

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

**DATE:** October 10, 2023  
**TO:** City Council  
**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 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 as described in the EOA, staff feels this proposal complies with Goal 9.**

**Despite the findings of the EOA, the Planning Commission felt that the reduction of Light Industrial lands would negatively affect the available lands for industrial development. They also**

felt that there could be a conflict between the Light Industrial zoning across Gable Road and the proposed GC zoning. Staff does not feel there is any evidence to indicate a conflict between the zones.

***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:** The Council must find that the reduction of Light Industrial land will not negatively affect the available lands for industrial economic development.

**Finding:** Based on the determinations of Council, there are no conflicts with Statewide Planning Goals 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 used 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 remaining 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. 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 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. 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.

The Planning Commission expressed concern about traffic impacts of the zone change to the already-over-capacity intersection of Gable Road and US 30. Staff feels any development of the underdeveloped property will have some kind of impact on this overloaded intersection. However, the TPR has a specific definition for what a “significant impact” on a transportation facility is, and the proposed trip cap of 1,107 trips keeps the property below this threshold.

**Finding:** Depending on the determinations of City Council, the trips generated by the proposed zone change would not result in a significant impact to the city or the state transportation system with a condition of a trip cap of 1,107 daily trips for the underdeveloped lot. The City Council could consider also consider including a condition that any new development proposal on the subject property that normally requires a decision by the Planning Director will instead be subject to review and approval by the Planning Commission during a public hearing.

**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:** Staff feels proposal is not a “spot zone” per Chapter 17.16 SHMC. **The Council could consider granting less than the requested zone change (i.e., only the 5.67-acre parcel along Gable Road).**

## **CONCLUSION & RECOMMENDATIONS**

**Based on the facts and findings herein, the Planning Commission recommended denial of this Comprehensive Plan Map and Zoning District Map change.**

**Based on the facts and findings herein, staff recommends approval of the Comprehensive Plan Map and Zoning District Map Change, with the following conditions of approval for Council’s consideration:**

1. 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).

**<< If the City Council wants to include a public hearing for any future development >>**

2. Any new development proposal on the subject property that normally requires a decision by the Planning Director will instead be subject to review and approval by the Planning Commission during a public hearing.



**<< If the City Council wants to approve less than the full requested zone change >>**

3. Approval only applies to the 5.67-acre lot as shown in the attached Exhibit **(to be prepared).**

**Attachments:** Aerial Map  
Zoning Map  
Comp Plan Map  
CCMH TPR Analysis dated July 25, 2023 (19 pages)  
Applicant Narrative (9 pages)  
Presentation from CCMH dated September 12, 2023  
Additional Evidence from AKAAN dated September 12, 2023  
Letter from Sabrina Moore dated September 10, 2023  
Letter from Melvin and Rodney Moore dated September 12, 2023



# CPZA.1.23 AERIAL

-  Subject Property
-  Taxlots





# CPZA.1.23 ZONING


 Subject Property


 Building

## Zoning

 General Commercial (GC)

