to comment on the proposed zone change, consistent with Clackamas County's citizen involvement policies.

### **CHAPTER 3 – NATURAL RESOURCES AND HAZARDS**

#### **Policy 3.A.1**

*Maintain rivers and streams in their natural state to the maximum practicable extent through sound water and land management practices. Consideration shall be given to natural, scenic, historic, economic, cultural, and recreational qualities of the rivers and adjacent lands.*

#### **Policy 3.A.3**

*Apply erosion and sediment reduction practices in all river basins to assist in maintaining water quality. Existing riparian vegetation along streams and river banks should be retained to provide fisheries and wildlife habitat, minimize erosion and scouring, retard water velocities, and suppress water temperatures.*

**Finding:** There are no mapped water quality resource areas or protected natural features on the subject site. The proposed rezone does not conflict with policies intended to protect riparian buffers, water quality, or significant natural resources



## **CHAPTER 4 – LAND USE**

### **Policy 4.U.1**

*The following areas may be designated High Density Residential when at least the first three criteria are met:*

*4.U.1.1 – Areas located either adjacent to or within proximity to major shopping centers, employment concentrations, and/or major transit centers.*

*4.U.1.2 – Areas with access to a street designated as a major or minor arterial or collector. Siting should not result in significant traffic increase on local streets serving low density residential areas.*

*4.U.1.3 – Areas free from known geologic hazards, flooding, or soils subject to slippage.*

*4.U.1.4 – Areas adjacent to permanently protected open space or bodies of water as long as the above criteria are applicable.*

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from Low Density Residential (R-10) to High Density Residential (HDR) for two properties located at 1802 SE Torbank Road and 13614 SE River Road (Tax Lots 3400 and 3500) is consistent with Clackamas County Comprehensive Plan Chapter 4, Policy 4.U.1. This policy permits HDR designations where at least the first three criteria are met:

#### *4.U.1.1 – Proximity to Employment Concentrations or Major Transit Centers*

The subject site is directly adjacent to the Rose Villa Senior Living campus, an established and expanding senior residential and care facility that functions as a local employment center. Rose Villa offers a wide range of jobs in healthcare, administration, and operations, making it a suitable anchor for increased residential density. The site is also within walking distance of transit service along SE River Road, with connections to commercial and employment centers in Milwaukie and along the McLoughlin Boulevard corridor.

#### *4.U.1.2 – Access to a Major or Minor Arterial or Collector*

The site has direct access to SE River Road, which is classified as a minor arterial. While SE Torbank Road, located along the northern edge of the site, is a local street, the project does not propose new access from SE Torbank. Access and circulation are expected to rely on SE River Road, thereby avoiding additional traffic burden on local residential streets. A Transportation Planning Rule (TPR) compliance analysis was prepared for this proposal and confirms that the zone change would result in a projected increase of only 152 daily trips—well below the 400-trip threshold used by the Oregon Highway Plan to define a “significant effect.” Therefore, the proposed designation is not expected to create significant traffic impacts on surrounding local streets.

#### *4.U.1.3 – Free from Known Hazards or Constraints*

The site is not located within a mapped floodplain or wetland and is not subject to known geologic hazards or soils prone to slippage, as confirmed by the Oregon State Wetland Inventory and DOGAMI hazard mapping. The site is considered free from natural development constraints and suitable for higher density residential development.

#### *4.U.1.4 – Adjacent to Permanently Protected Open Space or Water Bodies*



While not adjacent to protected open space or water bodies, this criterion is not mandatory. The proposal meets the first three criteria and is therefore eligible for High Density Residential designation under Policy 4.U.1.

The proposed amendment is consistent with Policy 4.U.1 of the Comprehensive Plan, which allows HDR designations in areas that are well-served by transportation infrastructure, proximate to employment and services, and free from natural hazards. The zone change supports the County's broader housing and land use goals by facilitating a logical extension of the Rose Villa Senior Living campus.

## **CHAPTER 5 – TRANSPORTATION SYSTEM PLAN**

### **Policy 5.F.6**

*Require changes in land use plan designation and zoning designation to comply with the Transportation Planning Rule "TPR" (Oregon Administrative Rules (OAR) 660- 012-0060).*

**Response:** A Transportation Planning Rule (TPR) compliance analysis has been prepared for this application to evaluate the potential impacts of the proposed zone change on the surrounding transportation system. The analysis compares the reasonable worst-case development scenario under the current R-10 zoning (6 residential units) with that of the proposed High Density Residential (HDR) zoning (29 residential units). The study estimates that full build-out under the HDR designation would generate a net increase of approximately 152 weekday trips, including 9 AM peak hour and 12 PM peak hour trips. This increase falls well below the 400 daily trip threshold identified in the Oregon Highway Plan (OHP) as constituting a "small increase" in traffic that does not trigger a significant effect under the TPR. Additionally, the proposed zone change will not alter the functional classification of any transportation facilities, degrade performance below adopted mobility targets, or create inconsistencies with existing transportation system plans.

Based on this analysis, the proposed amendment complies with the Transportation Planning Rule and satisfies Policy 5.F.6. No mitigation is required or recommended, and the existing transportation infrastructure is considered sufficient to accommodate the proposed zone change.

## **CHAPTER 6 -- HOUSING**

### **Policy 6.A.1**

*Encourage development that will provide a range of choices in housing type, design, and price and rent level throughout the urban areas of the County.*

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from Low Density Residential (R-10) to High Density Residential (HDR) directly supports this policy by enabling a more efficient use of a 1.19-acre site adjacent to existing infrastructure and services. The HDR designation allows for increased residential density, which can support a wider variety of housing formats and affordability levels—including independent or assisted senior housing, apartments, or other attached housing types. These forms of development are not feasible under the current R-10 zoning. This proposal also advances housing choice for older adults and individuals with fixed or moderate incomes, in alignment with the ongoing evolution of the Rose Villa Senior Living campus. By facilitating additional housing units in a location



already served by transit and services, the amendment helps meet County goals for equitable and diverse housing opportunities in an urban context.

**Policy 6.A.7**

*Encourage a wide range of housing alternatives for the elderly or handicapped.*

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from Low Density Residential (R-10) to High Density Residential (HDR) directly supports this policy by enabling the expansion of the Rose Villa Senior Living campus. Rose Villa is an established residential and care community for older adults, offering a continuum of housing and supportive services that accommodate a wide range of physical, cognitive, and lifestyle needs. Rezoning the adjacent properties will allow for the creation of additional age-friendly housing options, including independent living, assisted living, and accessible residential units—housing types that are critical to addressing the evolving needs of Clackamas County’s aging population. The proposal promotes inclusive, senior-oriented development in a walkable, transit-accessible location, and contributes to a diverse and adaptable housing stock for vulnerable populations. Therefore, the proposed amendment is consistent with and advances the objectives of Policy 6.A.7 by encouraging intentional and context-sensitive expansion of housing alternatives for elderly and disabled residents.

**CHAPTER 7 – PUBLIC FACILITIES AND SERVICES**

**Policy 7.A.1**

*Recognize County responsibility for operating, planning and regulating wastewater systems as designated in the approved Sewerage Facilities Master Plan.*

**Policy 7.A.2**

*Recognize that Clackamas County Service District No. 1, Tri-City Service District, Oak Lodge Sanitary District, the Unified Sewerage Agency and the City of Portland have responsibility for operating, planning, and regulating wastewater systems as designated in the approved Sewerage Facilities Master Plan.*

**Finding:** The subject site is located within the service area of Oak Lodge Water Services District (OLWSD), the entity responsible for the planning, regulation, and operation of wastewater services for this portion of unincorporated Clackamas County. This structure is recognized in the County’s Sewerage Facilities Master Plan, which designates specific service providers for defined geographies within the Urban Growth Boundary. A Preliminary Statement of Feasibility from OLWSD confirms that sufficient wastewater capacity exists to support development under the proposed High Density Residential (HDR) zoning. As such, the proposed zone change is consistent with Policies 7.A.1 and 7.A.2, ensuring wastewater needs will be met through a coordinated and approved service structure.

**CHAPTER 8 – ECONOMIC DEVELOPMENT**

**Policy 8.A.3**

*Facilitate the efficient operation of existing firms in the urban area by giving high priority to equality in public services including law enforcement, water service and fire protection, storm drainage, sewer, transit, pedestrian and bike access, road maintenance, and traffic access and circulation.*



**Finding:** The Rose Villa campus is a well-established institution and employer in the Oak Grove area. The proposed zone change will facilitate campus expansion and operational efficiency by co-locating new senior housing adjacent to existing facilities. The site is fully served by sewer, water, and transportation infrastructure, aligning with the intent of Policy 8.A.3.

## **ZONING AND DEVELOPMENT ORDINANCE (ZDO)**

### **ZDO SECTION 1202 (ZONE CHANGES)**

#### **1202.03 General Approval Criteria**

*A zone change requires review as a Type III or IV application pursuant to Section 1307, Procedures, and shall be subject to the following standards and criteria:*

- A. The proposed zone change is consistent with the applicable goals and policies of the Comprehensive Plan.*

**Response:** The proposed zone change from Low Density Residential (R-10) to High Density Residential (HDR) is consistent with the applicable goals and policies of the Clackamas County Comprehensive Plan, as required under ZDO Section 1202.03(A). The proposed amendment supports Chapter 4, Policy 4.U.1, which establishes criteria for areas eligible for HDR designation. The subject site meets the required criteria by being adjacent to an employment concentration (Rose Villa Senior Living campus), having direct access to a minor arterial (SE River Road), and being free from mapped environmental hazards such as floodplains or unstable soils.

The proposal also aligns with Chapter 5, Policy 5.F.6, and satisfies the Transportation Planning Rule (OAR 660-012-0060), as demonstrated by a submitted traffic analysis showing a projected net increase of only 152 daily vehicle trips—well below the threshold for a significant effect.

Additionally, the proposal supports housing goals in Chapter 6, including Policy 6.A.1, which encourages a diverse range of housing types and densities, and Policy 6.A.7, which promotes housing alternatives for the elderly and persons with disabilities. The proposed HDR zoning will facilitate senior-oriented housing options as part of Rose Villa’s expansion, helping meet community needs for accessible and age-friendly housing.

Finally, the proposed amendment is consistent with Statewide Planning Goals 10 (Housing) and 12 (Transportation), both of which are mirrored in the Comprehensive Plan and are further supported by the project’s location, density potential, and minimal transportation impact. Therefore, the proposed zone change is consistent with the County’s Comprehensive Plan as required by ZDO Section 1202.03(A).

- B. If development under the proposed zoning district designation has a need for any of the following public services, the need can be accommodated with the implementation of the applicable service provider’s existing capital improvement plan: sanitary sewer, surface water management, and water. The cumulative impact of the proposed zone change and development of other properties under existing zoning designations shall be considered.*



**Response:** The subject properties are located within the service boundaries of Oak Lodge Water Services District (OLWSD), which provides sanitary sewer, water, and surface water management services. A completed Preliminary Statement of Feasibility has been submitted with this application to demonstrate the availability of these services for future development under the proposed High Density Residential (HDR) zoning. The Statement confirms that:

- Adequate sanitary sewer capacity is available in both the treatment system and collection infrastructure to serve the proposed development.
- Water service, including fire flows, is available or can be made available through developer-initiated improvements, if necessary.
- Surface water management, treatment, and conveyance can also be provided to serve the site.

