

CITY OF ST. HELENS PLANNING DEPARTMENT
STAFF REPORT
Comprehensive Plan Map and Zoning District Map Change CPZA.1.23

DATE: August 25, 2023
TO: Planning Commission
FROM: Jennifer Dimsho, AICP, Associate Planner

APPLICANT: Columbia Community Mental Health (CCMH)
OWNER: Same as applicant

ZONING: Light Industrial (LI)
LOCATION: 58646 McNulty Way; 4N1W-9BB-300 & 4N1W-8AD-200
PROPOSAL: Comprehensive Plan Map Change from Light Industrial (LI) to General Commercial (GC) and a Zoning Map Amendment from Light Industrial (LI) to General Commercial (GC)

The 120-day rule (ORS 227.178) for final action for this land use decision is **not applicable**.

SITE INFORMATION / BACKGROUND

The subject properties abut Gable Road and McNulty way. McNulty Creek cuts through the southeast portion of the property. There is extensive permitting history on the two subject properties which is summarized below:

2003 – CCMH received approval with County file (DR 3-09) to develop a 4.1-acre site with a 20,766 sq. ft. main CCMH building. County building permits approved in 2004.

2005 – 4.1-acre lot is annexed into the City.

2016 – 5.67-acre lot records restrictive covenant to bind smaller lots into one (Inst. No. 2016-010344)

2016 – CCMH received approval with SDRm.5.16 & SL.3.16 for a parking lot expansion partially in the McNulty Way right-of-way, and in close proximity to McNulty Creek.

2017 – CCMH received approval with County file DR 17-03 to build a 2,505 sq. ft. modular building on the 5.67-acre lot and convert an existing detached single-family dwelling into supporting office.

2018 – CCMH received approval with County file DR 18-07 to build two additional modular offices at 1,440 sq. ft. and 560 sq. ft. on the 5.67-acre lot

2019 – As part of DR 18-07 approval, the 5.67-acre lot was annexed into the City because the main campus building was already connected to City water.

The main campus building is connected to City sewer on McNulty Way with a private pump station and pressurized system. All other structures utilize on-site septic systems. All structures are connected to City water.

PUBLIC HEARING & NOTICE

Public hearing before the Planning Commission for *recommendation to the City Council*: September 12, 2023. Public hearing before the City Council: October 18, 2023.

Notice of this proposal was sent to the Oregon Department of Land Conservation and Development on August 1, 2023, through their PAPA Online Submittal website.

Notice of this proposal was sent to surrounding property owners within 300 feet of the subject properties on August 23, 2023, via first class mail. Notice was sent to agencies by mail or e-mail on the same date.

Notice was published on August 30, 2023, in The Chronicle newspaper.

AGENCY REFERRALS & COMMENTS

Columbia County Public Works: We have no comments or concerns with this CPZA application. Gable Road is a City Street in this area.

APPLICABLE CRITERIA, ANALYSIS & FINDINGS

SHMC 17.20.120(1) and (2) – Standards for Legislative Decision

- (1) The recommendation by the commission and the decision by the council shall be based on consideration of the following factors:
 - (a) The statewide planning goals and guidelines adopted under ORS Chapter 197;
 - (b) Any federal or state statutes or guidelines found applicable;
 - (c) The applicable comprehensive plan policies, procedures, appendices and maps; and
 - (d) The applicable provisions of the implementing ordinances.
 - (e) A proposed change to the St. Helens zoning district map that constitutes a spot zoning is prohibited. A proposed change to the St. Helens comprehensive plan map that facilitates a spot zoning is prohibited.
- (2) Consideration may also be given to:
 - (a) Proof of a change in the neighborhood or community or a mistake or inconsistency in the comprehensive plan or implementing ordinance which is the subject of the application.

(1) (a) Discussion: This criterion requires analysis of the applicable statewide planning goals. The applicable goals in this case are Goal 1, Goal 2, Goal 9, and Goal 12.

Statewide Planning Goal 1: Citizen Involvement.

Goal 1 requires the development of a citizen involvement program that is widespread, allows two-way communication, provides for citizen involvement through all planning phases, and is understandable, responsive, and funded.

Generally, Goal 1 is satisfied when a local government follows the public involvement procedures set out in the statutes and in its acknowledged comprehensive plan and land use regulations.

The City's Development Code is consistent with State law with regards to notification requirements. Pursuant to SHMC 17.20.080 at least one public hearing before the Planning Commission and City Council is required. Legal notice in a newspaper of general circulation is required too. Notice of this proposal was sent to surrounding property owners within 300 feet of the subject properties. The City has met these requirements and notified DLCD of the proposal.

Statewide Planning Goal 2: Land Use Planning.

This goal requires that a land use planning process and policy framework be established as a basis for all decisions and actions relating to the use of land. All local governments and state agencies involved in the land use action must coordinate with each other. City, county, state and federal agency and special districts plans and actions related to land use must be consistent with the comprehensive plans of cities and counties and regional plans adopted under Oregon Revised Statutes (ORS) Chapter 268.

The City notified DLCD as required by state law prior to the public hearings to consider the proposal. There are no known federal or regional documents that apply to this proposal. Comprehensive Plan consistency is addressed further below. Given the inclusion of local, state, regional and federal documents, laws, participation and opportunity for feedback as applicable, Goal 2 is satisfied.

Statewide Planning Goal 9: Economic Development

This goal requires that cities and counties have enough land available to realize economic growth and development opportunities. Commercial and industrial development takes a variety of shapes and leads to economic activities that are vital to the health, welfare and prosperity of Oregon's citizens. To be ready for these opportunities, local governments perform Economic Opportunity Analyses based on a 20-year forecast of population and job growth.

This goal is satisfied when it can be shown that the proposal will not negatively affect industrial or other employment land, as such lands are catalysts to economic development. This zone change request is to re-zone a total of 9.84 acres from Light Industrial to General Commercial, both of which support economic development opportunities and employment lands.

According to the 2008 Economic Opportunities Analysis (Ord. 3101), St. Helens should have no shortage of industrial land over the next 20 years. Projections of future employment and industry demand indicate that St. Helens has a surplus of industrial zoned lands and parcels of at least 78 acres. Since 2008, the City has rezoned 25 acres of Heavy Industrial to the Riverfront District zoning district (Ord. No.3215) and approximately 1 acre from Light Industrial to Apartment Residential zoning (Ord. No. 3220). This means there is still a 52-acre industrial land surplus. In addition to a surplus of industrial zoned lands, the EOA also found that there is a shortage of approximately 10 acres of commercial lands. Given the surplus of industrial-zoned lands and a shortage of commercial lands, this proposal complies with Goal 9.

Statewide Planning Goal 12: Transportation

Goal 12 requires local governments to "provide and encourage a safe, convenient and economic transportation system." Goal 12 is implemented through DLCD's Transportation

Planning Rule (TPR), OAR 660, Division 12. The TPR requires that where an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation would significantly affect an existing or planned transportation facility, the local government shall put in place measures to assure that allowed land uses are consistent with the identified function, capacity, and performance standards of the facility.

A traffic impact analysis shall be submitted with a plan amendment or zone change application, as applicable, pursuant to Chapter 17.156 SHMC. See Section (d) for a more detailed discussion of the TPR and implementing ordinances. Based on Section (d) below, Goal 12 is met.

Finding: *Provided that the Planning Commission and City Council can find that the reduction of Light Industrial land will not negatively affect the available lands for industrial economic development,* this proposal complies with the relevant Statewide Planning Goals 1, 2, 9, and 12.