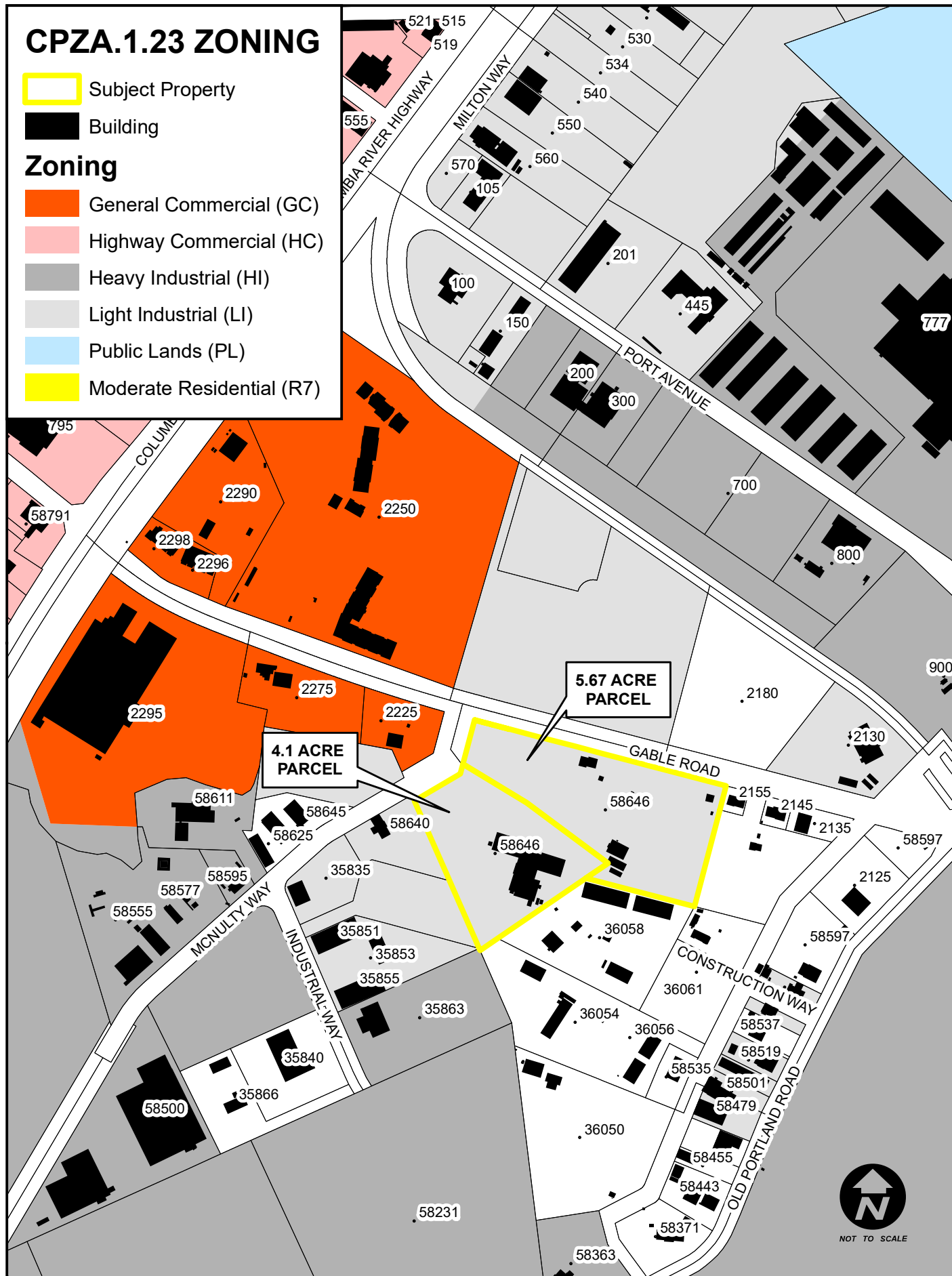
 Highway Commercial (HC)

 Heavy Industrial (HI)

 Light Industrial (LI)

 Public Lands (PL)

 Moderate Residential (R7)



# CPZA.1.23 COMP PLAN


 Subject Property


 Building

## Comprehensive Plan Map

 General Commercial (GC)