There are no conditions of approval or service limitations noted by the provider, indicating that the zone change will not require upgrades outside of what is anticipated in the District's existing Capital Improvement Plan (CIP). Furthermore, the proposed increase in density—up to 29 units—is relatively modest and located within a fully urbanized service area, minimizing the risk of cumulative impacts to system capacity. Accordingly, the proposed zone change meets the public service adequacy requirements outlined in ZDO Section 1202.03(B).

*C. The transportation system is adequate and will remain adequate with approval of the proposed zone change. For the purpose of this criterion:*

- 1. Adequate means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, Motor Vehicle Capacity Evaluation Standards for the Urban Area, and 5-2b, Motor Vehicle Capacity Evaluation Standards for the Rural Area.*
- 2. The evaluation of transportation system adequacy shall be conducted pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012- 0060).*
- 3. It shall be assumed that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.*
- 4. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.*
- 5. The adequacy standards shall apply to all roadways and intersections within the impact area of the proposed zone change. The impact area shall be identified pursuant to the Clackamas County Roadway Standards.*
- 6. A determination regarding whether submittal of a transportation impact study is required shall be made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.*
- 7. Notwithstanding Subsections 1202.03(C)(4) through (6), motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODOT Transportation Analysis Procedures Manual for roadways and intersections under the jurisdiction of the State of Oregon.*



**Response:** The proposed zone change complies with ZDO Section 1202.03(C). This criterion requires a demonstration that the transportation system is and will remain adequate following the zone change, as defined by the volume-to-capacity (v/c) ratio and level of service (LOS) standards adopted in the Clackamas County Comprehensive Plan and implemented through the Transportation Planning Rule (OAR 660-012-0060). A Transportation Planning Rule (TPR) compliance analysis was prepared by a qualified transportation engineer and submitted with this application. The analysis evaluated a reasonable worst-case development scenario, assuming the site is developed with the highest trip-generating land use permitted outright under HDR zoning. The study compared anticipated trip generation under both the existing R-10 zoning (6 single-family units) and the proposed HDR zoning (29 multifamily units).

The results indicate that the proposed HDR zoning would generate a net increase of approximately 152 weekday vehicle trips, including 9 AM peak hour and 12 PM peak hour trips. This increase is well within the 400 daily trip threshold set by the Oregon Highway Plan (OHP) and OAR 660-012-0060 for determining a “significant effect” on transportation facilities. As such, the project qualifies as generating a “small increase” in traffic, and no degradation of v/c ratios or LOS is anticipated. Crash history was also evaluated for the nearby intersection at SE River Road and SE Torbank Road. Only three crashes were recorded within a 1,000-foot segment over a five-year period, with no systemic safety concerns identified. This further supports the conclusion that the transportation system is capable of safely accommodating the proposed zone change.

No mitigation measures or capacity improvements are required. Therefore, the transportation system is adequate and will remain adequate, consistent with the criteria and procedures outlined in ZDO 1202.03(C), the Clackamas County Roadway Standards, and the ODOT Transportation Analysis Procedures Manual for state facilities.

*D. Safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.*

**Response:** The proposed zone change meets the requirements of ZDO Section 1202.03(D), which requires that the safety of the transportation system is adequate to serve the level of development allowed under the proposed zoning. A Transportation Planning Rule (TPR) compliance memo, prepared by a licensed transportation engineer, included a crash history review for the segment of SE River Road near the site as well as the intersection at SE River Road and SE Torbank Road. The analysis covered the most recent five-year period (2019–2023) using data from the Oregon Department of Transportation’s Crash Data System. Three crashes were reported within the study area:

- One pedestrian-involved crash (Injury B), caused by a fatigued driver.
- One fixed-object crash (property damage only).
- One improper backing crash at the SE River Rd/SE Torbank Rd intersection (property damage only).

These isolated incidents do not indicate a pattern of concern or systemic safety deficiency. There were no fatal crashes, and no crash clusters or repeat conflict types were identified. The crash frequency and types are consistent with what would be expected on similar minor arterial corridors with mixed residential and institutional uses. The TPR analysis concludes that the projected net increase of 152 daily vehicle trips associated with the proposed HDR zoning constitutes a small increase in traffic, per Oregon Highway Plan thresholds, and does not degrade safety. Therefore, the transportation system is considered safe and adequate to accommodate the anticipated level of development, and the proposal meets the requirements of ZDO Section 1202.03(D).



### **III. APPLICATION SUBMITTAL NARRATIVE RESPONSES**

---

1. How is your proposal consistent with applicable Statewide Planning Goals?

**Response:** The proposed Comprehensive Plan Map Amendment and Zone Change from R-10 to HDR is consistent with applicable Statewide Planning Goals. It aligns with Goal 1 (Citizen Involvement) by utilizing Clackamas County's public land use process, including a Type III review with public notice and hearings. It complies with Goal 2 (Land Use Planning) through a fact-based application supported by coordinated service provider input and transportation analysis. Most critically, it advances Goal 10 (Housing) by increasing housing capacity within the UGB and supporting senior housing. The proposal meets Goal 11 (Public Facilities and Services) by providing documentation from OLWSD confirming adequate utility capacity, and Goal 12 (Transportation) by submitting a Transportation Planning Rule (TPR) analysis showing no significant impact to system performance or safety.

2. How is your proposal consistent with the applicable goals and policies of the County's Comprehensive Plan?

**Response:** This proposal supports multiple goals and policies in Clackamas County's Comprehensive Plan. In Chapter 4, it meets Policy 4.U.1 by proposing HDR near employment and services, with access to a minor arterial and no natural hazard constraints. It supports Chapter 6 housing policies by enabling senior-focused development that diversifies housing choices and increases density on underutilized land. Public facilities policies in Chapter 7 are addressed through OLWSD's feasibility confirmation, and transportation policies in Chapter 5 are satisfied through a TPR-compliant analysis. The proposal also aligns with Chapter 2's citizen involvement requirements by following the County's public review process. Collectively, these findings demonstrate consistency with the Comprehensive Plan.

3. If relevant, how is your proposal consistent with Metro's Urban Growth Management Function Plan?

**Response:** The proposal complies with Metro's Urban Growth Management Functional Plan Titles 1 and 12. Under Title 1, it increases housing capacity within the UGB, from a maximum of 6 units to approximately 29, aligning with Metro's regional housing targets without displacing existing households. The HDR designation supports infill development near services, transit, and employment. Under Title 12, the proposal protects neighborhood character by locating low-impact senior housing next to the Rose Villa campus and minimizing new traffic on local streets. It expands housing options for seniors in a way that promotes stability and equitable access, consistent with Metro's livability goals.

4. If development under the proposed zone would need public services (sanitary sewer, surface water management, and water), could the need be accommodated with the implementation of the applicable service provider's existing capital improvement plan? The cumulative impact of the proposed zone change and development of other properties under existing zoning designations must be considered.

**Response:** Yes, proposal is supported by a Preliminary Statement of Feasibility from the Oak Lodge Water Services District (OLWSD), which confirms that sanitary sewer, stormwater, and potable water services are available to support HDR development on the 1.19-acre site. The proposed 29 units represent a modest increase in demand and do not require infrastructure upgrades beyond what is anticipated in OLWSD's



Capital Improvement Plan. The site is within a fully urbanized service area, and there are no cumulative impacts expected from this or other nearby developments that would compromise utility service delivery.

5. Explain how the transportation system is adequate and will remain adequate with approval of the proposed zone change. This explanation should take into consideration the following:
- a. “Adequate” means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, *Motor Vehicle Capacity Evaluation Standards for the Urban Area*, and 5-2b, *Motor Vehicle Capacity Evaluation Standards for the Rural Area*.
  - b. Conduct the evaluation of transportation system adequacy pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).
  - c. Assume that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.
  - d. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.
  - e. The adequacy standards apply to all roadways and intersections within the impact area of the proposed zone change. The impact area is identified based on the Clackamas County Roadway Standards.
  - f. A determination of whether submittal of the transportation impact study is required is made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.
  - g. (d) through (f) above do not apply to roadways and intersections under the jurisdiction of the State of Oregon. Instead, motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODOT Transportation Analysis Procedures Manual for such roadways and intersections.

**Response:** The proposed zone change from Low Density Residential (R-10) to High Density Residential (HDR) has been evaluated for transportation system adequacy pursuant to the Transportation Planning Rule (TPR), OAR 660-012-0060, and the standards set forth in Clackamas County’s Comprehensive Plan Tables 5-2a (Urban Area Motor Vehicle Capacity Evaluation Standards) and County Roadway Standards.

A Transportation Planning Rule Memo prepared by a licensed traffic engineer evaluates the impact of the proposed zoning under a reasonable worst-case development scenario—29 senior housing units, based on the highest trip-generating allowed residential use under HDR zoning. The trip generation analysis follows Institute of Transportation Engineers (ITE) Trip Generation Manual standards and assumes maximum development potential, as required. The TPR memo concludes that the proposed zone change would result in a net increase of 152 average daily trips and 10 weekday PM peak hour trips, which is well below the 400 daily trip threshold considered a “significant effect” under OAR 660-012-0060(2). Therefore, the proposal does not require mitigation or trigger improvements to the transportation system. All roadways and intersections within the impact area—identified pursuant to Clackamas County Roadway Standards and the ODOT Transportation Analysis Procedures Manual for River Road (a minor arterial under ODOT jurisdiction)—are projected to operate within acceptable volume-to-capacity (v/c) ratios and Level of Service (LOS) thresholds. Because the net increase in trips is minor and the affected facilities will continue to meet adopted performance measures, the transportation system is considered adequate and will remain adequate following approval of the proposed zone change, consistent with ZDO Section 1202.03(C) and applicable state and local transportation planning rules.



6. Explain how the safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.

**Response:** The safety of the transportation system is adequate to support the level of development anticipated under the proposed zone change from Low Density Residential (R-10) to High Density Residential (HDR). The Transportation Planning Rule (TPR) Memo prepared by a licensed traffic engineer includes a review of crash data provided by ODOT's Crash Analysis and Reporting Unit for SE River Road, the primary access route to the site. The analysis did not identify any systemic safety concerns, such as high crash frequencies or collision patterns, at intersections or segments within the project's impact area. Access to the site is proposed via SE Torbank Road, a local street intersecting with SE River Road, which is a minor arterial. The proposed senior-oriented residential use is expected to generate lower vehicle speeds and volumes than typical multifamily developments, thereby contributing minimally to potential conflicts at access points. The intersection of SE Torbank Road and SE River Road provides adequate sight distance and turning movement capacity, and no safety mitigation measures were identified as necessary.

Overall, the transportation system provides safe vehicular and pedestrian access to and from the site and will continue to operate safely under the proposed HDR zoning. This satisfies ZDO Section 1202.03(D) by demonstrating that the existing system is sufficient to serve the expected development without compromising safety for all travel modes.



## IV. CONCLUSION

---

This summary of request and attachments demonstrates compliance with applicable approval criteria. The applicant respectfully requests that the County approve this application.





