

## CITY COUNCIL MEETING

## STAFF REPORT

Meeting Date: July 21, 2025	<b>Subject:</b> Public Safety Project Update - Enforcement Solutions for RVs and Abandoned Vehicles	
	<b>Staff Member:</b> Amanda Guile-Hinman, City Attorney Hannah Young, Law Clerk	
	Department: Legal	
Action Required	Advisory Board/Commission Recommendation	
Motion	Approval	
Public Hearing Date:	Denial	
Ordinance 1 <sup>st</sup> Reading Date:	None Forwarded	
Ordinance 2 <sup>nd</sup> Reading Date:	☑ Not Applicable	
Resolution	Comments: N/A	
Information or Direction		
Information Only		
Council Direction		
Consent Agenda		
Staff Recommendation: N/A		
Recommended Language for Motio	n: N/A	
Project / Issue Relates To:	· · · · · · · · · · · · · · · · · · ·	
	dopted Master Plan(s):	
2025-27 Council Goal No. 2:		
Public Safety; Strategy 2.1		

#### **ISSUE BEFORE COUNCIL:**

Council input on alternatives analysis of current Wilsonville Code provisions governing parking regulations applicable to recreational vehicles (RVs) and governing abandoned vehicles. Council feedback on draft outreach plan.

#### **EXECUTIVE SUMMARY:**

As part of its 2025-27 Council Goals, the City Council adopted Goal 2: Public Safety. The first outcome identified in Goal 2 is to "streamline response to code enforcement challenges." To achieve this outcome, Strategy 2.1 calls for the City to "investigate enforcement solutions for RVs (and examine abandoned vehicle definition in code)." Based on Strategy 2.1, this staff report is divided into three main topics: (1) parking regulations, particularly relating to RVs; (2) abandoned vehicle regulations; and (3) a draft public outreach plan. Prior to addressing each of these topics, this staff report provides background information on the identified issues and parking enforcement data. From the information provided herein, during the July 21, 2025 work session, staff seeks the following feedback from Council:

- 1. At this time, does Council have any questions or feedback regarding the alternatives analysis of the relevant code provisions staff is performing?
- 2. Are there any other alternatives that Council wants staff to examine?
- 3. Does Council have any feedback or questions regarding the draft outreach plan?

#### I. <u>BACKGROUND</u>

Based on the implementation timeline identified in the approved Council Goals, staff began working on the first outcome of Goal 2 in May 2025. An interdepartmental team consisting of employees from Legal, Police, Code Compliance, Administration, and Community Development met to discuss the strategies identified for the outcome of streamlining response to code enforcement challenges. A chart of each subgroup for the five (5) strategies is provided below:

Strategy	Subgroup Members
2.1 – Investigate enforcement solutions for	Legal, Code Compliance, Police,
RVs (and examine abandoned vehicle	Administration
definition in code)	
2.2 – Update Chapter 1 code enforcement	Legal, Code Compliance, Planning, Building,
process and penalties (incl. admin process	Administration, Police (optional)
instead of police citation)	
2.3 – Update Nuisance code provisions, with	Legal, Code Compliance, Planning (optional),
particular review of noxious vegetation,	Natural Resources (stormwater), TVF&R (fire
property appearance, noise, and other	season)
chronic nuisances	
2.4 – Investigate developing a graffiti	Legal, Code Compliance, Police,
enforcement/reward program	Administration, Public Works (optional)
2.5 – Review Clack Co administrative warrant	Legal, Code Compliance, Police,
process and consider whether City should	Administration, Building, Planning
adopt a similar local process	

After the project kick-off meeting in May, the subgroup for Strategy 2.1 ("Strategy 2.1 Subgroup") met to discuss the current issues regarding parking, particularly as to RVs, and relatedly, the potential interplay with the City's abandoned vehicle code provisions.