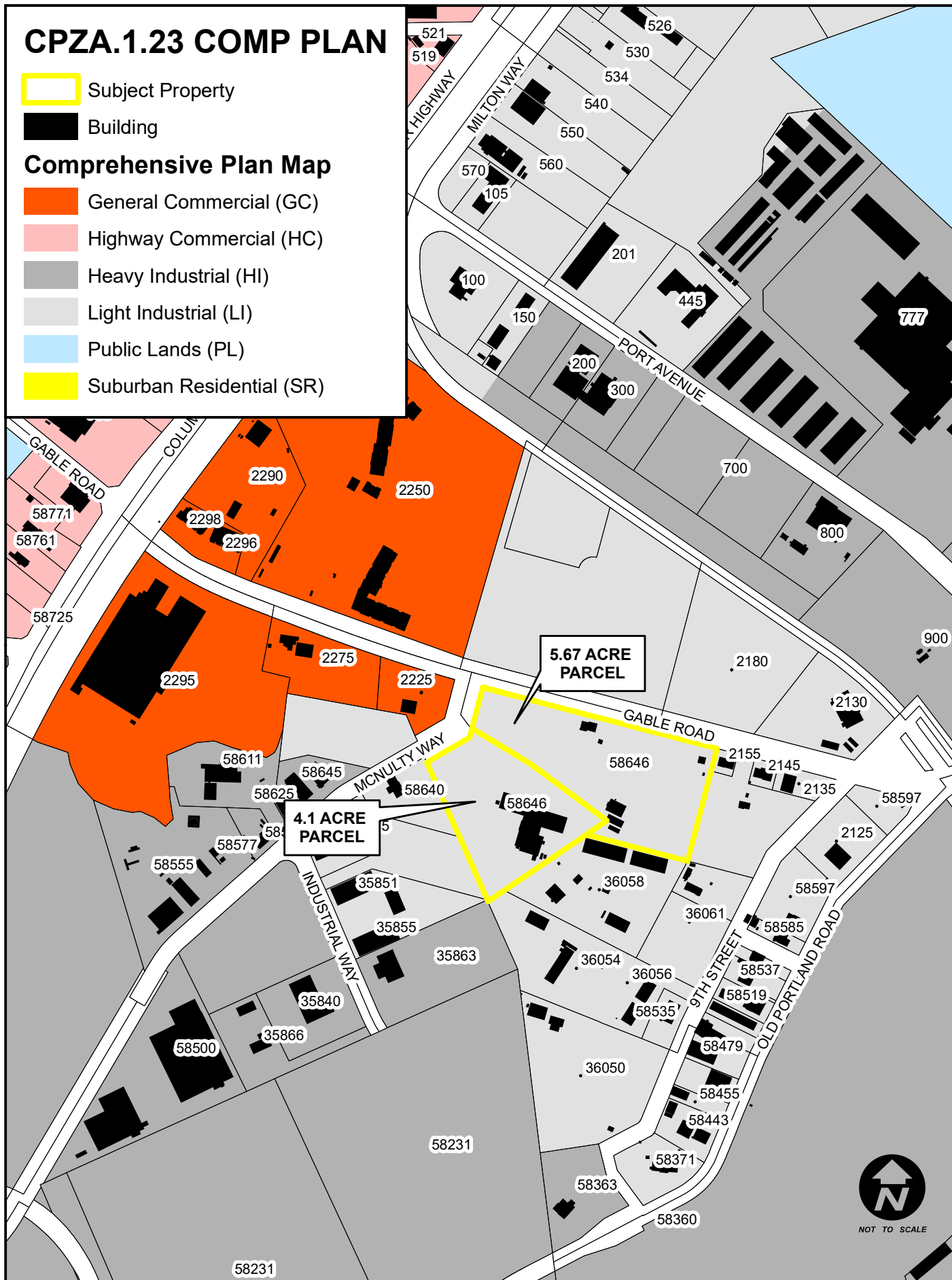
 Highway Commercial (HC)

 Heavy Industrial (HI)

 Light Industrial (LI)

 Public Lands (PL)

 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



RENEWALS: 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).