## Instructions for PRELIMINARY STATEMENTS OF FEASIBILITY

### Instructions to Applicant:

The attached *Preliminary Statement of Feasibility* form is to be completed by the applicable sanitary sewer service provider, surface water management authority, and water service provider. Where there is no surface water management service district for the subject property, this form is to be provided to the Clackamas County Department of Transportation and Development, Transportation Engineering Division. *Preliminary Statements of Feasibility* are not required for onsite wastewater treatment facilities (e.g., septic tanks) or water service by private well.

Completed *Preliminary Statement of Feasibility* forms must be submitted with a land use application for design review, a partition, a subdivision, conditional use permit, or zone change.

It is the responsibility of the applicant for a land use application to provide a copy of this form to each service provider for the subject property. A service provider may require the submission of detailed plans and/or engineering data prior to determining whether a *Preliminary Statement of Feasibility* will be issued. Contact the service providers for details.

The forms must be dated no more than one year prior to submittal of a complete land use application.

### Instructions to Reviewing Service Provider or Surface Water Management Authority:

A development is proposed within your service area. Please complete the attached *Preliminary Statement of Feasibility* to indicate whether adequate service can be provided to this development.

If adequate service can be provided only with the implementation of certain conditions of approval, you may attach such conditions to the completed form. Completion of the *Preliminary Statement of Feasibility* does not imply that additional requirements (e.g., plan submittals) may not be imposed by your agency once a land use application for the prospective development is filed.

Clackamas County Planning & Zoning will continue to provide notice to you of land use applications for property within your service area. This will allow you to determine whether the submitted development proposal differs from the plans reviewed by your agency in conjunction with the completion of this statement. This will also allow you to provide additional comments as necessary.

*Clackamas County is committed to providing meaningful access and will make reasonable accommodations, modifications, or provide translation, interpretation or other services upon request. Please contact us at 503-742-4545 or [drenhard@clackamas.us](mailto:drenhard@clackamas.us).*

**503-742-4545:** ¿Traducción e interpretación? | Требуется ли вам устный или письменный перевод?  
翻译或口译? | Cần Biên dịch hoặc Phiên dịch? | 번역 또는 통역?



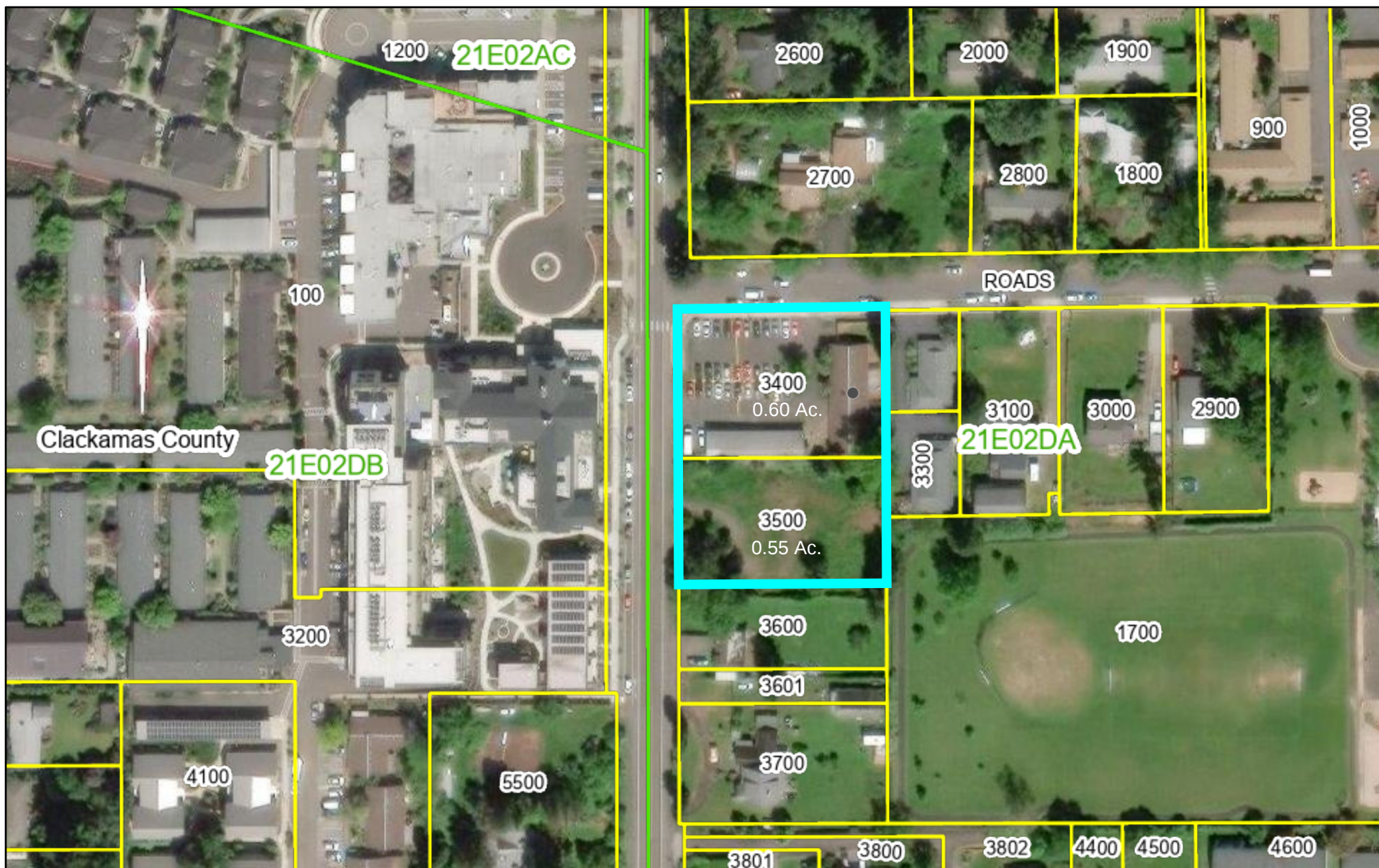
## PRELIMINARY STATEMENT OF FEASIBILITY

| TO BE COMPLETED BY APPLICANT                               |                         |                         |
|------------------------------------------------------------|-------------------------|-------------------------|
| Applicant name:                                            | Applicant email:        | Applicant phone:        |
| Project engineer:                                          | Project engineer email: | Project engineer phone: |
| Site address:                                              |                         |                         |
| Map and tax lot #:                                         |                         |                         |
| Township: _____ Range: _____ Section: _____ Tax Lot: _____ |                         |                         |
| Township: _____ Range: _____ Section: _____ Tax Lot: _____ |                         |                         |
| Township: _____ Range: _____ Section: _____ Tax Lot: _____ |                         |                         |

| TO BE COMPLETED BY SERVICE PROVIDER / SURFACE WATER MANAGEMENT AUTHORITY                                                                                                                                                                                                                                                                                                   |                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Name of service provider / surface water management authority:                                                                                                                                                                                                                                                                                                             | Name and title of authorized representative: |
| Representative email:                                                                                                                                                                                                                                                                                                                                                      | Representative phone:                        |
| Check all that apply:                                                                                                                                                                                                                                                                                                                                                      |                                              |
| <b>Water Service</b>                                                                                                                                                                                                                                                                                                                                                       |                                              |
| <input type="checkbox"/> Water service, <i>including fire flows</i> , is available in levels appropriate for the development and adequate water system capacity is available in source, supply, treatment, transmission, storage, and distribution, or such levels and capacity can be made available through improvements completed by the developer or the system owner. |                                              |
| <input type="checkbox"/> Water service is adequate <i>with the exception of fire flows</i> . The applicant shall provide a statement from the fire district serving the subject property that states that an alternate method of fire protection, such as an on-site water source or sprinkler system, is acceptable.                                                      |                                              |
| <input type="checkbox"/> Adequate water service <i>cannot</i> be provided.                                                                                                                                                                                                                                                                                                 |                                              |
| <b>Sanitary Sewer Service</b>                                                                                                                                                                                                                                                                                                                                              |                                              |
| <input type="checkbox"/> Sanitary sewer capacity in the wastewater treatment system and the sanitary sewage collection system is available to serve the development or can be made available through improvements completed by the developer or the system owner.                                                                                                          |                                              |
| <input type="checkbox"/> Adequate sanitary sewer service <i>cannot</i> be provided.                                                                                                                                                                                                                                                                                        |                                              |
| <b>Surface Water Management, Treatment, and Conveyance</b>                                                                                                                                                                                                                                                                                                                 |                                              |
| <input type="checkbox"/> Adequate surface water management, treatment, and conveyance is available to serve the development or can be made available through improvements completed by the developer or the system owner.                                                                                                                                                  |                                              |
| <input type="checkbox"/> Adequate surface water management, treatment, and conveyance <i>cannot</i> be provided.                                                                                                                                                                                                                                                           |                                              |
| Is this statement issued subject to any conditions of approval?                                                                                                                                                                                                                                                                                                            |                                              |
| <input type="checkbox"/> YES, and those conditions are attached.                                                                                                                                                                                                                                                                                                           |                                              |
| <input type="checkbox"/> NO                                                                                                                                                                                                                                                                                                                                                |                                              |
| Signature of authorized representative: <i>Jennifer Backhaus</i>                                                                                                                                                                                                                                                                                                           | Date of signature: <i>6/5/2025</i>           |

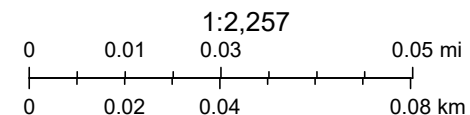
Conditions For Statement of Feasibility 1802 SE Torbank Rd and 13614 SE River Rd