## A. Issues Identified

The Strategy 2.1 Subgroup discussed concerns expressed by Council and community members regarding RVs. Staff noted the following regarding the concerns:

- The City can regulate the public right-of-way (City streets), which is distinct from property owners regulating their private property.
- People park RVs on City streets for a myriad of reasons, such as to prepare for travel, short-term stays with family or friends, or to engage in rest. Consideration of new regulations for RVs parked on City streets should focus on specific public health, safety, and welfare concerns without being overbroad or vague.
- While people park RVs on City streets, few exceed the 72-hour limit for parking on public rights-of-way. Many move at some point in time, but may return to a previous location, giving the appearance that they had not moved. Some recent examples of RVs that parked longer than 72 hours (one on SW Parkway Avenue near the 76 gas station and one on SW Courtside Drive near Goodwill) moved either voluntarily (the one at Parkway) or involuntarily (the one at Courtside).
- Towing RVs is complex few tow companies are willing to tow and/or store the RVs and the cost of towing is high. The cost to tow a single RV is generally between \$7,000 and \$10,000 because it includes the tow, sanitization, and storage. If an RV has additional hazardous or environmental concerns, the cost can be higher.
- The City must have the capacity to enforce any new regulations, so administrative, enforcement, and cost burden must be considered, along with public health, safety, and welfare factors.
- With increased visibility of parked RVs, both on private property (regulated by the property owner) and on City streets, the concern is to ensure that the City has the necessary tools available, so the City does not see a proliferation of RVs parked on City streets for extended periods of time. In other words, the current issue identified by staff is to proactively address any gaps in enforcement of long-term RV parking that may exist to ensure the City can maintain the public health, safety, and welfare.

### B. Parking/Traffic Enforcement Data

Since May 2022, the Wilsonville Police Department began monthly reporting of traffic details, which includes calls for extra patrols, parking complaints, and traffic complaints. Since June 2022 (the following month), the monthly reports included notes to better identify the reason for the calls. City staff analyzed all monthly reports from June 2022 (when the notes were included) through May 2025 to better understand the volume of complaints related to 72-hour parking

violations/abandoned vehicles and to RV issues compared to all parking complaints and all combined complaints. While the data includes many nuances, such as calls that resulted in a determination that there was no violation or that the vehicle was located on private property, the data does help to understand the types, volume, and relative percentage of various vehicle parking complaints. Attached to this staff report as **Attachment 1**, is the year-over-year comparison of parking complaints, broken out into specific categories. Attachment 1 not only includes averages for each year but also breaks down the averages by month.

Chart 1 below is the annual average number of complaints related to five (5) distinct issues: 72hour/abandoned vehicle parking; private parking issues; city parking lot issues; semis/commercial trailer parking; and RV/camp trailer parking.



#### Chart 1: Year-Over-Year Averaged Parking Complaints

Chart 2 below is a percentage comparison specifically of 72-hour/abandoned vehicle parking (ABV) issues and RV/camp trailer parking issues to all parking complaints and all traffic complaints from 2022 to 2025.



# Chart 2: Percentage Comparison of 72Hr/ABV Issues and RV Issues to All Parking and All Traffic Complaints

The data analysis suggests that a significant portion of parking complaints involve alleged violations of the 72-hour parking limit regulation. Thus, some of the alternatives proposed by staff for further Council/community input involve updates to the 72-hour parking limitation. The proposed alternatives may be an approach that can further address both RVs parked on City streets and the more typical calls regarding long-term vehicle parking.

### II. PARKING REGULATIONS

While Strategy 2.1 specifically focused on RVs and abandoned vehicles, the Strategy 2.1 Subgroup analyzed the existing applicable Wilsonville Code provisions regarding parking and abandoned vehicles more generally to identify areas where updates to current regulations may be helpful to not only address RVs parked on City streets for extended periods of time, but also other parking issues identified from the data. In addition, staff examined the municipal codes of several surrounding jurisdictions regarding their parking, abandoned vehicle, and RV regulations (if expressly differentiated from other parking regulations). Attached as **Attachment 2** is the Parking, Abandoned Vehicles, RV Regulation Comparison Chart.

In this Section II, staff review current, relevant Wilsonville Code parking regulations and then discuss possible alternatives to the parking regulations that Council may want to explore further and are intended to be included in the public outreach plan. Throughout the alternatives discussion, staff will note when other jurisdictions utilize such alternatives. The three parking regulations alternatives discussed below are: (1) retaining the 72-hour limit and adding a 24-hour minimum before returning; (2) establishing different time limits for different land use zones; and (3) an RV parking permit program.