(1) (b) Discussion: This criterion requires analysis of any applicable federal or state statutes or guidelines applicable to this zone change.

Finding: There are no known applicable federal or state statutes or guidelines applicable to this zone change request.

(1) (c) Discussion: This criterion requires analysis of applicable comprehensive plan policies, procedures, appendices, and maps. The applicable Comprehensive Plan goals and policies are:

19.12.090 Light industrial category goals and policies.

(1) Goals. To provide a place for smaller and/or less intensive industrial activities where their service and transportation requirements can be met, and where their environmental effects will have minimal impact upon the community.

(2) Policies. It is the policy of the city of St. Helens to:

(a) Apply this category where light industrial concerns have become established and where vacant industrial sites have been set aside for this purpose.

(b) Encourage preserving such designated areas for light manufacturing, wholesaling, processing and similar operations by excluding unrelated uses which would reduce available land and restrict the growth and expansion of industry.

[...]

19.12.070 General commercial category goals and policies.

(1) Goals. To establish commercial areas which provide maximum service to the public and are properly integrated into the physical pattern of the city.

(2) Policies. It is the policy of the city of St. Helens to:

(a) Encourage new commercial development in and adjacent to existing, well-established business areas taking into account the following considerations:

(i) Making shopping more convenient for patrons;

(ii) Cutting down on street traffic;

(iii) Maximizing land through the joint use of vehicular access and parking at commercial centers; and

- (iv) Encouraging locations that enjoy good automobile access and still minimize traffic hazards.*
 - (b) Designate sufficient space for business so that predictable commercial growth can be accommodated and so that an adequate choice of sites exists.*
- [...]

It does not appear that the site has ever been developed previously with light industrial uses. Prior uses along Gable Road were detached single-family dwellings. The location along Gable Road is classified as a minor arterial roadway by the TSP, which means it is a highly trafficked, accessible, convenient location for commercial activity. The entrance to Wal-Mart, which is an already existing well-established business area is less than 1,000 feet away from this property.

Finding: The proposal complies with the General Commercial goals and policies to locate commercial areas which are convenient for patrons, have good auto access, and are already adjacent to existing, well-established business areas.

(1)(d) Discussion: This criterion requires an analysis of the implementing ordinances. The CCMH campus would be considered a “office” use which is an allowed use in the proposed GC zoning district. “Office” use is not an allowed use in the existing LI zoning district. With the proposed re-zoning, the land use of the property would become conforming.

Finding: This zone change furthers the implementing ordinances of the GC zoning district by classifying CCMH as a conforming “office” use.

SHMC 17.08.060 is also a relevant implementing ordinance.

SHMC 17.08.060 Transportation planning rule compliance

- (1) A proposed comprehensive plan amendment, zone change, or land use regulation change, shall be reviewed to determine whether it significantly affects a transportation facility, in accordance with OAR 660-012-0060 (the “Transportation Planning Rule” or “TPR”). “Significant” means the proposal would:
- (a) Change the functional classification of an existing or planned transportation facility
 - (b) Change standards implementing a functional classification system
 - (c) As measured at the end of the planning period identified in the adopted transportation system plan:
 - (i) Allow land uses or levels of development that would result in types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility
 - (ii) Reduce the performance of an existing or planned transportation facility below the minimum acceptable performance standard identified in the TSP
 - (iii) Worsen the performance of an existing or planned transportation facility that is otherwise projected to perform below the minimum acceptable performance standard identified in the TSP or comprehensive plan

TPR compliance requires a comparison of reasonable worst-case development of the site under existing and proposed zoning. One of the two subject properties was developed in 2004 with a 20,766 sq. ft. CCMH office building. The building and related parking occupy all of the developable area, with the remainder encumbered by wetlands and floodplain. This site is unlikely to be redeveloped with a different use within the planning horizon of the TSP.

To assist with the analysis for the second property, the applicant prepared a TPR analysis memo. The property is underdeveloped with a few smaller office buildings and related parking. It also includes some undevelopable area wetlands. The memo notes that the Oregon Health Authority is providing CCMH grant funding which requires that the facilities they develop remain in CCMH ownership for at least 20 years, which exceeds the forecasting requirements of the TPR. CCMH plans to develop the site with which support individuals with mental health and substance abuse issues who fall within the priority groups identified by OHA. The outright permitted uses of the proposed General Commercial zoning district (and the high traffic generators) like retail are not ones that CCMH has any intention of developing. Vehicle trip generation for the planned CCMH uses is anticipated to be low. Therefore, the applicant is proposing to apply a trip cap to future development, instead of conducting a full analysis of reasonable worst case uses in the GC zone.

The TPR memo concludes with a recommended trip cap of 1,107 daily trips for the site. This will ensure future development will not significantly impact the city or state transportation system, meeting the TPR requirements.

Finding: Provided a trip cap of 1,107 daily trips for the underdeveloped lot, the trips generated by the proposed zone change would not result in a significant impact to the city or the state transportation system.

Finding: There are no other applicable standards of any provision of this code or other applicable implementing ordinance to be reviewed for the purpose of this proposal not already addressed herein.

(1) (e) Discussion: This criterion requires that the proposed change is not a spot zone. The definition of “spot zoning” per Chapter 17.16 SHMC:

Rezoning of a lot or parcel of land to benefit an owner for a use incompatible with surrounding uses and not for the purpose or effect of furthering the comprehensive plan.

The proposal is to amend the Zoning Map from Light Industrial (LI) to General Commercial (GC) and the Comprehensive Plan Map from Light Industrial (LI) to General Commercial (GC). The property borders the following zones:

North: City LI and County Light Manufacturing (M-2)

South: City LI and County Light Manufacturing (M-2)

East: County Light Manufacturing (M-2)

West: City LI and City GC

Given that these properties abut GC to the west, and LI on the other 3 sides, there is not a conflict with the property abutting a highly incompatible zone (e.g., a residential zone). Looking at the zoning map for surrounding uses, the GC zone extends from US 30 a similar width as this proposal along Gable Road frontage. This zone change continues the trend of GC lands along Gable Road, which is a higher classified roadway (minor arterial) according to the TSP. Higher classified roadways typically warrant commercial uses, given the increased traffic.

Finding: This proposal is not a “spot zone” per Chapter 17.16 SHMC.



CONCLUSION & RECOMMENDATION

Based upon the facts and findings herein, staff recommends approval of this Comprehensive Plan Map and Zoning District Map Change with the recommended condition:

Any development and/or redevelopment of the site shall not trigger more than 1,107 daily trips within the TSP planning horizon of 2031 (as adopted in 2011 with Ord. No. 3150).