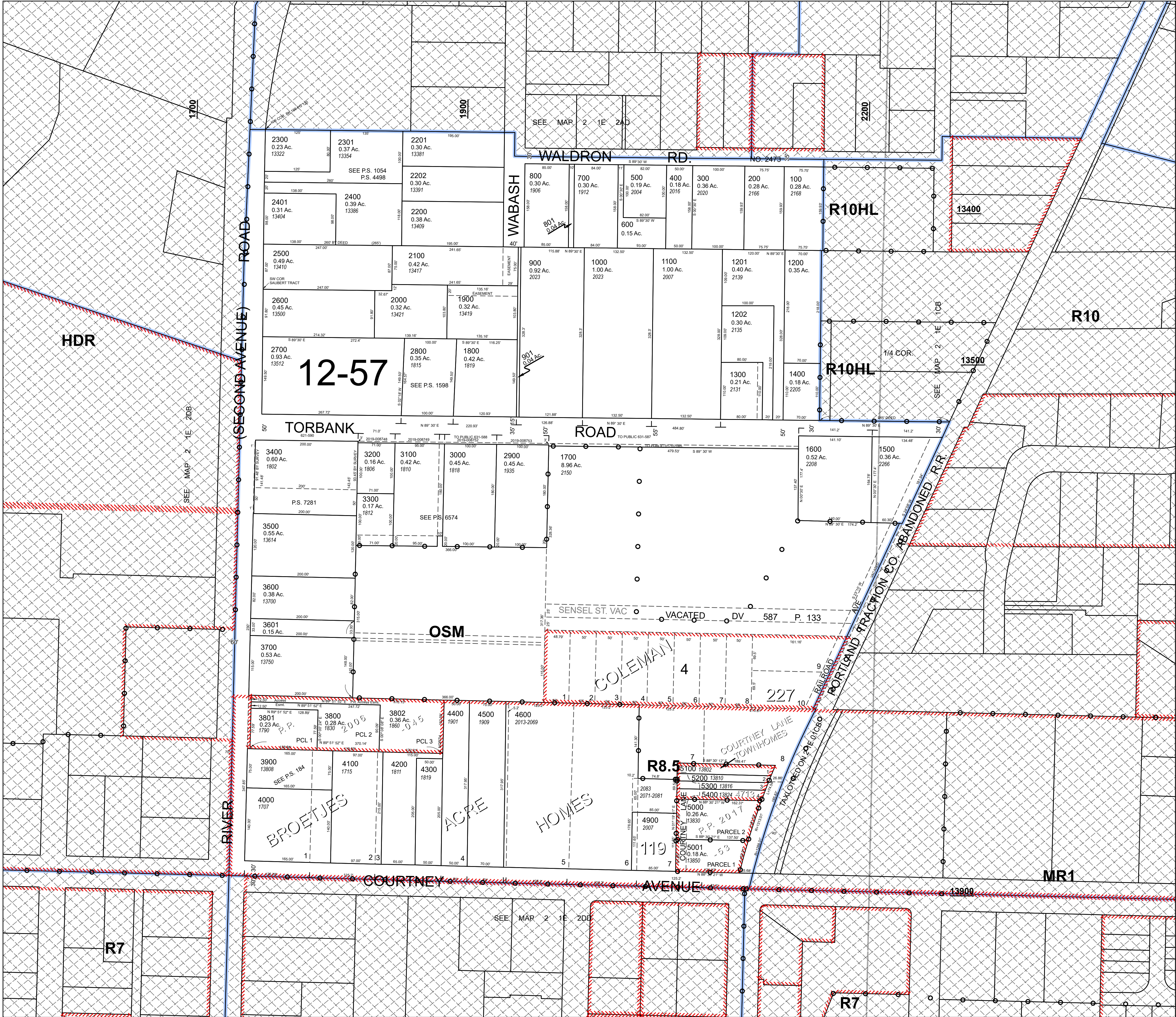
1. The property owner is responsible for managing stormwater runoff for all new impervious surface area. Stormwater management facilities will be reviewed and approved under an Oak Lodge permit following Land Use application approval. These facilities must be designed and constructed in accordance with Oak Lodge Water Services Design and Construction Standards
  - a. For new impervious surface area between 1,000 and 10,000 square feet, a completed Simplified Approach and Simplified Storm Facility Sizing form is required. These forms include a sizing chart for standardized methods of managing stormwater based on soil type infiltration rate, and total impervious surface area. A site plan showing where/how the stormwater will be managed is also required.
  - b. For new impervious surface area in excess of 10,000 square feet, a preliminary stormwater report is required. The report must also include a site plan showing where/how the stormwater will be managed.
2. Oak Lodge Water Services does not own the stormwater conveyance system and cannot authorize connections to that system. The owner of the system reconciles existing capacity to proposed impacts with Clackamas County DTD and may include downstream analysis.



# Legend

- taxlot
- project site
- mapIndex





2 1E 02DA

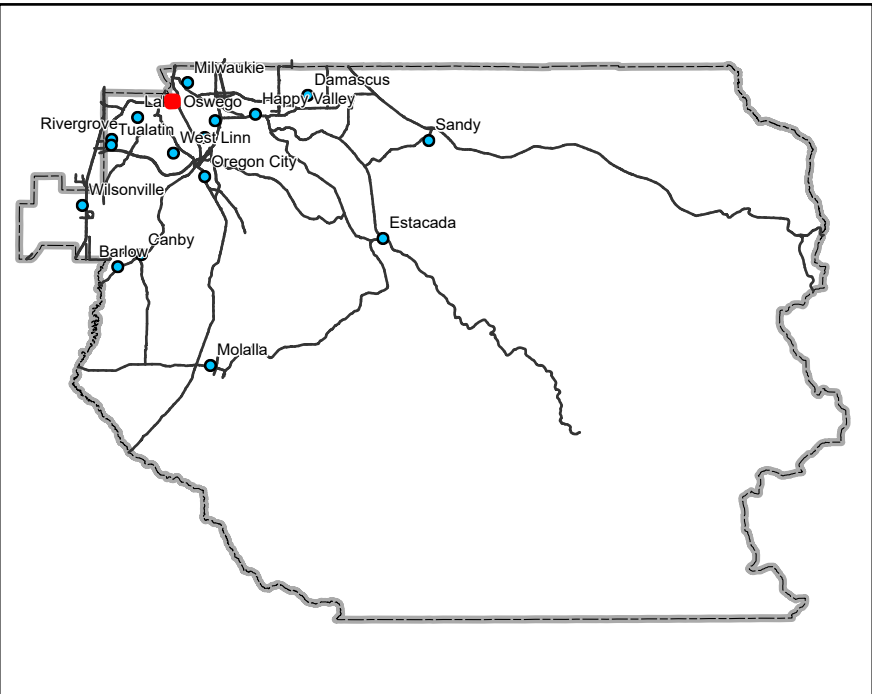
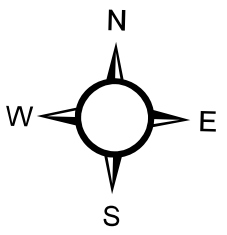
N.E. 1/4 S.E. 1/4 SEC.02 T.2S. R.1E. W. M.  
CLACKAMAS COUNTY

1" = 100'

D.L.C.  
GEORGE CROW NO. 49

Cancelled

4700  
4800  
4901  
5002



THIS MAP IS FOR ASSESSMENT  
PURPOSES ONLY

2 1E 02DA

Print Date: 10/12/2023

## Memorandum

To: Clackamas County Staff  
Oregon Department of Transportation Staff

From: Ken Kim, PE

Date: June 11, 2025

Subject: Rose Villa Zone Change  
Transportation Planning Rule Analysis



EXPIRES: 06/30/2025

## Introduction

This memorandum discusses transportation considerations around the proposed zone change and potential redevelopment of 21E02DA03400 and 21E02DA03500 located at 1802 SE Torbank Road and 13614 SE River Road in Milwaukie, Oregon. Specifically, the proposed project will rezone the properties from *Low Density Residential (R-10)* to *High Density Residential (HDR)*.

Figure 1 shows an aerial view of the nearby vicinity, with the project site outlined in yellow, the two proposed parcels for rezoning are located southeast corner of SE Torbank Road at SE River Road.

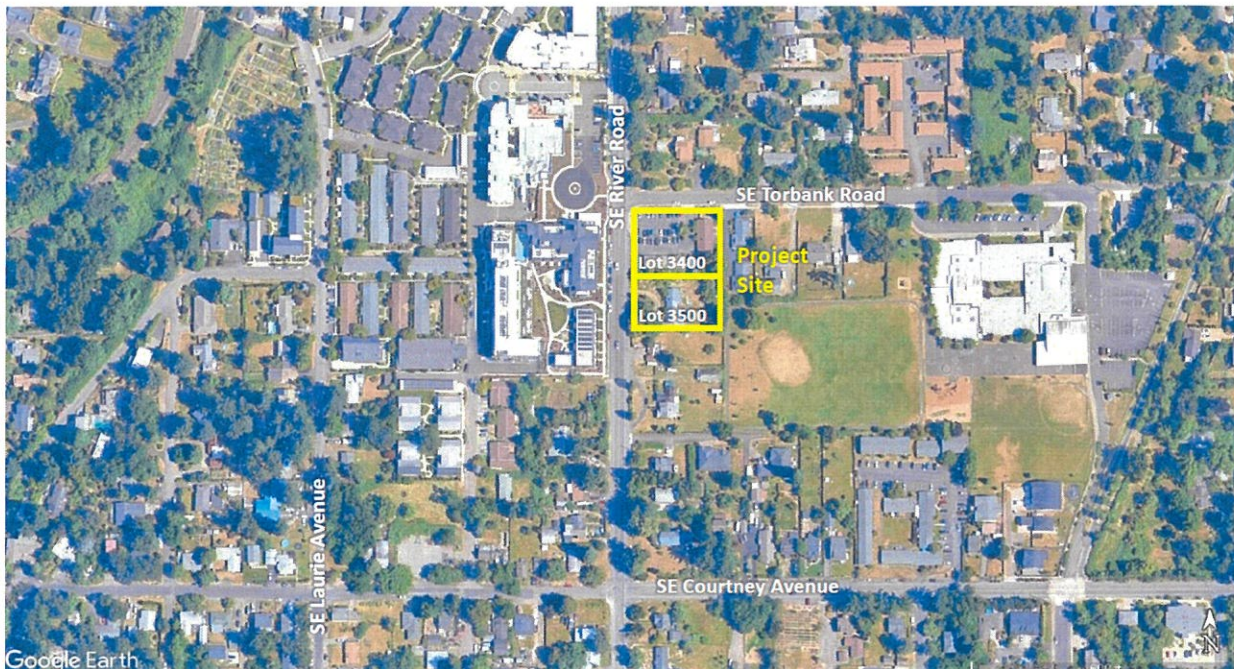


Figure 1: Vicinity Map (image from Google Earth)

## Comparative Trip Generation Analysis

Because the proposed land use action involves a change in zoning, it is necessary to address the TPR<sup>1</sup>, which is in place to ensure that the transportation system can support possible increases in traffic intensity that could result from changes to adopted plans and land-use regulations. It requires an analysis of a reasonable worst-case development scenario of the site under existing and proposed zoning. The assumptions and potential development scenarios are described below.

### Existing Zoning

To determine the maximum development potential of the property under its existing zoning, the base density (BD) must be calculated from the property's gross site area (GSA). The subject properties are located on tax lot 21E02DA03400 and 21E02DA03500 and has a GSA of approximately 1.19 acres, all zoned as R-10.

Per Section 1012.05.B(1)(b) of the Clackamas County Zoning and Development Ordinance, no reductions to the GSA due to new county, public, or private roads (NR) are necessary. Therefore, the property's net site area (NSA) is equal to its GSA.

The general density (GD) of the property is calculated by dividing its NSA by the district land area (DLA). The DLA within the R-10 zone is equivalent to the minimum lot size. The County establishes a minimum lot size of 8,000 square feet for properties within the R-10<sup>2</sup>. Given an NSA of approximately 1.19 acres (51,836 square feet), the general density of the property is 6 units. Therefore, the reasonable maximum buildout development scenario for the site under R-10 zoning is 6 units.

### Proposed Zoning

The subject property is proposed to be rezoned to from R-10 zoning to HDR zoning. Using the same methodology for calculating the base density of the existing zoning and using the DLA of 1,742 square feet under HDR zoning<sup>3</sup>, the maximum buildout development scenario for the site under the proposed HDR zoning is 29 units.

### Trip Generation

To estimate the trips generated by the reasonable full build-out development scenario of the property under existing and proposed zoning, trip rates from the *Trip Generation Manual*<sup>4</sup> were used. Specifically, data from land use code 215, *Single Family Attached Housing*, and land use code 220, *Multifamily Housing (Low-Rise)* were used based on the number of units within the existing R-10 zoning as opposed to the proposed HDR zoning.