## A. Current Wilsonville Code

## i. Wilsonville Parking Regulations

Current City regulations require that vehicles cannot be parked on City streets more than 72 hours, at which point vehicles must be moved at least three car lengths away. <u>WC 5.210(9)</u>. The Wilsonville Code does not specify <u>how long</u> a vehicle must be moved from a given area before returning. Of the eight (8) jurisdictions reviewed (*see* **Attachment 2**), they all include a parking or storage regulation limiting parking on public streets; six (6) have a 72-hour limit and two (2) have a 24-hour limit. In Wilsonville, from June 2022 through May 2025, 72 Hour Parking Violations/Abandoned Vehicles made up 27.97% of total parking calls received by law enforcement in Wilsonville. On average, law enforcement receives ten (10) calls per month related to vehicles allegedly violating the current 72-hour rule. Some of those calls resulted in a determination by law enforcement that no enforcement could occur because the vehicle in question did move, but allegedly for a relatively short period of time. Calls regarding RVs are often linked to this 72-hour rule. Thus, as discussed below, the Council may consider updates to the 72-hour parking rule, which may address some of the concerns regarding RVs.

The City also has regulations about towing vehicles (WC 5.400-5.460). WC 5.415 specifically discusses circumstances where vehicles may be towed without prior notice, most notably:

(d): a vehicle required by law to display license plates does not, or displays plates registered to a nonmatching vehicle, and the VIN is not visible or does not indicate ownership, or the owners of the vehicle/persons with interest in vehicle cannot be determined after inquiry to license and registration agency.

(p): The vehicle registration as indicated by sticker or card has been expired for 90 days or more, the vehicle is required to be registered when operated on a highway and the vehicle is parked or being operated on City streets.

In addition to WC 5.415(1)(p), Clackamas County has a similar regulation, Clackamas County Code <u>Section 7.01.020</u>(K) governing vehicles that have expired tags for 90 days or more.

## B. Alternatives Analysis

## i. 72-Limitation + 24 Hours Before Returning

As mentioned, current regulations in Wilsonville require that after a 72-hour period, vehicles must be moved at least three car lengths away. There are no conditions for how long a vehicle must be away from a given area before returning. From 2022-2025, 72 Hour Parking and Abandoned Vehicle complaints made up 27.97% of total parking calls received by law enforcement in Wilsonville.

A possible amendment to <u>WC 5.200</u> would introduce an additional requirement that all vehicles parked for a 72-hour period must be moved for a minimum of 24 hours before returning. The goal of this update would ensure that owners of vehicles will not continue the practice of moving their vehicle for a short period (sometimes as brief as 30 minutes) to "restart" another 72-hours that their vehicle may remain on public roads. Since code violation investigations are primarily complaint driven, under this alternative, code enforcement will be able to notify the owner/occupier of the vehicle, document the point of contact and track whether the vehicle is gone for the required time. This documentation would also promote accurate and fair citation practices for those who violate.

This alternative proposes a low-cost update to Wilsonville's City Code. By requiring vehicles to remain in another location for at least 24 hours before returning to a previous street parking location, Code Enforcement will have a standardized rule to monitor compliance without requiring unreasonable vigilance or expense of resources. These updated code provisions would also address the concern of RVs overstaying the same parking time limits. The primary concern is efficacy in solving Council-identified issues without known outcomes. By adopting this alternative, Council could supplement by updating other areas of Wilsonville's code—such as a stricter abandoned vehicle definition (described below in Section III). By combining multiple updates to relevant code provisions and boosting code enforcement efforts, overall compliance may be increased.

## ii. Zoning Differentiation

Another alternative to current City parking regulations is to establish zone-specific parking regulations (e.g., residential, commercial, and industrial). Specific regulations may include variations of permittable parking hours, length of time away before a vehicle may return, etc. Zoning designations would mirror already defined zones in Wilsonville Code Chapter 4. Wilsonville has ten (10) different zones, some with further subdistricts, as well as four overlay zones. If this alternative is explored further, precision in descriptions of the different parking zones will be paramount.

By establishing zone-based regulations, existing concerns in each area could be addressed specifically and effectively. Costs associated with this alternative would include production and posting of appropriate signage in each zoned area. If implemented, staff and Roads Maintenance

would work to assemble a project proposal with exact placement and number of signs to produce per designated zone.