Attachments: Aerial Map
Zoning Map
Comp Plan Map
CCMH TPR Analysis dated July 25, 2023 (19 pages)
Applicant Narrative (9 pages)

CPZA.1.23 AERIAL

-  Subject Property
-  Taxlots



CPZA.1.23 ZONING

 Subject Property

 Building

Zoning

 General Commercial (GC)

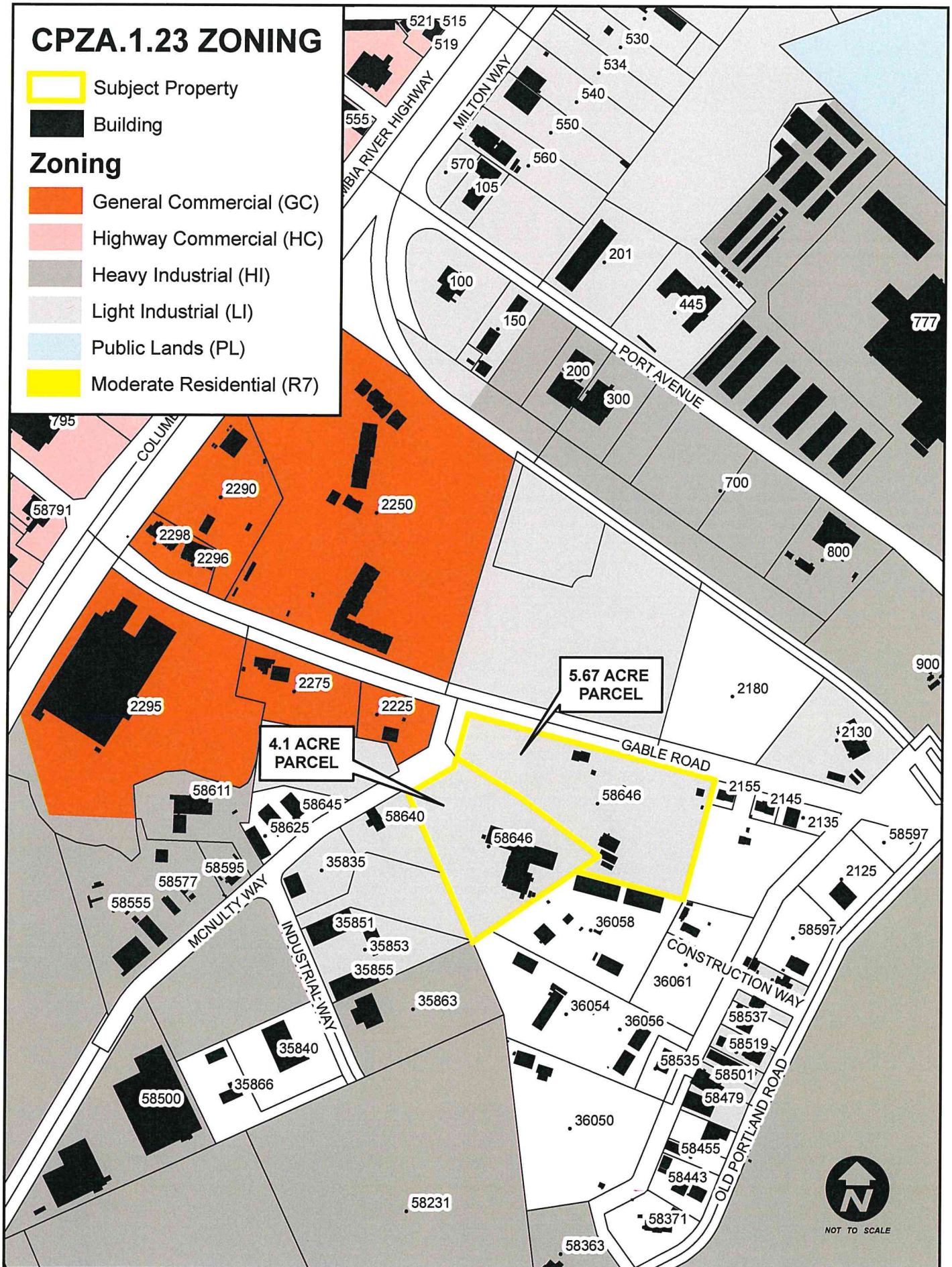
 Highway Commercial (HC)

 Heavy Industrial (HI)

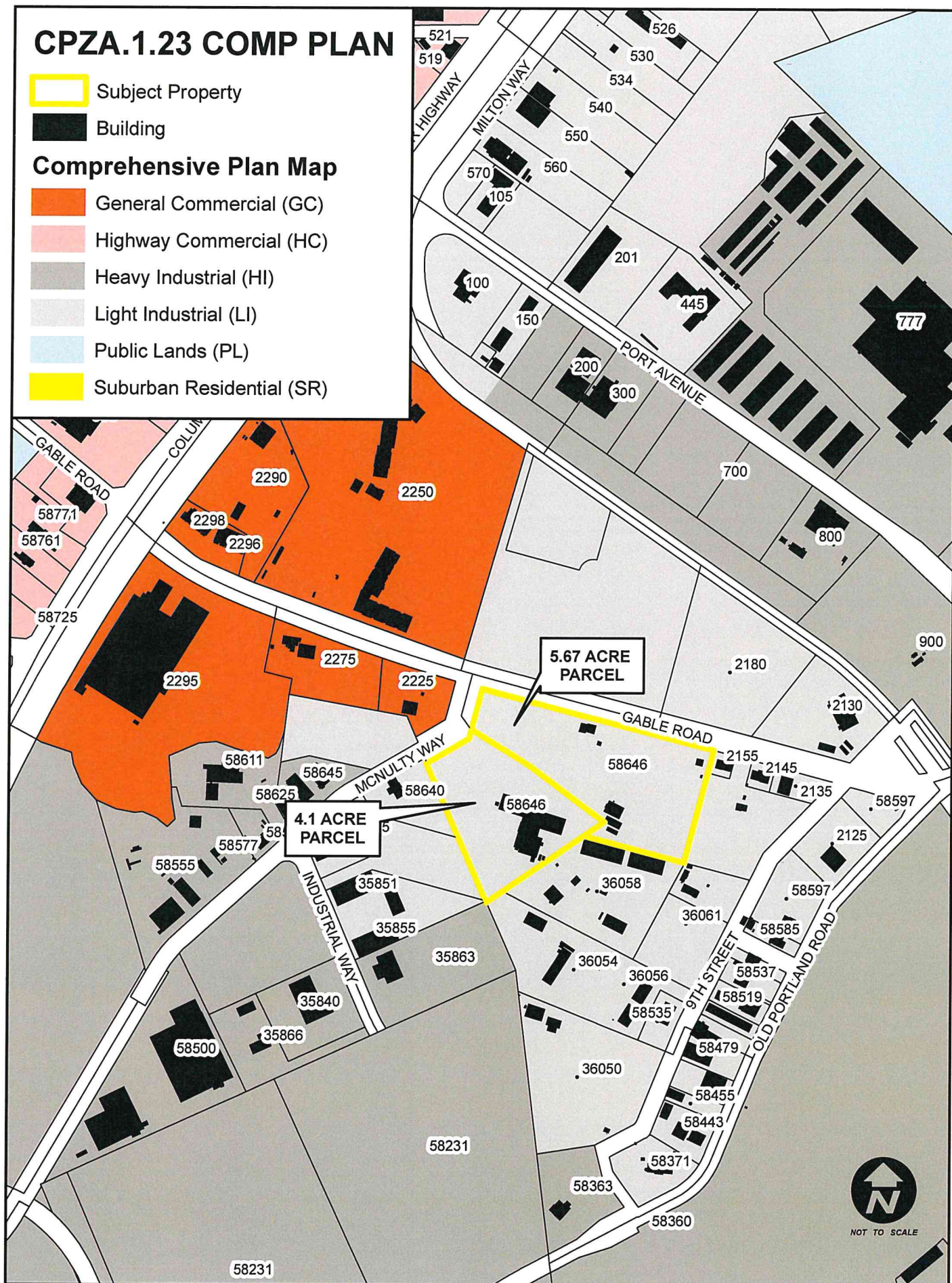
 Light Industrial (LI)

 Public Lands (PL)

 Moderate Residential (R7)



Suburban Residential (SR)



Memorandum

To: Jenny Dimsho, City of St. Helens
Oregon Department of Transportation, Development Review

Copy: Al Peterson, AKAAN

From: Jennifer Danziger, PE

Date: July 25, 2023

Subject: CCMH Transportation Planning Rule Analysis



RENEWS: 12/31/2023

Introduction

This memorandum presents the Transportation Planning Rule (TPR) analysis for the proposed rezoning of two parcels of land totaling approximately 9.84 acres from Light Industrial (LI) to General Commercial (GC). Both parcels are owned by Columbia Community Mental Health (CCMH), which currently occupies part of the site. The purpose of the rezoning is to allow future development in support of expanding the services offered by CCMH.