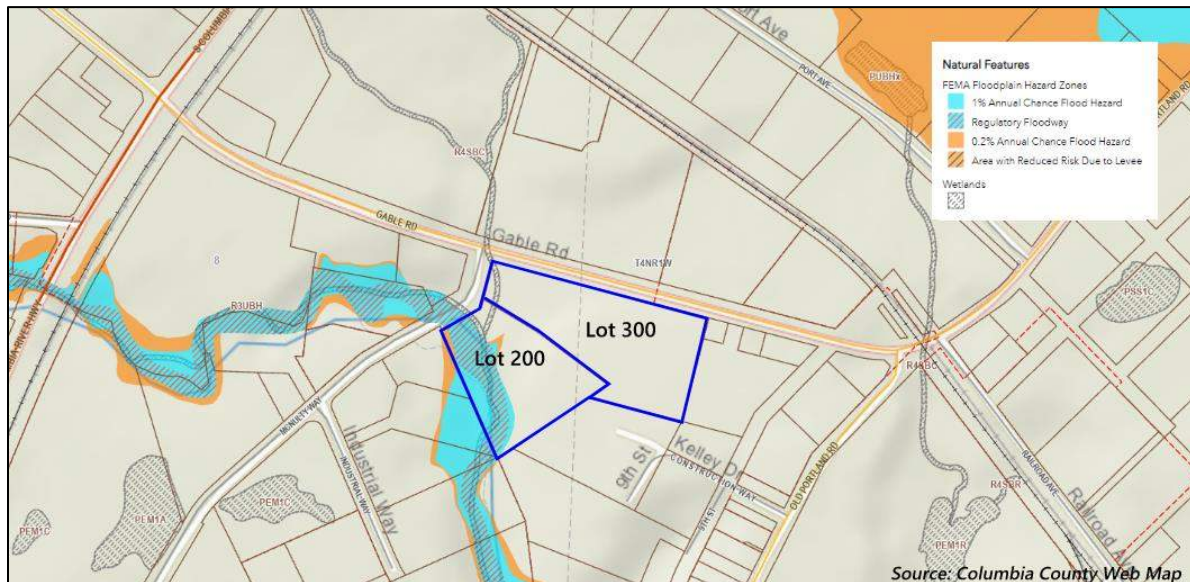


Figure 2: Natural Features

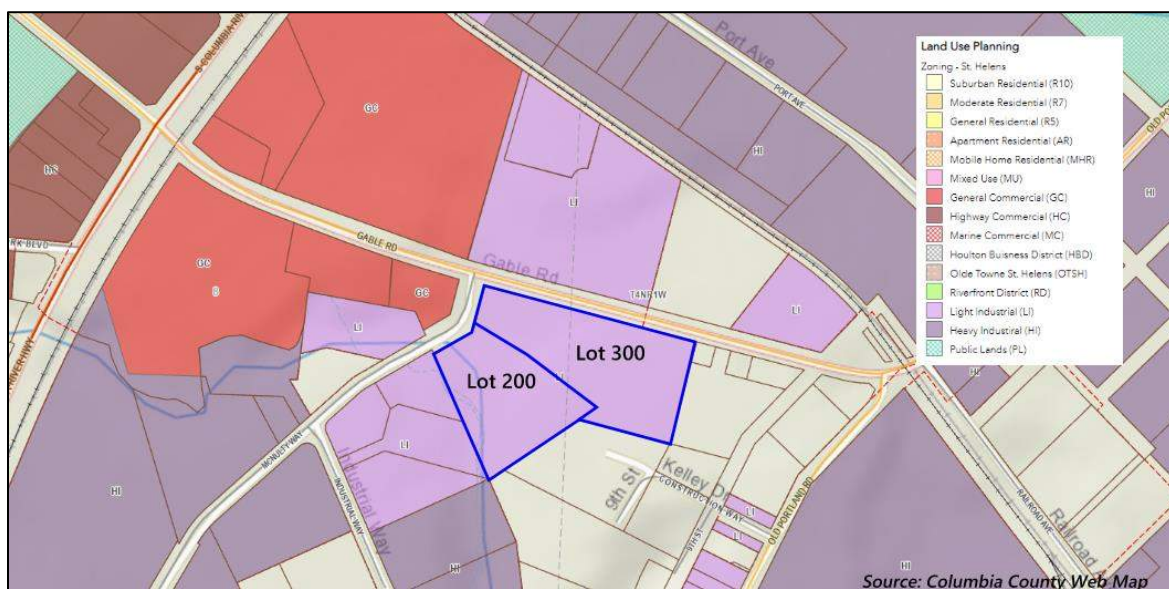


Figure 3: City of St. Helens Zoning



## 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*<sup>1</sup> 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.”