The trip generation calculations show that the proposed zone change is projected to generate a net increase of 9 morning peak hour, 12 evening peak hour, and 152 daily trips. Table 1 below summarizes the trip generation of both zoning scenarios. Detailed trip generation calculations are included in the appendix to this memorandum.

---

<sup>1</sup> Oregon Administrative Rule (OAR) Section 660, Division 12, also known as the Transportation Planning Rule (TPR) requires consistency between land use and transportation system plans. Specifically, OAR 660-012-0060 requires that if "an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility," then measures must be put in place to remedy the impacts.

<sup>2</sup> Table 315-2, Clackamas County Zoning and Development Ordinance Section 315. 9/9/24.

<sup>3</sup> Table 315-4, Clackamas County Zoning and Development Ordinance Section 315. 9/9/24.

<sup>4</sup> Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 11<sup>th</sup> Edition. 2021



**Table 1: Trip Generation Summary**

| Scenario        | ITE Code | Size     | Morning Peak Hour |      |       | Evening Peak Hour |      |       | Weekday Total |
|-----------------|----------|----------|-------------------|------|-------|-------------------|------|-------|---------------|
|                 |          |          | Enter             | Exit | Total | Enter             | Exit | Total |               |
| Existing Zoning | 215      | 6 units  | 1                 | 2    | 3     | 2                 | 1    | 3     | 44            |
| Proposed Zoning | 220      | 29 units | 3                 | 9    | 12    | 9                 | 6    | 15    | 196           |
| Net Difference  |          |          | 2                 | 7    | 9     | 7                 | 5    | 12    | 152           |

## Crash History Review

Using data obtained from ODOT's Crash Data System, a review of approximately five years of the most recent available crash history (January 2019 through December 2023) was performed at the intersection of SE River Road & SE Torbank Road, in addition to the roadway segment of SE River Road and SE Torbank Road. The crash data was evaluated based on the number of crashes, the type of collisions, and the severity of the collisions. Crash severity is based on injuries sustained by people involved in the crash, and includes five categories:

- *PDO* – Property Damage Only
- *Injury C* – Possible Injury
- *Injury B* – Suspected Minor Injury
- *Injury A* – Suspected Serious Injury
- *Fatality*

Table 2 provides a summary of crash types and crash severities.

**Table 2: Segment Collision Summary**

| Crash Location                                         | Crash Type       | Crash Severity |
|--------------------------------------------------------|------------------|----------------|
| 260 feet north of SE Torbank Road along SE River Road  | Fixed Object     | PDO            |
| At the intersection of SE River Road & SE Torbank Road | Improper Backing | PDO            |
| 115 feet south of SE Torbank Road along SE River Road  | Pedestrian       | Injury B       |
| Total Crashes = 3                                      |                  |                |

Three (3) crashes were reported along the 1,000-foot segment of SE River Road near the project site during the five-year analysis period. One of the crashes was a fixed object crash, one was caused by an improper backing, and one was a pedestrian-related crash. No other crashes were reported along SE Torbank Road.

A pedestrian-related crash occurred when the driver of a northbound vehicle was fatigued/sleepy and struck a pedestrian working in roadway or along shoulder. The pedestrian sustained injuries classified as Injury B while the driver of the striking vehicle sustained no injuries. The collision occurred under cloudy, dry, and daytime (12:00 pm, 04/25/2022) conditions.



At the intersection of SE River Road and SE Torbank Road, one crash was reported and classified as a PDO. A improper backing vehicle struck a vehicle waiting on SE Torbank Road to make a turn into SE River Road. The collision occurred under clear, dry, and daytime (1:00 pm, 07/16/2019) conditions.

The last crash near Main Street was a fixed-object collision with the cause reported as inattention. The crash classified as a PDO. The collision occurred under rainy, wet, and nighttime (3:00 am, 11/23/2021) conditions.

Based on the most recent five years of available crash data, three (3) crashes were reported along the 1,000-foot segment of SE River Road near the project site. Three crashes are not excessive or indicative of a safety problem. Eventual redevelopment of the properties under the proposed zone could result in increased pedestrian crossings on River Road. At the time this redevelopment is proposed, the safety of the current marked crossing on River Road at Torbank Road should be evaluated.

## Transportation Planning Rule Compliance

Zone changes in the State of Oregon must adhere to the Transportation Planning Rule (TPR), which aims to ensure that the transportation system can support possible increases in traffic intensity that could result from changes to adopted plans and land use regulations. The applicable section of the TPR is quoted directly in italics below, with a response directly following.

### **660-012-0060**

- (1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:*
- (a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);*
  - (b) Change standards implementing a functional classification system; or*
  - (c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.*
    - (A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;*
    - (B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or*
    - (C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.*



Subsections (a) and (b) will not be triggered because the proposed zone change will not alter the functional classification of any existing or planned facility and the proposal does not include a change to any functional classification standards.

Regarding subsection (c), the proposed zone change is estimated to generate an additional 9 morning peak hour, 12 evening peak hour trips, and 152 weekday trips compared with the existing zoning. The Oregon Department of Transportation (ODOT) defines a threshold at which a project would “significantly affect” a transportation facility. This threshold is detailed in the Oregon Highway Plan (OHP) Action 1F.5, with the relevant sections quoted below:

*If an amendment subject to OAR 660-012-0060 increases the volume to capacity ratio further, or degrades the performance of a facility so that it does not meet an adopted mobility target at the planning horizon, it will significantly affect the facility unless it falls within the thresholds listed below for a small increase in traffic.*

...

*The threshold for a small increase in traffic between the existing plan and the proposed amendment is defined in terms of the increase in total average daily trip volumes as follows:*

- *Any proposed amendment that does not increase the average daily trips by more than 400.*

As described in the *Trip Generation* section, the projected daily net increase in the traffic intensity of the site, which could potentially occur due to the proposed zone change, will be 152 weekday trips. This daily trip generation is within the 400-trip impact threshold that is considered a “small increase” in traffic; therefore, the zone change will not cause further degradation of the nearby transportation facilities.

## Clackamas County Approval Criteria

Section 1202.03 of the Clackamas County Zoning and Development Ordinance lists the general approval criteria for zone changes. Subsections 1202.03(C) and 1202.03(D) require the surrounding transportation system is adequate and will remain adequate to support the proposed zone change in regards to the system’s operability and safety.

As discussed in the *Trip Generation* section, the proposed zone change is projected to generate a net increase of 9 morning peak hour, 12 evening peak hour, and 152 daily trips. These projections come from the highest motor vehicle trip generation rate of the proposed zone change. Per the OHP, this level of trip generation may be considered a “small increase” in traffic that will not cause further degradation of the nearby transportation facilities. Based on the most recent five years of available crash data, three (3) crashes were reported along the 1,000-foot segment of SE River Road near the project site. Three crashes are not excessive or indicative of a safety problem. Therefore, the proposed zone change is expected to have a minimal impact on the operability and safety of the surrounding transportation system.

## Conclusion

Based on an analysis of the nearby transportation system, the existing transportation infrastructure is sufficient to accommodate impacts associated with the proposed zone change and potential redevelopment of the project site. The small amount of traffic projected to be generated by the proposed use is not expected to



significantly affect the design or functionality of the local streets within the site vicinity. Accordingly, the Transportation Planning Rule and Clackamas County general approval criteria are satisfied and no mitigation is necessary or recommended.



## Appendix





TRIP GENERATION CALCULATIONS  
Source: Trip Generation Manual, 11th Edition

*Land Use:* Multifamily Housing (Low-Rise)  
*Land Use Code:* 220  
*Land Use Subcategory:* Not Close to Rail Transit  
*Setting/Location:* General Urban/Suburban  
*Variable:* Dwelling Units  
*Trip Type:* Vehicle  
*Formula Type:* Rate  
*Variable Quantity:* 29

**AM PEAK HOUR**

*Trip Rate:* 0.4

|                   | Enter | Exit | Total |
|-------------------|-------|------|-------|
| Directional Split | 24%   | 76%  |       |
| Trip Ends         | 3     | 9    | 12    |

**PM PEAK HOUR**

*Trip Rate:* 0.51

|                   | Enter | Exit | Total |
|-------------------|-------|------|-------|
| Directional Split | 63%   | 37%  |       |
| Trip Ends         | 9     | 6    | 15    |

**WEEKDAY**

*Trip Rate:* 6.74

|                   | Enter | Exit | Total |
|-------------------|-------|------|-------|
| Directional Split | 50%   | 50%  |       |
| Trip Ends         | 98    | 98   | 196   |

Source: Trip Generation Manual, 11th Edition



TRIP GENERATION CALCULATIONS  
Source: Trip Generation Manual, 11th Edition

*Land Use:* Single-Family Attached Housing  
*Land Use Code:* 215  
*Land Use Subcategory:* All Sites  
*Setting/Location:* General Urban/Suburban  
*Variable:* Dwelling Units  
*Trip Type:* Vehicle  
*Formula Type:* Rate  
*Variable Quantity:* 6

WARNING: Variable Quantity is less than Minimum Survey Size for Peak Hours

**AM PEAK HOUR**

*Trip Rate:* 0.48

|                   | Enter | Exit | Total |
|-------------------|-------|------|-------|
| Directional Split | 25%   | 75%  |       |
| Trip Ends         | 1     | 2    | 3     |

**PM PEAK HOUR**

*Trip Rate:* 0.57

|                   | Enter | Exit | Total |
|-------------------|-------|------|-------|
| Directional Split | 59%   | 41%  |       |
| Trip Ends         | 2     | 1    | 3     |

**WEEKDAY**

*Trip Rate:* 7.2

|                   | Enter | Exit | Total |
|-------------------|-------|------|-------|
| Directional Split | 50%   | 50%  |       |
| Trip Ends         | 22    | 22   | 44    |