Site Description

The two parcels proposed for rezoning are located south of Gable Road and east of McNulty Way on Tax Map 4108-AD Lot 200 and Tax Map 4109-BB Tax Lot 300, as shown in Figure 1.



Figure 1: Vicinity Map

Tax Lot 200

Tax Lot 200 has a total area of 4.17 acres with an address of 58646 McNulty Way. It was developed nearly 20 years ago with a one-story, 20,766-square foot (SF) office building. This building, Creekside Center, currently serves as the main office of CCMH. The building and parking lot occupy the developable portion of the site, the remainder is wetlands and is located within the FEMA Floodplain Hazard Zones (see Figure 2).

Existing zoning is Light Industrial (LI), as shown in Figure 3. The abutting gray areas are currently outside the City Limits but within the Urban Growth Boundary (UGB) and are also designated Light Industrial (M-2) under Columbia County zoning. Along Gable Road between McNulty Way and the Columbia River Highway (US 30), the zoning is General Commercial (GC).

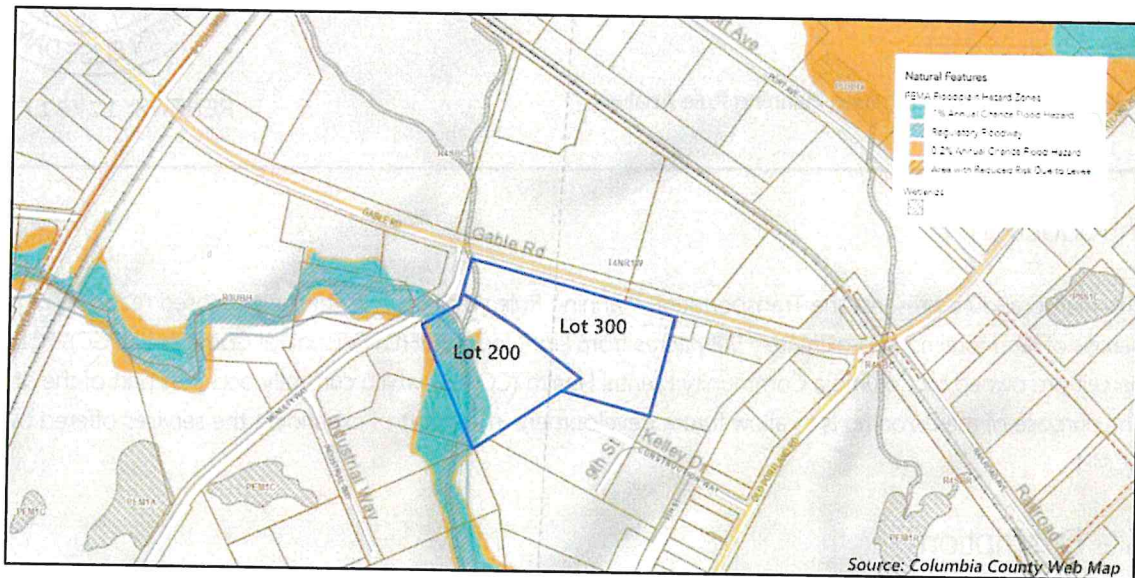


Figure 2: Natural Features

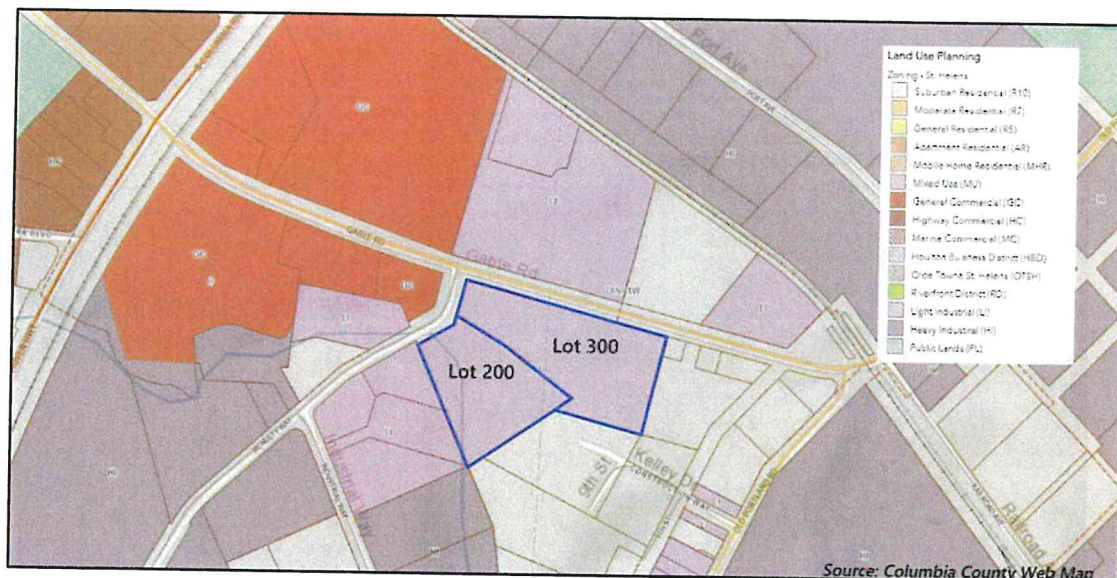


Figure 3: City of St. Helens Zoning



Tax Lot 300

Tax Lot 300 has a total area of 5.67 acres with an address of 2195 Gable Road. The property appears to have originally been developed with two residences which are now under CCMH ownership. One building has been torn down while the other is being converted to a crisis stabilization center. Three small office buildings supporting the CCMH main facility on Tax Lot 200 have been constructed with a total gross floor area of 4,505 SF. The existing buildings occupy only a small portion of the site. Wetlands cross the western edge of the parcel (see Figure 2). Existing zoning is Light Industrial (LI), as shown in Figure 3 with abutting zoning as described for Tax Lot 200.

TPR Analysis Assumptions

The TPR 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

Attachment A of this memorandum includes the St. Helens Municipal Code (SHMC) Section 17.32.130, which provides the purpose of the LI zoning and list the outright permitted and conditional uses allowed in the LI zone. In considering development scenarios for the TPR analysis, only permitted uses in the zone were considered. Definitions of the land uses based on the Institute of Transportation Engineers (ITE) *Trip Generation Manual*¹ are provided for each land use.

Tax Lot 200

Tax Lot 200 is currently developed with a one-story, 20,766-SF office building. Although an office building may not be the highest traffic generator that could possibly be constructed, the 4.17-acre site is unlikely to be redeveloped to an alternate use. Therefore, the trip generation under both the existing and proposed zoning scenarios is the same for this parcel and no trip generation is necessary for the zone change.