Currently, Wilsonville has 395 "No Parking" signs throughout the City. Roads Maintenance reported that installation of 1 parking sign has approximately \$75 dollars and 2 hours of labor associated with the process. This amounts to approximately \$30-45 in materials for production and installation of a blank sign (i.e. pole, gravel, anchor, set) and an additional \$25 in the vinyl materials for the sign content.

This alternative may lead to some confusion for residents, businesses, and visitors regarding the length of time parking is allowed and will also require ongoing education with law enforcement and code enforcement about what time regulations apply to which areas. Staff will also need to ensure that such regulations are precise when describing zoning areas and may need updates from time to time when the City adopts new land use zones.

## iii. RV Parking Permit Program

During the Council goal-setting retreat, one concept discussed was the possibility of implementing an RV Parking Permit program similar to those of other jurisdictions. Currently, Wilsonville experiences an average of 1-2 calls per month regarding RV/Camp Trailer parking—accounting for 3.21% of all parking calls spanning from 2022-2025.

City staff reviewed the RV Parking Permit programs of the four (4) jurisdictions in Oregon that currently have a program – Gresham, Keizer, Sandy, and McMinnville. **Attachment 3** includes a review of the RV Parking Permit Programs. Staff also contacted each jurisdiction to discuss the implementation and outcomes of the programs.

The RV Parking Permit programs reviewed require RV owners who desire to park their RV outside their homes on public streets apply and obtain a free 72-hour parking permit. The permit is obtained through the jurisdiction's website, and community members print the permits from home. These permits would be subject to several conditions. A single permit may be renewed twice, for longer stays. No more than a total of six (6) permits may be issued to a single owner within a year. This program is also subject to exceptions, such as a 12-hour "loading and unloading" period where a permit will not be required.

Under this program, if an RV does not have an issued permit, or cannot be verified that it belongs to a lawful tenant/property owner, a citation notice may be left, alerting that within 24 hours, the RV will need to be removed. If 24 hours passes without removal, the City will gain the right to tow. Compliance efforts will be led by Code Enforcement, and permits will be tracked and managed through the City's current case management system. If the City adopts this program but maintains a mostly complaint-driven enforcement, there will likely not be any additional administrative burden to Wilsonville's Code Enforcement officers.

Reported compliance and reception from the four jurisdictions is mixed. These mixed reactions are attributed to several variables. Overall enforcement and compliance are largely driven by the capacity of code enforcement. Efficacy of this program is difficult to measure. However, in jurisdictions where compliance efforts are vigilant and self-initiated by code enforcement, this program offers a streamlined approach to RV removal by the notice and tow.

When considering this alternative, staff examined the efficacy of the City's current residential parking permit program. The application process for which goes through the City Manager. However, designation for residential permits is difficult to obtain, and only apply to specific residential areas that display sufficient need. For example, the designation process requires a full petition and public meeting with the City Manager, creating additional administrative burden. Currently, only two (2) residential areas qualify for parking permit programs—Brenchley Estates and Meadows. Furthermore, the administrative expenses and workload associated with the program are costly. Currently, due to the decreasing number of permits issued each year, the cost of permits (\$25 per permit) is not sufficient to cover administrative costs (purchasing of stickers, mailings, etc.).

Reception and utilization of permit programs is mixed. Of the two enrolled neighborhoods, peak participation occurred in 2020 with 56 total households—22 of 30 in Brenchley and all 26 in Meadows. Since then, enrollment has steadily declined. As of 2025, only 10 Brenchley households and for (4) in Meadows remain enrolled. If implemented, similar participation concerns may impact other potential programs such as zone designation or RV permit programs.

Concerns around this program include the risk of overregulation without solid evidence-based outcomes from jurisdictions where these programs are already in place. Furthermore, this program risks creating additional workload for community members who own RVs, while not addressing the central issue of individuals camping or leaving their RVs in public streets for extended periods of time. Costs associated with these programs would include additional expenditure on towing RVs. As mentioned above, this is an expensive process (\$7,000-\$10,000/tow), and budgetary adjustments may need to be considered as part of implementation.

### III. ABANDONED VEHICLE REGULATIONS

In this Section III, staff review current, relevant Wilsonville Code and state statutes governing abandoned vehicles and then discuss possible updates to the City's abandoned vehicle regulations. Staff will also note other jurisdictions that utilize similar regulations. The comparison chart in **Attachment 2** includes a review of other jurisdictions' abandoned vehicle regulations.