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<sup>1</sup> Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 11<sup>th</sup> 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*<sup>2</sup> 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.

<sup>2</sup> Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 11<sup>th</sup> 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.

RECEIVED @ 9-12-23 RE MEETING

Presentation to Planning Commission

St. Helens

September 12, 2023

CCMH current campus sits along both McNulty Way and Gable Road near Walmart and the Broadleaf Manor development.

Very brief history of CCMH.

CCMH mission is to create safe and supportive opportunities for healing and recovery for residents of Columbia County.

Behavioral Health needs continue to increase, creating a need for CCMH to expand current services and improve the continuum of care needed to meet that increasing need. Much of this expansion will happen along the Gable Road parcel of land owned by CCMH. I need to emphasize that CCMH has no intention of constructing a large facility like Broadleaf Manor. We have concepts for how we may need to develop the property, but these plans are contingent upon funding and need. Both of which do not exist now.

CCMH main office is located on the McNulty Way parcel, named the Creekside Center. Creekside is where our outpatient programs reside. As stated in the proposal, adjusting the zoning designation would support our current use, along with our proposed expansion plans. CCMH expansion plans are intended to serve Columbia County residents. Eligibility is contingent upon an approved Medical Condition which is stipulated by the Oregon Health Authority. Because enrollment at CCMH is contingent upon a medical condition, the amount of traffic created along Gable Road and McNulty Way will be unchanged. Those served by our expansion plans are already Columbia County residents being served by CCMH.

At the moment our plans include two possibilities:

The expansion includes one facility that has office space for between 8-12 employees. This facility will also have 8 rooms for Columbia County residents needing temporary support to stabilize due to a crisis event. This facility will be staffed 24/7 when residents are in the building.

The second development could be 15 transitional supportive studios. These housing units are transitional in nature and promote two objectives. First, to keep people from becoming houseless in our community. The second is to get them the treatment necessary for them to live independently within our community and make meaningful contributions.

All housing described falls within the category of congregate or residential. Because the facility serves a small population (only 15) unlike a nursing home, it probably won't be a fully licensed facility, but will be registered as a congregate care facility.



RECEIVED @ 9-12-23 VC MEETING

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

**Additional Evidence  
9/12/2023**

**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.

Part of Columbia Community Mental Health (CCMH) anticipated services includes two types of (non-traditional) housing.

One type of housing would be temporary crisis housing which would be approximately eight rooms reserved for short-term mental health crisis treatment. When these room are occupied the facility would be staffed 24/7 with personnel licensed by the Oregon Health Authority (OHA).

The second type of housing would be up to 15 transitional supportive housing units (studio units). These housing units are transitional in nature and promote two objectives. First, to keep people from becoming houseless in our community. The second is to get them the treatment they need so that they can live independently within our community and make meaningful contributions.

The St Helens Comprehensive Plan (Comp. Plan) includes the St Helens Housing Needs Analysis 2019, (adopted by reference, section 19,23.010).

The St Helens Housing Needs Analysis (SH-HNA) includes housing units entitled “group quarters”. The analysis includes in the future housing needs forecast a deficiency of “group quarters” for approximately 37 people.

The above type of housing is not allowed under CCMH’s current zoning: it is allowed in the General Commercial Zone.

This zone change to General Commercial furthers the goals Comp. Plan. by addressing the deficiency of “group quarters” as documented in the 2019 St Helens Housing Needs Analysis.

Attached:

Pages 15, 16,

SH-HNA, 2019, Volume 1 Summary Report

Page 18.

SH-HNA, 2019, Volume 2 Technical Appendix

### Families with Children

This category includes a subset of the baby boomers and millennials, and also includes householders between the age of 40 and 55. Taken as a whole, this category constitutes the majority of St. Helens population and is expected to increase moderately over the next two decades. Families prefer to live in a variety of single family housing options (detached homes or townhomes/plexes) at price points commensurate with their family income.