Tax Lot 300

The existing buildings currently located on the 5.67-acre parcel do not represent a reasonable worst-case development scenario under either the existing or proposed zoning. Therefore, development scenarios need to be created for this parcel. The area considered for the development scenarios is 5.34 acres, a 0.33-acre reduction from the total parcel size to allow for a 50-foot buffer from the edge of the identified wetlands along the western boundary of the tax lot.

The following three development scenarios are considered as reasonable worst case under existing zoning:

- 110,000 SF of General Light Industrial – Per ITE, “a light industrial facility is a free-standing facility devoted to a single use. The facility has an emphasis on activities other than manufacturing and typically has minimal office space.”

¹ Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 11th Edition, 2021.



- 100,000 SF of Manufacturing – Per ITE, “a manufacturing facility is an area where the primary activity is the conversion of raw materials or parts into finished products. Size and type of activity may vary substantially from one facility to another. In addition to the actual production of goods, a manufacturing facility typically has an office and may provide space for warehouse, research, and associated functions.”
- 30,000 SF of Building Materials and Lumber Store – Per ITE, “a building materials and lumber store is a free-standing building that sells hardware, building materials, and lumber. The lumber may be stored in the main building, yard, or storage shed.” This use generally has large lumber and materials storage areas outside of the building, thus the relatively small building footprint.

The assumptions used to calculate these scenarios are summarized in Attachment C.

To estimate trips that will be generated by the redevelopment, trip rates from the *Trip Generation Manual*² were used based on the building square footage (SF). The trip generation estimates are summarized in Table 1.

Table 1: Trip Generation – Existing Zoning

Land Use Assumption (ITE Code)	Intensity	Morning Peak Hour			Evening Peak Hour			Weekday Trips
		In	Out	Total	In	Out	Total	
General Light Industrial (110)	110,000 SF	71	10	81	10	62	72	536
Manufacturing (140)	100,000 SF	52	16	68	23	51	74	476
Building Materials & Lumber Store (812)	30,000 SF	30	18	48	31	37	68	512

The overall highest generator is a general light industrial building at 110,000 SF with 81 morning peak hour, 72 evening peak hour, and 536 daily peak hour trips.

Proposed Zoning

The proposed zoning for both tax lots is General Commercial (GC), similar to other zoning along the western section of Gable Road. Attachment B includes SHMC Section 17.32.110, which provides the purpose of the GC zoning and list the outright permitted and conditional uses allowed in the GC zone.

Tax Lot 200

As noted previously, Tax Lot 200 is currently developed with a one-story, 20,766-SF office building that is unlikely to be redeveloped to an alternate use. Therefore, the trip generation under both the existing and proposed zoning scenarios is the same for this parcel and no trip generation increase will occur with the zone change.

² Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 11th Edition, 2021.



Tax Lot 300

Rather than evaluating worst-case scenarios under the proposed zoning, a trip cap is proposed for Tax Lot 300. The reasons for this approach include:

- The grant funding that CCMH has received from the Oregon Health Authority (OHA) to develop the site comes with an expectation that the facilities will be utilized by CCMH for at least 20 years, which exceeds the minimum forecasts requirements established in the TPR.
- The outright, permitted uses allowed under the GC zoning are largely unrelated to the uses that CCMH has planned. CCMH has no intention of developing the site with retail uses and any planned office uses on the site will be limited in size and constructed to augment existing offices and the large facility on the adjacent parcel.
- The uses that CCMH has planned for the site are part of a continuum of care for individuals with mental health and substance abuse issues who fall within the priority groups identified by OHA. The individuals who meet these criteria are unlikely to own vehicles or be traveling for employment, shopping, school, or other primary travel behaviors that constitute most trip-making activity. Vehicle trip generation for the planned CCMH uses is anticipated to be low.

To establish a trip cap recommendation for Tax Lot 300, the criteria in Oregon Highway Plan (OHP) Action 1F.5 was considered. The relevant section is 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.*

To convert that maximum increase at study area intersections to a trip cap for the tax lot, an approximate trip distribution is needed. A distribution of site trips to/from the project site considers the locations of likely trip origins/destinations (primarily residences for both office and retail) and the locations of major transportation facilities in the site vicinity. An additional consideration was Google Maps estimated travel times along various routes to/from the site.

The recommended distribution is shown in Figure 4 and summarized below:

- Approximately 30% of primary site trips to/from the east on Gable Road
- Approximately 30% of site trips to/from the north on Columbia River Highway (US 30)
- Approximately 20% of site trips to/from the west on Gable Road
- Approximately 15% of site trips to/from the south on McNulty Way to Columbia River Highway (US 30)
- Approximately 5% of site trips to/from the south on Columbia River Highway (US 30) via Gable Road.





Figure 4: Trip Distribution

To determine the trip cap, the 400 daily trip threshold was applied to the intersection with the greatest traffic volume impact, which is Gable Road & McNulty Way. This City intersection is estimated to carry approximately 70 percent of the site traffic. If the trip increase through the intersection is limited to 400 daily trips, then the increase in trips for the site would be limited to 571 daily trips (i.e., 400 trips / 70 percent) over the existing zoning estimate of 536 daily trips. The result would be a trip cap of 1,107 daily trips for Tax Lot 300.

Transportation Planning Rule

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.

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. If a local government is evaluating a performance standard based on projected levels of motor vehicle traffic, then the results must be 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) are not triggered since the proposed zone change will not impact or 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 intersections with the greatest potential for impacts are Gable Road & McNulty Way and Columbia River Highway (US 30) & Gable Road, which is part of the state system. By assuming that Tax Lot 200 will remain unchanged and capping the trip generation Oregon for Tax Lot 300, the trips generated by the proposed zone change would not “significantly affect” traffic per OHP Action 1F.5. Therefore, the proposed zone change does not trigger Subsection (c).



Summary and Recommendations

While the proposed zoning could potentially generate more traffic than the existing zoning, by assuming that Tax Lot 200 will remain unchanged and capping the trip generation Oregon for Tax Lot 300, the trips generated by the proposed zone change would not result in a finding of significant affect. Therefore, no modifications to the City's TSP are needed and the conditions of TPR are satisfied.

The recommended trip cap for Tax Lot 300 is 1,107 daily trips. This cap would allow an increase of 571 daily trips over the existing zoning estimate of 536 daily trips. Based on the anticipate trip distribution for the site, no more than 400 daily trips would be added to any intersection on the state highway or City of St. Helens transportation system, which would satisfy the criteria in Oregon Highway Plan (OHP) Action 1F.5.



Attachment A

Light Industrial Zoning Definitions



17.32.130 Light industrial – LI.

(1) Purpose. The light industrial or LI zone is intended to provide appropriate locations for general industrial use including light manufacturing and related activities with few, if any, nuisance characteristics such as noise, glare, and smoke. It is to permit manufacturing, processing, assembling, packaging or treatment of products from previously prepared materials and to discourage residential use and limit commercial use.

(2) Uses Permitted Outright. In the LI zone the following buildings and uses are permitted after compliance with the provisions of this section and others of this code:

- (a) Agricultural supplies/sales, machinery sales and repairs but not slaughterhouses or tanneries.
- (b) Animal sales and services: kennels, veterinary (small animals), and veterinary (large animals).
- (c) Auction sales, services and repairs.
- (d) Boat repairs.
- (e) Building maintenance services.
- (f) Building material sales including outdoor storage.
- (g) Commercial gasoline stations.
- (h) Equipment (light and heavy) sales, storage, repair and rentals.
- (i) Laboratories and research services.
- (j) Manufacturing, repairing, compounding, research, assembly, fabricating, or processing activities of previously prepared materials and without off-site impacts.
- (k) Mini storage and storage site.
- (l) Motor vehicle sales, service, repair, and painting.
- (m) Nurseries, greenhouse operations and sales.
- (n) Parking lots, private or public.
- (o) Public facility, minor.
- (p) Transmitting and/or receiving towers with or without broadcast facilities.
- (q) Utility distribution plants and service yards.
- (r) Vehicle wash operations.
- (s) Warehousing, enclosed.
- (t) Wholesale trade.