**SATURDAY**

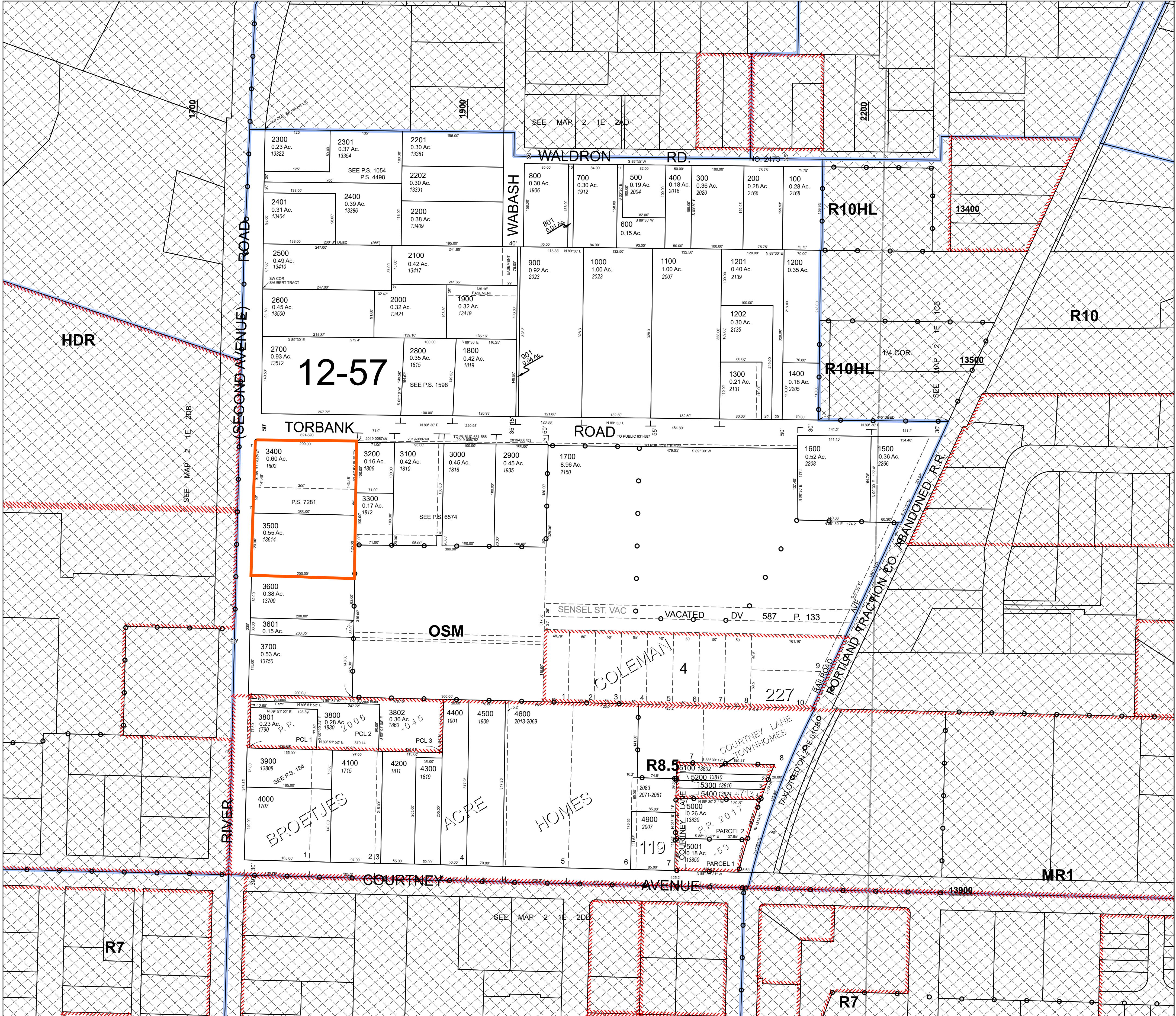
*Trip Rate:* 8.76

|                   | Enter | Exit | Total |
|-------------------|-------|------|-------|
| Directional Split | 50%   | 50%  |       |
| Trip Ends         | 26    | 26   | 52    |

Source: Trip Generation Manual, 11th Edition







2 1E 02DA

N.E. 1/4 S.E. 1/4 SEC.02 T.2S. R.1E. W. M.

CLACKAMAS COUNTY

1" = 100'

D.L.C.

GEORGE CROW NO. 49

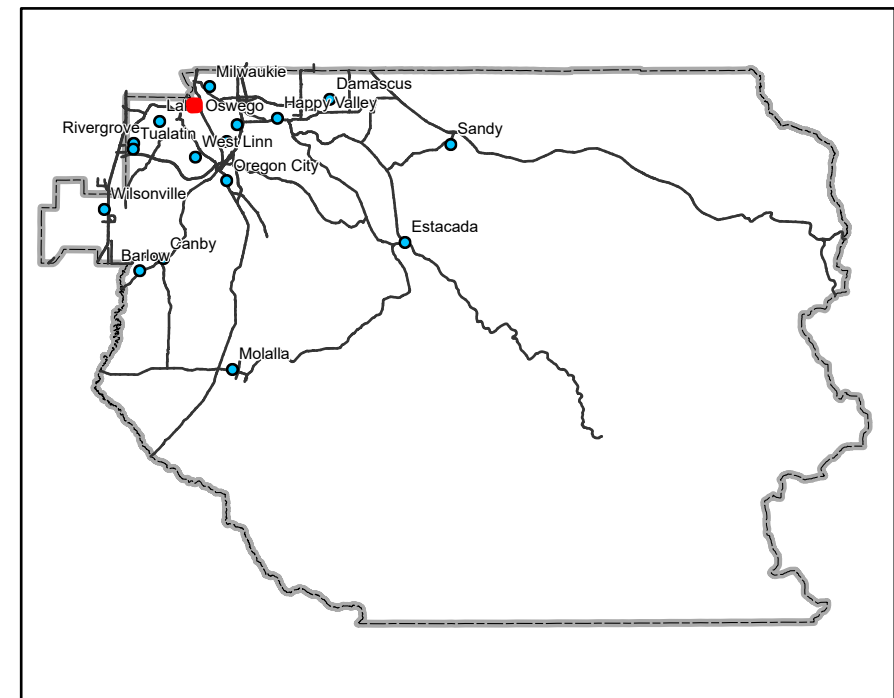
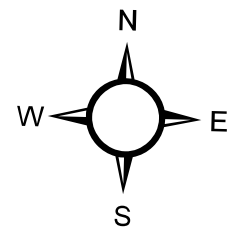
Cancelled

4700

4800

4901

5002



THIS MAP IS FOR ASSESSMENT  
PURPOSES ONLY

Print Date: 10/12/2023

2 1E 02DA



**Douglas McClain**  
Director

**PLANNING DIVISION**

**DEVELOPMENT SERVICES BUILDING**

150 BEAVERCREEK ROAD | OREGON CITY, OR 97045

**DECISION**  
**DESIGN REVIEW**

**CLACKAMAS COUNTY DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT  
LAND USE AND ENVIRONMENTAL PLANNING DIVISION**

150 Beaver Creek Road, Oregon City, Oregon 97045

Phone: 503-742-4528

TO: Area land owners, Design Review Committee, Applicant, Citizens Planning Organization and Agencies.

DATE: June 15, 2009

DECISION: **APPROVAL, with conditions.**

**APPEAL DATE: June 29, 2009**

FILE NO.: Z0148-09-D(Master Plan); Rose Villa

STAFF CONTACT: Linda Preisz

APPLICANT: Vassar Byrd, Myhre Group Architects

OWNER OF PROPERTY: Rose Villa Inc.

LEGAL DESCRIPTION: T2S, R1E, Section 02AC, Tax Lot(s) 100, 200, 900, 1200, 1300 and Section 02DB, Tax Lot(s) 1500, 1600, 3200

SITE ADDRESS: 13505 SE River Road

TOTAL AREA INVOLVED: Approximately 21 acres

PRESENT ZONING: HDR, High Density Residential.

CITIZENS PLANNING ORGANIZATION FOR AREA: Oak Lodge CPO, Charlie Stephens; 14115 Fair Oaks Avenue, Oak Grove OR 97267, 503-786-6138, cstephens@spiritone.com.

PROPOSAL: Approval of a framework plan, a master plan, to rebuild and create a pedestrian-oriented, active campus for seniors. The construction phasing strategy balances immediate campus needs, minimal impact to the current residents and neighbors, and shovel ready land. Five phases are planned to span the next seven to ten years once construction begins. Phase One is sited on a vacant parcel that currently serves as the community garden. Minimal impacts occur in this phase as it displaces no current residents and requires no building demolition. Construction includes two-story independent living apartment complexes with river views, new community greens, and detached garages. Phase Two (located along River Road) will include a new mixed-use building housing a Wellness Center, exercise  
FILE NO. Z0148-09-D(Master Plan); Rose Villa

facility, swimming pool as well as independent living apartments and a green courtyard. A comprehensive utilities plan update will begin here where sewer, water supply and electricity lines tie into the campus. Proposed Phase Three will provide for the construction of North Drive and provide continuous vehicle circulation from River Road through the campus to SE Laurie Avenue. A new curb cut along River Road will provide access to the southern portion of the campus via the South Drive. This portion of South Drive will connect with SE Schroeder Avenue. Phase Four will extend the construction of South Drive through to SE Laurie Avenue and alignment with SE Denny Street. Phase Five will provide the continuation of the Rose Pedestrian Promenade across the campus towards the south. Through the northern portion of the development, open space will allow for a potential future access drive connection with Willamette View. Included in this Master Plan is the ceasing of operation on the east side of River Road. In the mean time the east property is proposed to be used temporarily as a building construction staging area during development.

**BACKGROUND:** The property is located on the east side of SE River Road, between the Willamette View residential development and SE Courtney Avenue. The Rose Villa Retirement Community currently occupies the 21 acre site. The property is zoned High Density Residential (HDR). Congregate and multi-family uses are allowed within the HDR district with design review. Previous land use approval has allowed the establishment of the existing medical facility. Uses within the immediate vicinity include high density residential and single family residential development.

**FINDINGS:** This application is subject to Clackamas County Zoning and Development Ordinance (ZDO) Section(s) 303, 1001, 1005, 1006, 1007, 1008, 1009, 1010, 1021, and 1102. The Clackamas County Design Review staff has reviewed these Ordinance Sections with respect to this proposal and makes the following findings and conclusions:

1. The applicant is requesting Design Review approval for new construction and redevelopment on property as described above. The applicant has submitted plot plan information, building detail, area information, grading plan, landscape plan, building colors, etc. to satisfy minimal submittal requirements identified in Section 1102 of the ZDO. Several pre-application conferences have been held last year. Topics discussed at that time included the following: building siting and design standards, parking requirements, density issues, access issues, etc...
2. Section 303 of the ZDO outlines allowed uses, as well as, dimensional and development standards within the High Density Residential Zoning District. As proposed, staff finds that *this criterion is satisfied*.
3. Section 1001 of the ZDO discusses general standards for development of property and associated facilities within the unincorporated area of Clackamas County. The standards therein apply to partitions, subdivisions, commercial and industrial projects, multifamily and common wall structures of three (3) or more dwellings. Section 1001 requires application of other standards as noted in Section 1000. Discussion of the various provisions of Sec. 1000 is found in the following findings.
4. Pursuant to subsec. 1001.02A of the ZDO, the standards of Sec. 1000 are applicable to Design Review applications. Pursuant to subsec. 1001.03 of the ZDO, all development in the County is subject to the several specified codes and/or ordinances adopted by the Board of County Commissioners (BCC) and incorporated into the ZDO. These include the Oregon Structural Specialty Code, Fire and Life Safety Code, and, pursuant to subsec. 1001.03F, any other code or ordinance adopted by the BCC. The latter provision includes the County Excavation and

Grading Ordinance, the County Roadway Standards and the County Road Use Ordinance that have particular importance in the review of design review applications. The latter two County ordinances are administered by the County Dept. of Transportation and Development (DTD), Construction and Development Sec. The County Roadway Standards also incorporate the Fire Apparatus Access Road Standards adopted by most of the fire districts in Clackamas County including the Clackamas County Fire District, the fire protection services provider for the area including the subject property. The relevance of these codes will be discussed later in these findings. Conditions of approval will be imposed to assure compliance with the codes and ordinances incorporated in the ZDO pursuant to subsec. 1001.03 of the ZDO.