### Future Housing Need Forecast

The future (20 year) housing need forecast for St. Helens takes into account these factors. As reflected in the findings contained in Volume 2, Section II of the housing needs analysis, based on the projected population growth and housing market conditions, St. Helens is expected to add 3,617 people and that will require 1,621 net new dwelling units over the next 20 years.

As indicated below, this net new housing need is expected to consist of: 861 owner-occupied dwellings and 760 renter-occupied dwellings. As shown below, the types of housing that is most suited to meet qualifying income levels for home ownership vary by family income level.

Family Income Level	Owner-Occupied	Renter-Occupied	Total Dwellings	Dist. %	Attainable Housing Products
Upper (120% or more of MFI)	278	35	313	19%	Standard Homes, Townhomes
Middle (80% to 120% of MFI)	127	44	171	11%	Small Homes, Townhomes, Apartments
Low (50% to 80% of MFI)	236	182	417	26%	Small Homes, Townhomes, Mfgd. Homes, Plexes, Apts.
Very Low (30% to 50% of MFI)	140	218	359	22%	ADUs, Govt. Assisted Apts.
Extremely Low (less than 30% of MFI)	80	281	361	22%	Govt. Assisted Apts.
<b>Total</b>	<b>861</b>	<b>760</b>	<b>1,621</b>	<b>100%</b>	

\* Source: based on projected housing need and 2017 ACS household income and tenancy data for City of St. Helens.

The housing mix that addresses future demand will likely consist of: 959 single-family detached homes, 245 townhomes/duplexes, 333 multifamily housing units and 46 manufactured housing units.

There will also be some “group quarters” housing demand for about 37 people that require shared living arrangements (such as congregate care or group housing).

## 20-year Dwelling Unit Demand, St. Helens UGB

Housing Type	Owner-Occupied Dwelling Units	Renter-Occupied Dwelling Units	Total	Dist. %
Single Family Detached	790	169	959	59%
Townhomes / Plexes	29	216	245	15%
Multi family (5+ units)	0	333	333	21%
Mfg. home / other	42	4	46	3%
<b>Group Quarters</b>	<b>0</b>	<b>37</b>	<b>37</b>	<b>2%</b>
<b>Total Units</b>	<b>861</b>	<b>760</b>	<b>1,621</b>	<b>100%</b>

Source: derived from St. Helens HNA, Housing Needs Analysis, Task 2 findings, April, 2019.

The owner-occupied housing forecast that's suited to meet qualifying income levels is shown below.

### St. Helens Owner-Occupied Housing Needs: 2019-2039

Family Income Level	Upper Range of Qualifying Income	Upper Range of Home Price*	Housing Types	Estimated Distribution of Owner-Occupied Units	Projected Owner-Occupied Units Needed
Upper (120% or more of MFI)	Greater than \$89,640	Greater than \$469,000	Standard Homes	32%	278
Middle (80% to 120% of MFI)	\$89,640	\$469,000	Small and Standard Homes, Townhomes	15%	127
Low (50% to 80% of MFI)	\$59,760	\$313,000	Small Homes, Townhomes, Mfgd. Homes, Plexes	27%	236
Very Low (30% to 50% of MFI)	\$37,350	\$195,000	ADUs, Govt. Assisted	16%	140
Extremely Low (less than 30% of MFI)			Govt. Assisted	9%	80
<b>Total</b>				<b>100%</b>	<b>861</b>

\*Assumes 30% of income is used for mortgage payment, 20% downpayment, 5.5% interest, 30-year mortgage.



such as manufactured homes (3.4 units annually), plexes (0.4 units annually), and townhomes (0.2 units annually).

Future housing absorption levels will likely vary widely year to year depending upon several factors, such as national and regional economic activity, mortgage rates, infrastructure availability and development cost.