(3) Conditional Uses. In the LI zone, in addition to the buildings and uses permitted outright, a conditional use permit can be granted for the following buildings and uses:

- (a) Bar.
- (b) Child care facilities.
- (c) Concrete mixing (concrete batching plant).



- (d) Drive-in theater.
 - (e) Dwelling for caretaker or superintendent which is located on the same site with the permitted industrial use and is occupied exclusively by a caretaker or superintendent of the industrial use and family (same applies to a kennel).
 - (f) Eating and drinking establishments.
 - (g) Entertainment, adult.
 - (h) Industrial park to combine light manufacturing, office and complementary related commercial uses to include such activities as postal services, veterinary services, communication services, construction sales, business support services, financial services, insurance services, real estate services, laundry services, medical/dental services, sports and health services, professional and administrative offices, convenience sales, personal services, eating and drinking establishments and such.
 - (i) Manufacturing, repairing, compounding, research, assembly, fabricating, processing or packing of resource materials with some off-site impacts.
 - (j) Public and private recreational and amusement facilities.
 - (k) Public facilities, major.
 - (l) Public parks.
 - (m) Public safety and support facilities.
 - (n) Temporary asphalt batching (six-month maximum).
 - (o) Travel trailer parks.
 - (p) Wrecking and junkyards.
- (4) Standards.
- (a) The standards for the LI zone shall be determined by the proximity to residential zones and the anticipated off-site impacts.
 - (b) The maximum height within 100 feet of any residential zone shall be 35 feet.
- (5) All chapters of the Development Code apply. (Ord. 3215 § 4 (Att. D), 2017; Ord. 2875 § 1.080.130, 2003)



Attachment B

General Commercial Zoning Definitions



17.32.110 General commercial – GC.

(1) Purpose. The GC zone is intended to provide for a broad range of commercial operations and services required for the proper and convenient functioning of commercial activities serving the general public locally and regionally but not specifically the traveling motorists.

(2) Uses Permitted Outright. In a GC zone, the following uses are permitted outright subject to the provisions of this code and especially the chapter on site development review (Chapter 17.96 SHMC):

- (a) Animal sales and services: grooming, kennels, retail, veterinary (small animals), and veterinary (large animals).
- (b) Car washes.
- (c) Cultural and library services.
- (d) Dwellings above permitted uses (use AR standards).
- (e) Eating and drinking establishments.
- (f) Equipment (small) sales, rental and repairs.
- (g) Financial institutions.
- (h) Hardware store, without outdoor storage.
- (i) Historic structures (as listed in the comprehensive plan).
- (j) Home occupation (per Chapter 17.120 SHMC).
- (k) Hotels and motels.
- (l) Offices – all.
- (m) Personal and business services such as barber shops, beauty shops, tailors, laundries, printing, and locksmiths.
- (n) Plumbing, HVAC, electrical and paint sales and service, without outdoor storage.
- (o) Produce stands.
- (p) Public facility, minor.
- (q) Repair and maintenance of permitted retail products.
- (r) Retail sales establishments, not specifically catering to motorists.
- (s) Studios.
- (t) Theaters, except drive-ins.

(3) Conditional Uses. In the GC zone, the following conditional uses may be permitted upon application, subject to provision of Chapter 17.100 SHMC and other relevant sections of this code:

- (a) Amusement services.
- (b) Bar.
- (c) Bed and breakfast facilities, homestay, and boarding house.
- (d) Broadcast facilities without dishes over 36 inches or transmitter/receiver towers.
- (e) Bus and train stations/terminals.



- (f) Businesses with outdoor storage (those businesses permitted in subsection (2) of this section).
 - (g) Child care facility/day nursery.
 - (h) Congregate housing.
 - (i) Drive-up businesses and services (including those associated with food/restaurants).
 - (j) Funeral homes.
 - (k) Hospitals and senior or convalescent care facilities.
 - (l) Laundromats and dry cleaners.
 - (m) Lodge, fraternal and civic assembly.
 - (n) Lodging facilities or rooming house.
 - (o) Marijuana retailer and/or medical marijuana dispensary.
 - (p) Multidwelling units.
 - (q) Nurseries and greenhouses.
 - (r) Parking lots.
 - (s) Parks, public and private.
 - (t) Pawn shops.
 - (u) Public and private schools.
 - (v) Public facilities, major.
 - (w) Recreation facilities.
 - (x) Religious assembly, including cemeteries.
 - (y) Residential facility.
 - (z) Shopping centers and plazas.
 - (aa) Travel trailer parks.
 - (bb) Vehicle repair, service, and sales.
- (4) Standards. In the GC zone the following standards shall apply:
- (a) The maximum building height shall be 45 feet, except as required in SHMC 17.68.040.
 - (b) Outdoor storage abutting or facing a lot in a residential zone shall comply with Chapter 17.72 SHMC.
 - (c) The maximum lot coverage including all impervious surfaces shall be 90 percent.
 - (d) Multidwelling units must comply with AR standards and other applicable sections of this code.
 - (e) The minimum landscaping shall be 10 percent of the gross land area associated with the use.
- (5) All chapters of the Development Code apply. (Ord. 3232 § 2 (Att. A), 2018; Ord. 3215 § 4 (Att. D), 2017; Ord. 3190 § 2 (Att. A), 2015; Ord. 3032 § 1(4), 2007; Ord. 2875 § 1.080.110, 2003)



Attachment C

Existing Zoning

Development Scenario Calculations

Trip Generation Calculations



Lot 00300		
5.67	acres	Total
0.33	acres	Wetlands
5.34	acres	Developable
232,610	SF	

Existing Zoning Use: Manufacturing

Notes

Landscaping & Buffering Assumption:	30%	
Parking Requirement per Code:	1 per emp of largest shift	17.80.030 (4)(c)
Parking Space Area Assumption (including Loading Areas):	500 SF	
Employee Density Assumption:	2 employees/KSF	Rough ITE ratios for LU 140
% of Employees in Largest Shift:	60%	
Number of Floors in Building:	1	

Developable Area:	162,827 SF
Estimated Building Size:	100,000 SF
Estimated Number of Employees:	200
Estimated Building Footprint:	100,000
Estimated Parking Spaces:	120
Estimated Parking Area:	60,000 SF
Estimated Total Development Footprint:	160,000 SF
Lot Coverage:	43%

Existing Zoning Use: General Light Industrial

Notes

Landscaping & Buffering Assumption:	30%	
Parking Requirement per Code:	1 per emp of largest shift	17.80.030 (4)(c)
Parking Space Area Assumption (including Loading Areas):	500 SF	
Employee Density Assumption:	1.5 employees/KSF	Rough ITE ratios for LU 110
% of Employees in Largest Shift:	60%	
Number of Floors in Building:	1	

Developable Area:	162,827 SF
Estimated Building Size:	110,000 SF
Estimated Number of Employees:	165
Estimated Building Footprint:	110,000
Estimated Parking Spaces:	99
Estimated Parking Area:	49,500 SF
Estimated Total Development Footprint:	159,500 SF
Lot Coverage:	47%