## A. Current Wilsonville Code and State Statutes

*i.* Wilsonville Abandoned Vehicle Regulations

Wilsonville Code <u>5.035(1)</u> includes a definition of "abandoned vehicle" as follows:

"A vehicle left unoccupied or unclaimed or in a damaged or dismantled condition such that the vehicle is inoperable."

If a vehicle is determined to be abandoned, the City has regulations governing towing of the abandoned vehicle, located at <u>WC 5.400-5.460</u>. After providing notice required under <u>WC 5.410</u>, and, if requested, a hearing under <u>WC 5.435</u>, if the Municipal Court determines the tow is validated pursuant to <u>WC 5.445</u>, an authorized officer may tow and impound a vehicle for several reasons, including if:

"The Authorized Officer has probable cause to believe the vehicle is stored or abandoned which is parked or left standing upon the right-of-way of any street or alley or upon any City property for a period in excess of 72 hours." See <u>WC 5.405(1)(a)</u>.

With the City's authority to tow abandoned vehicles, the definition of what constitutes an abandoned vehicle is critical to the City asserting this authority. As noted in the alternatives analysis in Subsection B below, the City's definition of abandoned vehicle is similar to some jurisdictions but is not as encompassing as several other jurisdictions, limiting the City's ability to tow vehicles that may *appear to be* abandoned.

ii. State Statutes

While the Oregon Revised Statutes do not have an express definition for what constitutes an "abandoned vehicle," the statutes do provide a mechanism to tow vehicles if they are determined to be abandoned. ORS 819.100 states:

"(1) A person commits the offense of abandoning a vehicle if the person abandons a vehicle upon a highway or upon any public or private property.

(2) The owner of the vehicle as shown by the records of the Department of Transportation shall be considered responsible for the abandonment of a vehicle in the manner prohibited by this section and shall be liable for the cost of towing and disposition of the abandoned vehicle.

(3) A vehicle abandoned in violation of this section is subject to the provisions for towing and sale of abandoned vehicles under ORS 819.110 to 819.215.

(4) The offense described in this section, abandoning a vehicle, is a <u>Class B traffic violation</u>." ORS 819.100 (emphasis added).

The Wilsonville Code provisions governing the process of towing abandoned vehicles are consistent with the Oregon statutes.

## B. Alternatives Analysis

## *i.* Updating Code Definition of Abandoned Vehicle

Current abandoned vehicle code provisions in Wilsonville provide that an authorized officer may order an abandoned vehicle to be towed after it has been left standing for at least 72 hours, as long as notice is provided. Notices of removal are required to be given 24 hours prior to removal/towing.

By further specifying and expanding the definition of what constitutes an abandoned vehicle in the Wilsonville Code, law enforcement will be provided with greater clarity and the discretion the current code lacks. Other jurisdictions have recently made similar updates to code language allowing for enhanced enforcement capacity to address community concern.

For example, as documented in **Attachment 2**, Sherwood most recently adopted language defining an abandoned vehicle as one that has remained in the same location for more than 48 hours and meets one or more of the following conditions: (1) expired plates; (2) appears to be inoperative or disabled; or (3) appears to be wrecked, partially dismantled, or junked. Similar language is in effect in Tigard and McMinnville. As part of its update, Sherwood also established an abandoned vehicle offense that is subject to additional civil penalties.

Incorporating language that allows any one of these conditions to trigger the notice and removal process provides law enforcement with more actionable criteria, streamlining response times and ensuring more consistent application of the code. Other jurisdictions have recently expanded their code's definition of abandoned vehicles to offer the same functionality to enforcement officers.

If implemented alongside other provided alternatives, such as the 24-hour minimum before returning to park described above in Section II, code updates to both how long a vehicle must be removed before return, and expanding the criteria to determine if a vehicle is "abandoned" would provide a comprehensive plan for actionable response from law enforcement to address community concerns surrounding parking of all vehicles, RVs included.

Normal administrative costs that are associated with publishing ordinances, and providing updates to all relevant public agencies, such as Clackamas County Sheriff. Furthermore, enforcement efforts may need to be rigorous at the outset to support compliance and visible impact in the community.

#### IV. OUTREACH PLAN

The Community Outreach Plan (**Attachment 4** attached hereto) for the City's vehicle code revision project consists of four (4) different components of outreach. Namely, (1) educational information; (2) community survey; (3) stakeholder surveys and interviews; and (4) interviews with individuals with lived experience.