Exhibit 2.16: Residential Permits Issued by Type, St. Helens (2012-2017)

Type of Units	2013	2014	2015	2016	2017	Average Units Permitted Annually (2013-2017)
Single Family Dwelling	36	36	30	20	17	27.8
Manuf. Home	3	3	2	3	6	3.4
Duplex	1	0	0	0	1	0.4
Tri-Plex	0	0	0	0	1	0.2
Townhouses	4	0	0	2	0	1.2
<b>Total Dwelling Units</b>	<b>42</b>	<b>39</b>	<b>32</b>	<b>25</b>	<b>28</b>	<b>33.2</b>

Source: City Staff.

## HOUSING NEEDS SCENARIOS

### Summary of Housing Needs

Based on the population forecast described earlier in **Exhibit 2.2** and average household size estimates of 2.68 people per household (current estimate held constant into the future), the total net new housing demand within the St. Helens UGB is projected to be 1,433 housing units over the next 20 years (see **Exhibit 2.17**). This baseline housing need forecast assumes that the current average household size, group quarters share, and housing vacancy rate remains constant.

Exhibit 2.17: Baseline Housing Growth Projection

	Estimate 2019	Forecast 2039	Proj. Change 20 Years	Proj. AGR
St. Helens UGB Population	15,693	19,310	3,617	1.04%
Columbia County Population	52,225	61,902	9,677	0.85%
St. Helens Housing Needs				
Group Quarters Population	396	487	91	
Population in Households	15,297	18,823	3,526	
Avg. Household Size	2.68	2.68		
Occupied Housing Units	5,708	7,024	1,316	1.08%
Total Housing Units (baseline)	6,219	7,652	1,433	1.08%
Vacant Housing Units	511	629	118	1.08%
Percent of housing stock vacant	8%	8%	8%	

Source: Findings based on PSU Population Research Center data, Census data, and forecasts consistent with St. Helens UGB growth forecasts; FCS GROUP. AGR = annual average growth rate.

## Baseline Housing Demand by Dwelling Type and Tenancy

This baseline housing need forecast is consistent with the observed current mix of housing types throughout St. Helens and emerging market trends.

The baseline housing need forecast (shown in **Exhibit 2.18**) assumes that the UGB will accommodate 1,433 net new dwelling units over the next 20-years. **This baseline scenario forecasts housing unit demand to include:** 959 single-family detached homes; 245 townhomes/plexes, 183 multifamily units (apartments); and 46 mobile home/manufactured housing units. In addition, the local housing need also includes **37 additional residents that would need to be housed in shared living arrangements, single occupancy units, such as dormitories, congregate care, and other types of shared living arrangements.**

**Exhibit 2.18: Baseline Housing Need Forecast by Structure Type**

	Owner-Occupied Dwelling Units	Renter-Occupied Dwelling Units	Vacant Units	All Dwelling Units	Projected 20-year Change (Units)
Housing Tenure Distribution:	55.1%	36.7%	8.2%	100.0%	1,433
Housing Unit/Type Distribution					
Single Family Detached	92%	30%	67%	67%	959
Townhomes / Plexes	3%	38%	17%	17%	245
Multi family (5+ units)	0%	32%	13%	13%	183
Mfg. home/other	5%	1%	3%	3%	46
<b>Total Housing Units</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>1,433</b>
<b>Group quarters (single room occupancy)</b>					<b>37</b>
<b>Grand Total</b>					<b>1,470</b>

Source: Previous Tables

It should be noted that these housing forecasts are intended to account for net new housing that would be required to accommodate an increase in population by 3,617 residents, which is consistent with the PSU forecast for the St. Helens UGB. Additional housing would likely be required to replace the aging housing stock or to meet current pent up housing needs which have been expressed in prior tables.

## Expected Housing Demand by Dwelling Type and Tenancy

In light of the findings regarding current levels of pent-up housing demand discussed previously, the baseline housing need is expected to be supplemented by 150-units of pent up apartment demand. The resulting total 20-year housing need for St. Helens includes 1,621 units of housing, as summarized below in **Exhibit 2.19**.