Existing Zoning Use: Building Materials Sales

Notes

Landscaping & Buffering Assumption:	30%	
Parking Requirement per Code:	2.500 per KSF	17.80.030 (3)(u)
Parking Space Area Assumption (including Loading Areas):	350 SF	
Number of Floors in Building:	1	

Developable Area:	162,827 SF	
Estimated Building Size:	30,000 SF	Based on similar sites for Parr Lumber
Estimated Building Footprint:	30,000	
Estimated Parking Area:	26,250 SF	
Estimated Total Development Footprint:	56,250 SF	
Lot Coverage:	13%	



TRIP GENERATION CALCULATIONS

Source: Trip Generation Manual, 11th Edition

Land Use: General Light Industrial

Land Use Code: 110

Land Use Subcategory: All Sites

Setting/Location: General Urban/Suburban

Variable: 1000 SF GFA

Trip Type: Vehicle

Formula Type: Rate

Variable Quantity: 110

AM PEAK HOUR

Trip Rate: 0.74

	Enter	Exit	Total
Directional Split	88%	12%	
Trip Ends	71	10	81

PM PEAK HOUR

Trip Rate: 0.65

	Enter	Exit	Total
Directional Split	14%	86%	
Trip Ends	10	62	72

WEEKDAY

Trip Rate: 4.87

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	268	268	536

SATURDAY

Trip Rate: 0.69

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	38	38	76

Caution: Small Sample Size



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

Land Use: Manufacturing
Land Use Code: 140
Land Use Subcategory: All Sites
Setting/Location: General Urban/Suburban
Variable: 1000 SF GFA
Trip Type: Vehicle
Formula Type: Rate
Variable Quantity: 100

AM PEAK HOUR

Trip Rate: 0.68

	Enter	Exit	Total
Directional Split	76%	24%	
Trip Ends	52	16	68

PM PEAK HOUR

Trip Rate: 0.74

	Enter	Exit	Total
Directional Split	31%	69%	
Trip Ends	23	51	74

WEEKDAY

Trip Rate: 4.75

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	238	238	476

SATURDAY

Trip Rate: 1.49

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	75	75	150



TRIP GENERATION CALCULATIONS

Source: Trip Generation Manual, 11th Edition

Land Use: Building Materials and Lumber Store

Land Use Code: 812

Land Use Subcategory: All Sites

Setting/Location: General Urban/Suburban

Variable: 1000 SF GFA

Trip Type: Vehicle

Formula Type: Rate

Variable Quantity: **30**

AM PEAK HOUR

Trip Rate: 1.59

	Enter	Exit	Total
Directional Split	62%	38%	
Trip Ends	30	18	48

PM PEAK HOUR

Trip Rate: 2.25

	Enter	Exit	Total
Directional Split	46%	54%	
Trip Ends	31	37	68

WEEKDAY

Trip Rate: 17.05

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	256	256	512

SATURDAY

Trip Rate: 51.61

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	774	774	1,548

**Zone Change Application:
Re-zone to General Commercial - GC
(from Light Commercial-LC)**

Property Owner:

Columbia Community Mental Health
2195 Gable Road / PO Box 1234,
St Helens, OR 97051

Subject Properties:

Tax Lot 4108-AD-0200 – 58646 McNulty Way, St Helens
Tax Lot 4109-BB-0300 – 2195 Gable Road, St Helens

Proposal:

Under the St Helens Municipal Code (SHMC) the properties are currently zoned LI – Light Industrial, CCMH proposes to rezone the properties as GC-General Commercial.

Summary:

Columbia Community Mental Health (CCMH) provides mental health and recovery services to Columbia County. CCMH's main facility, constructed in 2004, is situated on Tax Lot 4108-AD-0200. On Tax Lot 4109-BB-0300, are other CCMH buildings, containing other aspects of CCMH mental health services.

Per the SHMC all the occupancies in the CCMH buildings, fall under the category of Offices (mental health staff offices, consulting rooms, support staff offices and other related uses.)

Under the SSMC the Light Industrial zone (current zoning) does not permit Offices outright. Offices are only allowed as a conditional use when incorporated into an Industrial Park.

CCMH is out of space in its current buildings and plans for future facilities. All of that planned growth will be of the same type of occupancy, offices & consulting rooms for mental health staff and related services.

Current zoning will make future growth cumbersome because every new structure will require either a conditional use permit or a variance. Changing the zoning to General Commercial makes much more sense

because it will put the property into a zone that allows offices outright, the way the property owner intends to use the property.

From a practical standpoint, the adjacent property to the west, Tax Lot 4108-AD-00500, is already zoned as General Commercial, as are other adjacent properties: Walmart, the shopping area where Mod Pizza and Starbucks are located, and the new Broadleaf housing project north of Gable Road. This zone change simply expands the General Commercial zone farther to the east, and can be argued, will be the trend in the future along Gable Road.

Applicable Criteria

Note: the below discussion addresses the applicable sections of the St Helens Municipal Code and Comprehensive Plan (hereafter referred to as SHMC and "comp. plan") as we understand them. Should we need to address additional sections we are more than happy to do so.

17.20.120 The standards of the decision.

(1) The recommendation by the commission and the decision by the council shall be based on consideration of the following factors:

(a) The statewide planning goals and guidelines adopted under ORS Chapter 197, including compliance with the Transportation Planning Rule, as described in SHMC 17.08.060;

ORS 197 applies to procedural implementation of comprehensive plans and zoning ordinances implemented by cities and counties. To the best of our knowledge these procedures are being implemented by the City of St Helens as prescribed by ORS 197. We know of no section of ORS 197 that specifically applies to this application, however we would be happy to address it should it be brought to our attention (see note above).

(b) Any federal or state statutes or guidelines found applicable;

None to our knowledge however but we can address any that are pointed out to us (see note above).

(c) The applicable comprehensive plan policies, procedures, appendices and maps;

Addressed below.

(d) The applicable provisions of the implementing ordinances; and
Not applicable at this time. The implementing ordinances are the chapters of the Zoning Code and are applicable at the time of development.

(e) A proposed change to the St. Helens zoning district map that constitutes a spot zoning is prohibited. A proposed change to the St. Helens comprehensive plan map that facilitates a spot zoning is prohibited.

Not applicable, the adjoining properties are already zoned general commercial, this is an expansion of an existing zone, and can be argued, will be the trend in the future along Gable Road.

(2) Consideration may also be given to:

(a) Proof of a change in the neighborhood or community or a mistake or inconsistency in the comprehensive plan or implementing ordinance which is the subject of the application.

Not applicable.

Comprehensive Plan Policies

Note: the below discussion addresses the applicable sections of the St Helens Compressive Plan (hereafter referred to as "comp. plan") as we understand them. Should the city need us to address additional sections we are more than happy to do.

Land Use Goals and Policies SHMC 19.12.

19.12.010 Urban growth boundary goals and policies.

Not applicable: Property is already located well within the urban growth boundary and already annexed into the city limits.

19.12.020 General residential category goals and policies.

Not applicable, property is not a residential zone, nor adjacent to a residential zone.

19.12.030 Suburban residential category goals and policies.

Not applicable

19.12.040 Mobile home residential category goals and policies.

Not applicable

19.12.050 Unincorporated general and multifamily residential category goals and policies (UGR and UGMFR).

Not applicable

19.12.060 Rural suburban unincorporated residential category goals and policies.

Not applicable.