No comments were received from the Clackamas County Building Services division. Each phase of development will require design review and the specific building plans will be reviewed at that time. Conditions of approval will ensure compliance with applicable structural, plumbing and electrical codes.

As of the date of this report comments have not been received from the Oak Lodge Water and Sanitary Districts. However, based on available topography data limited grading will be necessary and conditions of approval will ensure compliance with all grading codes applicable to the proposed development.

*With the imposition of certain conditions of approval this request can comply with this criterion.*

5. Section 1002 of the ZDO, Protection of Natural Features, contains standards for development affecting hillsides, trees and wooded areas, river and stream corridors, and wildlife habitats and distinctive resource areas. The provisions of Sec. 1002 are generally not applicable to the site as there is no evidence of any significant natural features adjacent to the development. According to the National Wetlands Inventory, North Urban Area ESEE analysis, FEMA floodplain data, and the County's River and Stream Conservation Area Maps there is no evidence of stream corridors, wetlands or associated floodplain areas on the subject property. Conditions of approval will ensure this issue is adequately addressed. Finally, review of aerial photography of the site does not identify any major significant vegetation; therefore, *with the imposition of appropriate conditions of approval this criterion can be satisfied.*
6. Section 1005 pertains to building siting and design, and has the following objectives:
  1. Energy conservation and use of solar potential for heat and light.
  2. Compatibility with surrounding neighborhood, uses, and the natural environment: This area along River Road is developed with a number of uses ranging from single family residences to multi-family projects similar to that proposed by the applicant.
  3. Crime prevention and security of persons and property: This criterion is somewhat difficult to assess, however the applicant addresses the issue by showing, parking lot layout, type and location of landscape materials, etc.
  4. Ensure that building orientation and site development include appropriate transit, bicycle and pedestrian oriented features, i.e. sidewalks, access ways, bikeways, pedestrian and bicycle amenities, bus shelters, bus pullout lanes and walkways within and between

developments: The preliminary plan provides for pedestrian access along SE River Road.

*As submitted, this application appears to satisfy applicable portions of Section 1005.*

7. Section 1006 of the ZDO, Utility Lines and Facilities, includes provisions relating to the need for water service, sewage disposal, street lighting and other utilities and is intended to provide for adequate services and facilities appropriate to the scale and type of development. Subsection 1006.02A of the ZDO states that the location, design, installation and maintenance of all utility lines and facilities shall be carried out with minimum feasible disturbance of soil and site consistent with the rules and regulations of districts for surface water management.

Subsec. 1006.02B of the ZDO states that all development that has a need for water service shall install water facilities and grant necessary easements pursuant to the requirements of the district serving the development. The subject property is within the Oak Lodge Water District. The Oak Lodge Water District has provided a signed Statement of Feasibility dated March 24, 2009. According to this document the district has adequate water service, including fire flows, to service the proposal. Based upon this evidence, staff finds that this proposal can satisfy the provisions of subsection 1006.02B of the ZDO subject to compliance with the requirements of the Oak Lodge Water District.

Subsec. 1006.02D of the ZDO requires that all development that has a need for public/private sanitary sewers shall install the facilities pursuant to the requirements of the district or company serving the development. Installation of such facilities shall be coordinated with the extension of necessary water services and storm drainage facilities. The Oak Lodge Sanitary Service District has submitted a Statement of Feasibility also dated March 24, 2009 concerning this development. According to these comments sufficient service is available.

Subsection 1006.02G of the ZDO states that street lighting shall be required for all developments inside the urban growth boundary. Streetlights shall be installed pursuant to the requirements of the County Service District #5 and the power company serving the development. In every instance, a street light shall be installed where a new road intersects the County right of way. Parcels outside Service District No. 5 will be required to annex into the district.

*The proposed development is consistent with Section 1006 of the ZDO provided that recommended conditions of approval are imposed.*

8. Section 1007 of the ZDO, Roads, Circulation and Parking, contains standards pertaining to the provision of safe and efficient access, interior circulation, frontage improvements and sufficient levels of parking. The subject property takes direct access to SE River Road. River Road is a county roadway; therefore, comments from the County DTD, Traffic Engineering and Development section dated May 4, 2009 have been summarized in the following paragraphs.

The applicant, County Planning and Engineering staff have met several times over many months as this master plan has been developed. The resulting master plan submittal, prepared by the applicant's consultant, provides sufficient detail to allow staff to recommend approval of the master plan, with conditions.

Staff wishes to acknowledge the considerable effort put forth by the applicant and the applicant's consultant in the development and completion of the master plan submittal. Since most issues between the applicant and the County have been resolved throughout the development of this master plan proposal, and since those solutions have been included in the master plan application, this memorandum is relatively brief and recommends only a few conditions of approval.

The master plan includes a phasing plan for Rose Villa Senior Living (five phases) that is acceptable to Engineering staff.

Access for the site, as illustrated and described in the master plan documents, is generally acceptable to Engineering staff. Staff has agreed to the proposed access scenario, which required a deviation from County standards for the multiple direct accesses to River Road, several of which also do not meet access spacing guidelines. This deviation was determined to be appropriate mainly due to the applicant's agreement to initially scale down and eventually eliminate operations on the easterly side of River Road. The anticipated safety improvement, resulting from fewer crossings of River Road by pedestrians and vehicles, is the principal reason additional accesses will be recommended for approval to River Road.

Staff also finds that the proposed accesses to Laurie Avenue, with North Drive aligned with Garden Parkway, and with South Drive aligned with Denny Street, are acceptable.

The North Drive access to River Road shall be temporary and shall be closed when alternative access is able to be provided via a crossover easement to the most southerly Willamette View Manor driveway. A detailed, recommended condition of approval is provided in this memorandum.

Design Review for each phase of the master plan is required and staff will provide specific recommendations for each phase, as the phases are submitted for review.

There is a small section of River Road frontage between phase two and phase three that is not identified for improvement during any of the proposed five phases of the master plan. This section of River Road shall be improved in phase two, unless it would provide a benefit to the public by delaying improvements to this section to phase three.

Page eight of the June 2, 2009, submittal, includes a narrative describing the eventual elimination of all operations on the easterly side of River Road. Staff recommends that the master plan approval include a condition requiring the applicant to meet the goals established in the submittal.

Page 15 of the June 2, 2009, submittal illustrates proposed conceptual street designs for River Road at the proposed North and South Drives. While parallel parking will be permitted along the westerly side of River Road, along the applicant's frontage, the easterly side is not anticipated to provide parallel parking. In addition, the landscape strip, illustrated at seven feet in width along the applicant's River Road frontage, is permitted to be a minimum of five feet in width. Specific requirements for landscape strip widths and sidewalk widths will be provided as each phase is evaluated through the Design Review process.

Pages 16 and 17 of the June 2, 2009, submittal illustrate conceptual street designs for Laurie Avenue and Schroeder Avenue. As multifamily streets, the standard width is 32 feet. The submittal illustrates these streets as 28 feet in width. Specific road width requirements will be specified as each phase is evaluated through the Design Review process.

*The DTD, Traffic Engineering and Development Review Section find that the relevant provisions of Section 1007 can be satisfied.*

9. Section 1008 of the ZDO provides for the control of storm water through management practices designed to minimize the amount of storm water runoff, maintain and improve water quality, prevent and reduce soil erosion and prevent structural and environmental damage. Subsection 1008.02 requires that a storm water drainage and erosion control plans be prepared by the applicant for review and approval by the Oak Lodge Sanitary District, the local surface water management agency. Oak Lodge Sanitary has reviewed the preliminary plan for compliance with the requirements of Sec. 1008 of the ZDO.

Review suggests the project is feasible but engineered plans need to be submitted for further review

*Staff finds that the relevant provisions of Sec. 1008 of the ZDO can be satisfied subject to review and approval of the final storm water management plans by the Oak Lodge Sanitary District.*

10. Section 1009 of the ZDO lists the approval criteria relative to landscaping. The applicant has submitted a preliminary landscape plan showing proposed landscaping throughout the development. This plan appears to satisfy the intent of Section 1009, however each individual stage shall be subject to Design Review.
11. Section 1010 of the ZDO lists approval criteria for signs. No signs have been proposed with this application.
12. Section 1021 of the ZDO discusses requirements relative to trash and recycling enclosures. It is unclear how the redesign of this development will affect the collection of garbage and recycling. Before issuance of a building permit, the applicant must provide detailed enclosure plan (full-sheet) and/or written garbage and recycling plan, complete with service truck circulation, to Susan Terry, Community Environment Division. She can provide the necessary information about size of service trucks and appropriate containers. She also must sign off on behalf of the service provider(s).
13. Notice of this application was sent to the Oak Lodge CPO, as well as to affected agencies. Responses received were outlined in the body of this report with the exception of the local CPO, which has not submitted comments as of the date of this report.

**DECISION:** The Clackamas County Design Review Staff recommend **approval** of this proposal with the following conditions.

- 1) Approval is for the specific project, the Rose Villa Master Plan, as identified in the application materials dated June 2, 2009. Each phase shall receive individual design review approval. As stated in the application, all phases are to be implemented within a ten (10) year time frame.
- 2) This approval is valid for a two year period from the date of the final decision and is void if a complete design review application for phase one (1) is not submitted to Clackamas County within that time period.

- 3) All development of the subject property is subject to the development standards contained in Sec. 1000 of the ZDO and those other relevant codes and ordinances adopted by the Board of County Commissioners pursuant to subsec. 1001.03 of the ZDO, including, but not limited to, the County Roadway Standards, County Excavation and Grading Ordinance, and Oregon Structural Specialty Code, etc.
- 4) Access locations for the site shall be consistent with the June 2, 2009, submittal, prepared by Myhre Group Architects. While the locations for the accesses are acceptable to Engineering staff, specifics regarding access width, curb radii, etc, shall be finalized at Design Review for each specific phase where an access is proposed to be created or modified.
- 5) The applicant shall initiate and complete the County's formal Design Review process, for each phase of the master plan, including providing an application that fully complies with the requirements of Zoning and Development Ordinance subsection 1102.07. Prior to submitting an application for Design Review for any phase, the applicant shall be required to participate in a Design Review pre-application meeting, for that phase, as required by Zoning and Development Ordinance subsection 1102.05 A.
- 6) The applicant shall meet or exceed the plans, goals, and time lines associated with the elimination of the East Property Operations, provided in the narrative on page eight of the June 2, 2009, submittal.
- 7) This condition is related to a crossover easement between the Rose Villa Senior Living properties and the Willamette View Manor properties, which are located northerly from the Rose Villa properties.