<u>Educational Information</u>: Staff plan to develop an overarching summary of the current issue, the goals the City seeks to achieve by completing the questionnaire and provide relevant background information regarding the City's current code, enforcement and capabilities. This will precede the survey on *Let's Talk Wilsonville*!.

Upon completion of the survey, participants will receive a "Thank You for Participating" email to their inbox along with included frequently asked questions (FAQs) to provide additional information.

<u>Community Questionnaire</u>: Staff have taken examples from previous outreach efforts for similar programs regarding livability in Wilsonville to develop draft questions for a community survey. The goal of the survey will be to receive engagement from the wide range of community groups and areas in Wilsonville. Staff is working with Communications on developing quality questions and ensuring that posting is widespread to reach as many residents as possible on current concerns community members face and allowing for participants to rank their support for the various alternatives detailed above.

<u>Stakeholder Interviews and Involvement</u>: Staff have developed a list of stakeholders, based on research efforts on who may be most impacted by code updates and new programs. This list includes public agencies, local businesses, RV owners, individuals impacted by houselessness who are living in RVs and homeowners associations (HOAs). Staff have designed individualized questions for each stakeholder survey ensuring engagement on pertinent data points and concerns from each category.

The staff team has discussed conducting in-person interviews in spaces that feel safe to interviewees who are currently impacted by houselessness and are living in RVs throughout Wilsonville. The team has also discussed providing gift cards for participation.

#### **EXPECTED RESULTS:**

Staff anticipate that updates to the City's parking regulations can address some of the public health, safety, welfare, and livability issues that community members express either to Council or through calls to law enforcement.

#### TIMELINE:

Staff anticipate engaging in the public outreach plan in fall 2025 and returning to Council in early 2026 with feedback and refined recommendations. Assuming Council desires to update the City's parking regulations, work sessions and proposed Council adoption are planned for spring-

summer 2026. Council Goal No. 2 has a planned completion in fall 2026 for all strategies.

#### **CURRENT YEAR BUDGET IMPACTS:**

Staff do not anticipate current year budget impacts outside of public outreach costs discussed below – this project is currently being managed in-house by City staff. However, new programs will have administrative overhead costs to deploy them. Moreover, towing RVs generally costs between \$7,000 and \$10,000 per tow. The City currently does not have a dedicated fund for this cost.

Staff anticipates that, as Council continues to discuss the strategies under the outcome to streamline responses to code enforcement issues, a larger discussion regarding funding of code enforcement will need to occur. While any one proposed change regarding code enforcement may not indicate a need for a dedicated funding source, the potential combination of multiple new programs (administrative warrants, graffiti mitigation, RV towing) will be cost-prohibitive without a revenue source. While staff is not proposing a funding source at this time, Council should be aware that multiple new public safety programs may require discussions about how to fund the programs.

Community Outreach costs may include production and distribution of advertising materials (e.g., social media, mailers etc.) and will be absorbed by departmental budgets.

#### COMMUNITY INVOLVEMENT PROCESS:

See discussion in Section IV above regarding the draft outreach plan.

#### POTENTIAL IMPACTS OR BENEFIT TO THE COMMUNITY:

Ensuring that the City has the tools necessary to proactively prevent the proliferation of longterm RV parking on city streets can address livability concerns. To ensure that all stakeholders' input is heard, staff recommend that an outreach plan includes outreach to people who park RVs on City streets. This strategy will aid the City in crafting regulations that address specific concerns without being overbroad, vague, or inflexible in the City's longstanding approach to code compliance. The goal is to balance livability concerns with providing reasonable regulations for people with RVs to achieve compliance.

#### ALTERNATIVES:

Staff propose further exploration of each alternative discussed in Sections II and III above. Particularly regarding the alternatives proposed in Section II, staff propose an outreach plan to obtain community and stakeholder input regarding the regulation of RV parking on City streets.

#### **CITY MANAGER COMMENT:**

N/A

#### ATTACHMENTS:

- 1. Traffic Detail Report Analysis for June 2022 through May 2025
- 2. Parking, Abandoned Vehicles, RV Regulation Comparison Chart

- 3. RV Permit Program Chart
- 4. Draft Public Outreach Plan