19.12.070 General commercial category goals and policies.

(1) Goals. To establish commercial areas which provide maximum service to the public and are properly integrated into the physical pattern of the city.

Columbia Community Mental Health (CCMH) has been providing mental health and recovery services to St Helens and Columbia County at this location since 2004. The intent of this zone change is to zone the property as it is actually being used and to eliminate regulatory hurdles to continue to use and develop the property. The property will be used as offices and other accessory spaces related to CCMH's mental health mission.

(2) Policies. It is the policy of the city of St. Helens to:

(a) Encourage new commercial development in and adjacent to existing, well-established business areas considering the following considerations:

The property is adjacent to other properties that are already zoned as General Commercial, this is a natural addition to the existing General Commercial Zone.

(i) Making shopping more convenient for patrons;

Not specifically applicable, however CCMH campus is adjacent to shopping areas (Safeway, Walmart, Dollar Tree), employees of CCMH can shop at the conveniently located adjacent shopping areas.

(ii) Cutting down on street traffic;

This property is within walking distance of the adjacent shopping areas, and adjacent new housing development currently under construction. CCMH patrons can easily walk to and from CCMH.

- (iii) *Maximizing land through the joint use of vehicular access and parking at commercial centers; and*

CCMH was originally constructed on tax lot Tax Lot 4108-AD-0200, CCMH subsequently bought the adjacent Tax Lot 4109-BB-0300 to expand its services. CCMH properties like are already like a campus with multiple buildings that share internal vehicular access drives. The two properties already have driveway access on McNulty Road and a driveway access on Gable Road. The intent is to continue to share these vehicular access points as well as construct internal pedestrian pathways.

- (iv) *Encouraging locations that enjoy good automobile access and still minimize traffic hazards.*

This property already has good vehicular access on Gable Road and McNulty Road.

- (b) *Designate sufficient space for business so that predictable commercial growth can be accommodated and so that an adequate choice of sites exists.*

Rezoning this property fulfills this goal. The property owner intends to expand the services on the property by constructing additional buildings. The rezone makes the further development of the property predictable, by making the current use allowed outright rather than subject to conditional use or variance procedures. By zoning the property as it is actually being used will eliminate the regulatory hurdles and simplify and streamline the land use approval process for expanding what is already occurring on the property.

- (c) *Ensure that all commercial enterprises maintain sufficient off-street parking to accommodate their patrons, workers and loading requirements.*

This goal is a requirement under the zoning ordinance. CCMH intends to provide parking on the property and will be subject to the parking requirements of the zoning code when development occurs.

- (d) *Emphasize and support existing town centers as business places. When areas are developed adjacent or next to existing town centers, ensure that the new development is compatible with and will complement existing development.*

Rezoning this property fulfills this goal. CCMH's current development, and future plans, complement the existing retail and housing development.

CCMH's services are close to locations where their clients, and future clients live and shop, making the location convenient for CCMH clients.

(e) Improve the general appearance, safety and convenience of commercial areas by encouraging greater attention to the design of buildings, parking, vehicle and pedestrian circulation, and landscaping through a site design review procedure.

Site Design Review is a requirement of the zoning code, this paragraph is not applicable at this time. CCMH realizes that any development of the property will have to go through the site design review process. Rezoning the property to be compatible with CCMH's current and future use will eliminate the additional regulatory encumbrances of variances and conditional use procedures.

(f) Preserve areas for business use by limiting incompatible uses within them.

The intent of this application is to re-zone the property to a designation that coincides with how the property is actually being used, and how adjacent properties are already designated.

The property contains a building that was constructed as an office building for mental health services, however the property is zoned Light Industrial. Under the SSMC the Light Industrial zone (current zoning) does not permit Offices outright. Offices are only allowed as a conditional use when incorporated into an Industrial Park. It could be argued that the property is part of an industrial park because it is across the creek from the McNulty Creek Industrial Park. However, since it is not an allowed outright use, continued development as mental health offices will always be encumbered by conditional use or variance procedures. By zoning the property as it is actually being used will eliminate the regulatory hurdles and simplify and streamline the land use approval process for expanding what is already occurring on the property.

(g) Encourage a variety of retail shopping activities to concentrate in the core commercial areas to enhance their attractiveness for a broad range of shoppers; additionally, encourage in this area the development of public spaces such as broad sidewalks, small squares, etc., to facilitate easy, safe, pleasant pedestrian circulation. When located along the waterfront, such public spaces shall facilitate public access to and enjoyment of the Columbia River and Multnomah Channel to the maximum extent possible.

Retail not applicable. CCMH already considers their property a campus and intends to continue to develop it to be a campus like setting, keeping the wooded and open areas as much as possible, build buildings at practical locations and develop pleasant pedestrian walking paths between the various buildings and parking areas.

(h) Encourage in-filling of vacant lands within commercial areas.

Rezoning this property fulfills this goal. The property owner intends to expand the services on the property by constructing additional buildings and create a CCMH campus.

(i) Encourage redevelopment of waterfront property that is not designated industrial and can be integrated with existing nearby commercial or mixed-use areas. (Ord. 3215 § 4 (Att. D), 2017; Ord. 2980 § 2, 2006)

Not applicable.

Current Zoning Designation Goals and Policies

19.12.090 Light industrial category goals and policies.

(1) Goals. To provide a place for smaller and/or less intensive industrial activities where their service and transportation requirements can be met, and where their environmental effects will have minimal impact upon the community.

To our knowledge the property has never been used for light industrial purposes, it was first developed in 2004/05 as CCMH's office building. Since then CCMH has continued to grow. CCMH purchased adjoining properties, the residential buildings on those properties have been converted to offices, as well as modular office units brought in for the same purpose. The property will continue to grow as CCMH's campus, the Light Industrial designation does not make sense.

(2) Policies. It is the policy of the city of St. Helens to:

(a) Apply this category where light industrial concerns have become established and where vacant industrial sites have been set aside for this purpose.

No light industrial concerns are established on this property.

(b) Encourage preserving such designated areas for light manufacturing, wholesaling, processing and similar operations by excluding unrelated uses which would reduce available land and restrict the growth and expansion of industry.

If this goal were to be implemented CCMH would either be forced to relocate (unconstitutional) or face regulatory hurdles to use their property as they have been using it ever since they built their main facility on the property.

(c) Ensure that light industry operations have adequate space with respect to employee and truck parking, loading, maneuvering and storage.

The property was originally developed 2004/05 as CCMH offices. The existing employee parking and drive aisles were not designed to accommodate tractor-trailer vehicles normally associated with industrial properties. Developing the property as Light Industrial would require a complete reconfiguration of the parking areas and driveways.

(d) Follow a site design review process for light industrial activity to ensure proper setbacks as well as screening and buffering, particularly for unsightly areas which can be viewed from arterials or from adjoining residential areas; in contemplating the setbacks, consideration should be given to the effect of the activity on significant fish and wildlife areas. (Ord. 2980 § 2, 2006)

The zoning code requires site design review and will be followed at the time of development. Currently the property is used for commercial uses, not light industrial uses, there are no adjoining residential properties. McNulty Creek is to the south of the already developed Tax Lot 4108-AD-0200, which was developed with appropriate setback and riparian zone protecting the creek. Future development will be farther north and away from McNulty Creek well away from the creek and riparian zone.

Sections 19.12.100, 19.12.110, 19.12.120, 19.12.130
Not applicable

Section 19.362.10 Riverfront Connector Plan

CCMH property is located on Gable Road which is part of the Riverfront Connector Plan. CCMH acknowledges the Riverfront Connector Plan.