The Rose Villa properties are more specifically identified as the following:

T2S., R1E., Section 02AC, Tax Lot 0900  
T2S., R1E., Section 02AC, Tax Lot 1200  
T2S., R1E., Section 02AC, Tax Lot 1300  
T2S., R1E., Section 02AC, Tax Lot 1500  
T2S., R1E., Section 02AC, Tax Lot 1600  
T2S., R1E., Section 02DA, Tax Lot 3400  
T2S., R1E., Section 02DB, Tax Lot 0100  
T2S., R1E., Section 02DB, Tax Lot 0200  
T2S., R1E., Section 02DB, Tax Lot 3200

The Willamette View Manor properties are more specifically identified as the following:

T2S., R1E., Section 02AC, Tax Lot 0100  
T2S., R1E., Section 02AC, Tax Lot 0200  
T2S., R1E., Section 02AC, Tax Lot 0300  
T2S., R1E., Section 02AC, Tax Lot 0400  
T2S., R1E., Section 02AC, Tax Lot 0500  
T2S., R1E., Section 02AC, Tax Lot 0501  
T2S., R1E., Section 02AC, Tax Lot 0600  
T2S., R1E., Section 02AC, Tax Lot 0700  
T2S., R1E., Section 02AC, Tax Lot 0800  
T2S., R1E., Section 02AC, Tax Lot 1201  
T2S., R1E., Section 02AC, Tax Lot 1700

The easement connection between the Rose Villa properties and the Willamette View Manor properties is more specifically located between the properties identified as T2S., R1E., Section 02AC, Tax Lot 900 (Rose Villa) and T2S., R1E., Section 02AC, Tax Lot 800 (Willamette View Manor)

The applicant shall grant and record a minimum 24-foot wide easement, granting access between "North Drive" (Driveway 4 of the Rose Villa Master Plan) and the most southerly Willamette View Manor site access intersection with River Road to the owners, residents, employees, and visitors of the properties identified as Willamette View Manor, located northerly of the subject site, at a location determined by the applicant and approved by DTD.

Before the owner, residents, employees, and visitors of the properties identified as Willamette View Manor may use the easement over the Rose Villa site, that owner, of the Willamette View Manor site, shall grant to the owner of the Rose Villa site, a reciprocal easement for access purposes to and between the "North Drive" and the southerly Willamette View Manor site access on T2S., R1E., Section 02AC, Tax Lot 0900. This easement shall provide access from the Rose Villa site to T2S., R1E., Section 02AC, Tax Lot 0800 and River Road, and from the Willamette View Manor site to the Rose Villa site.

Neither the grading plan for this site, nor the construction of any structures shall preclude the future use of the easement. The applicant may use the land subject to the easement as desired until the owner of the properties identified as Willamette View Manor grants and files the reciprocal easement with the deeds to the properties. The applicant shall file the easement in the County Records Office prior to occupancy of any of the housing units constructed in phase one of the Rose Villa development.

If the owner of Willamette View Manor grants its one-half of the crossover easement within six years of the recording date of the crossover easement granted by the owner of the Rose Villa properties, the owner of the Rose Villa properties shall arrange for the construction of that portion of the easement on the Rose Villa site, no later than six years from the date the easement was recorded by the owner of the Rose Villa properties. The easement is required to provide pedestrian, bicycle, and motor vehicle access between the Rose Villa properties and the Willamette View properties, and also River Road. In addition the owner of the Rose Villa properties shall arrange for the permanent elimination of the "North Drive" driveway approach, or conversion of the "North Drive" driveway approach to River Road to an emergency only access, only if required by the local Fire District, and as approved by DTD.

Alternatively, if the granting of the one-half of the crossover easement by the owner of the Willamette View Manor properties occurs more than six years after the recording of the crossover easement by the owner of the Rose Villa properties, the owner of the Rose Villa properties shall, within one year of the recording of the crossover easement by Willamette View Manor, arrange for the construction of its portion of the crossover easement. Furthermore, the owner of the Rose Villa properties shall arrange for the permanent elimination of the "North Drive" driveway approach, or conversion of the "North Drive" driveway approach to River Road to an emergency only access, if required by the local Fire District, and as approved by DTD, also within one year of the date the crossover easement is recorded by Willamette View Manor.

**ESA Disclaimer**

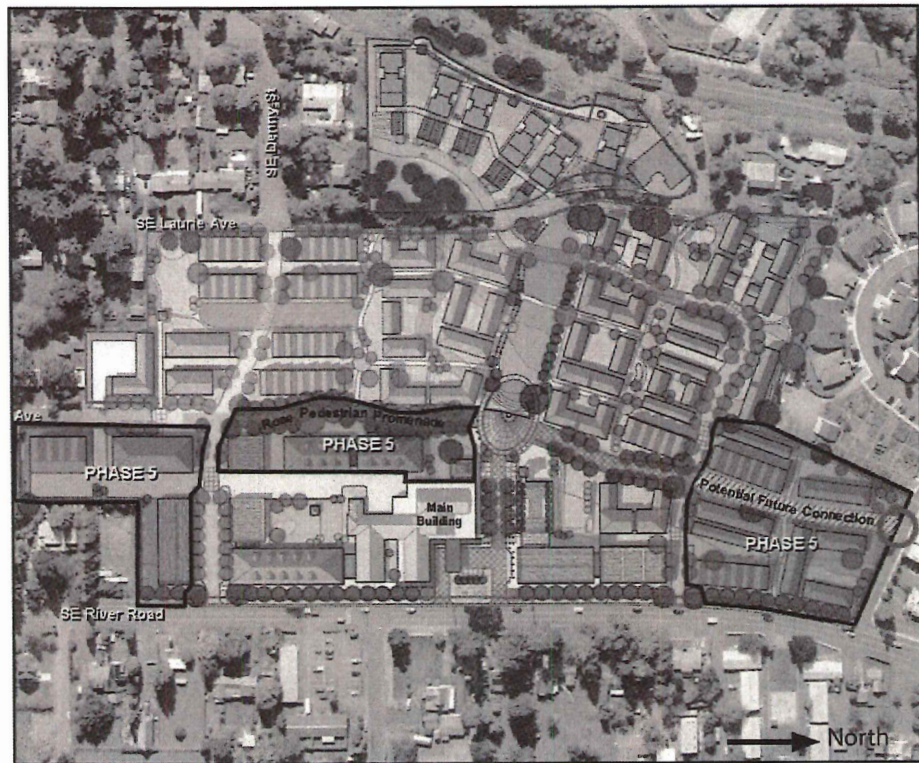
The approval of the application granted by this decision concerns only the applicable criteria for this decision. The decision does not include any conclusions by the county concerning whether the activities allowed will or will not come in conflict with the provisions of the federal Endangered Species Act (ESA). This decision should not be construed to or represented to authorize any activity that will conflict with or violate the ESA. It is the applicant, in coordination if necessary with the federal agencies responsibility for the administration and enforcement of the ESA, who must ensure that the approved activities are designed, constructed, operated and maintained in a manner that complies with the ESA.

IF YOU HAVE ANY QUESTIONS ABOUT THIS APPLICATION, PLEASE CONTACT THE PLANNING DIVISION OFFICE. IF YOU DISAGREE WITH THESE FINDING OR CONDITIONS, YOU MAY APPEAL THIS DECISION TO THE CLACKAMAS COUNTY HEARINGS OFFICER. THE COST OF THE APPEAL IS **\$250.00**. YOUR APPEAL MUST BE RECEIVED IN THE PLANNING DIVISION OFFICE BY 5:30 P.M. ON THE LAST DATE TO APPEAL, WHICH IS **June 29, 2009**. NO PERMITS WILL BE ISSUED UNTIL THE DAY AFTER THE APPEAL DEADLINE.

### PHASE FIVE ACCESS STRATEGY

Phase Five will provide the continuation of Rose Pedestrian Promenade across campus towards the south. This will serve as a continuous pedestrian spine through campus, while also providing emergency vehicle and service access to this portion of campus. Improvements along River Road will occur along Phase Five's building frontage (see diagram on page 18).

Through the north portion of development, open space will allow for a potential future access drive connection to Willamette View. In this case, the access point on River Road to North Drive would be closed and shared access would occur at Willamette View's existing access drive.



### EAST PROPERTY OPERATIONS

As soon as the existing uses on the east property are accommodated in the master plan west of River Road, Rose Villa will begin to actively market the property. One of Rose Villa's primary objectives is to get all of its operations onto the main campus west of River Road.

The following uses must be provided west of River Road before marketing the east property:

- Large, multipurpose indoor/outdoor workspace to be shared by the Grounds, Maintenance, and Renovations Departments
- Residents' Wood Shop
- Employee parking

The east property could be used temporarily as building construction staging during development phasing provided that its existing uses are relocated beforehand.



**Fritzie, Martha**

---

**From:** Snuffin, Christian  
**Sent:** Tuesday, November 4, 2025 3:16 PM  
**To:** Fritzie, Martha  
**Cc:** Campi, Taylor  
**Subject:** Rose Villa (Z0247-25 & Z0248-25)

Hi Martha,

I reviewed the applicant's submittal for the Comp Plan/zone change application from Rose Villa (Z027-25 & Z0248-25) – in particular, the technical memorandum prepared by Lancaster Mobley and dated June 11, 2025.

Based on my review, I believe the memo provides sufficient information to address the TPR (OAR 660-012-0060), as well as Clackamas County ZDO 1202.03(C) and 1202.03(D). Please let me know if you have any questions.

**Christian Snuffin, PE**  
503.680.5623

---

**From:** Fritzie, Martha <MFritzie@clackamas.us>  
**Sent:** Thursday, October 23, 2025 9:10 AM  
**To:** Snuffin, Christian <CSnuffin@clackamas.us>  
**Cc:** Campi, Taylor <TCampi@clackamas.us>  
**Subject:** Z0437-25 & Z0438-25: another new Comp Plan/zone change application!

Hi Christian. The new Comprehensive Plan/zone change application (and associated traffic analysis) that I was referencing yesterday is saved here: <S:\Planning\1.APPLICATIONS\2025 Land Use Applications\Applications\Z0437-25\02.ApplicationPackage\01.SubmittedApplication>

I will be reviewing the application for completeness next week, but would like you to review the traffic study. For this purpose, I have two questions for you:

- (1) Is this traffic study sufficient to address the TPR (whether or not you agree with the conclusion); and
- (2) Is there sufficient information in here to address the safety of the system (per ZDO 1202.03(D))?

Please take a look and let me know your thoughts on the completeness by the end of next week (10/31), if possible.

Also – I wanted to make sure that you received the hearing notice for the Comp Plan/zone change application from Rose Villa (Z0247-25 & Z0248-25). I think you worked with them on the additional information they needed to provide related to the prior condition of approval that limited the use of properties on the east side of River Rd. I don't need comments for that for a couple of weeks – did want to make sure you got the notice and it is on your radar though.

Let me know if you have any questions.

Thanks,  
Martha

---

Martha Fritzie, Principal Planner  
Clackamas County DTD | Planning & Zoning  
150 Beavercreek Road | Oregon City, OR 97045  
[mfritzie@clackamas.us](mailto:mfritzie@clackamas.us)  
(503) 742-4529

---

*Working hours 7:30am to 6:00pm | Monday – Thursday*

---

Please visit our [webpage](#) for updates on Planning services available online, service hours and other related issues.

Follow Clackamas County: [Facebook](#) | [Twitter](#) | [YouTube](#) | [Nextdoor](#)

*Any opinion or advice provided herein is informational only, and is based on any information specifically provided or reasonably available, as well as any applicable regulations in effect on the date the research was conducted. Any opinion or advice provided herein may be revised, particularly where new or contrary information becomes available, or in response to changes to state law or administrative rule, future legislative amendments of the Zoning and Development Ordinance, decisions of courts or administrative tribunals, or quasi-judicial land use decisions.*

*This is not a land use decision as defined by Oregon Revised Statutes 197.015(10).*