Since Oregon SB 1051 resulted in changes to ORS 197.307 (Effect of need for certain housing in urban growth areas), cities are now required to provide adequate land zoned for residential use or commercial use or use land to meet needs of housing within the UGB at price ranges and rent levels that are affordable to households within the county, including but not limited to households with low incomes, very low incomes and extremely low incomes, as defined by U.S. Housing and Urban

September 10, 2023

This letter is meant to voice my objection and concerns to both the St. Helens Planning Commission and the St. Helens City Council in regards to the Comprehensive Plan and Zoning Map Amendment CPZA.1.23 request made by Columbia Community Mental Health.

In my research for this letter, I noticed that the surrounding uses and neighborhood characteristics were taken into account during you re-zone of property Ord. No. 3220, LI to AR. I request that the same thought and consideration be given to the surrounding properties in this case.

The planning report starts out with the site information/background for the properties, I would like to point out that CCMH knew their zoning before they purchased the main site, they knew the zoning when they purchased the Gable property, and they knew their zoning when they were annexed into the city. My point is that it should not have been a surprise that they would have to go through the conditional use or variance process in order to further develop the property, none of the existing conditions or future processes were a secret and were actually pointed out to them in writing by the City Planner back in 2016, 2 years before they annexed.

There are 3 ways to look at the zoning issue and how everything has progressed.

Option A is that the office is sited as a non-conforming use in the City of St. Helens and is grandfathered in since it was already there when annexed, they can go through the variance process as LI when they want to add or develop the property.

Option B is that the "CCMH complex can be considered as Major Public Facility, which is a conditional use in the City's Light Industrial Zone." Per the City of St. Helens planning memo dated December 16, 2016. The memo specifically states that offices are not an allowed use in the LI zone and that it will be important to consolidate the lots so the entire area can be considered a "major public facility" campus for zoning consistency. They can continue to develop and add office space through the conditional use process as a major public facility.

Option C is that the City of St. Helens looks at what is allowed in the county M2 zone and tweaks their LI uses to work better with the county uses. There will be many more properties that annex in the future that have been built using the M2 rules. The M2 rules allow all uses that are in the M3 zone. The M3 zone is industrial park which allows outright use for professional, executive, and administrative offices. Those offices do not need to be connected to an industrial use; this is how CCMH came to be sited where it is.

Goal 9 Economic Development comments:

You guys are working off of an inventory from 2008 and although it may show that you have enough LI land and need GC land the location of those zones should be taken into account. In this area specifically we had nearly 16 acres of GC land that was conditionally used for apartments. LI land is not something that you can easily create, if you do run out of LI you will



likely be trying to re-zone some HI due to the fact that people don't like to live near industrial uses of any kind, that is part of the reason why residential CU (care taker dwelling) is hard to obtain in LI areas, the caretaker needs to be directly connected to the business.

How much of the LI land counted in the inventory is non-conforming use that has been grandfathered in?

How much of the available LI land is being conditionally used or will be in the future for other purposes?

This CCMH property is across the street from GC land on one side, all adjoining properties are either LI or M2 which is the county's light industrial zoning that CCMH was zoned as before it annexed.

I feel that the existing line for GC and LI which is McNulty way is a good boundary for the zones.

Goal 12 Transportation comments:

The traffic memo is a very interesting read.

It shows us that if the land is developed as it's current zoning dictates the worst-case scenario you are looking at 536 daily trips, if it is zoned as GC, you are looking at... oh wait that's right they don't want to evaluate the worst-case scenario, instead they are proposing a trip cap instead of doing a traffic study. So now we have a trip cap for the zone change that is almost double what current zoning worst-case scenario is.

It proposes a traffic cap of 1107 daily trips, first question who is going to enforce that?

Second question, how is that going to be enforced?

We all know that the Gable/Hwy 30 intersection is bad. Your own TSP from 2011 shows the intersection was barely meeting standards. Your TSP stated "not projected to meet standards" and it was using counts from 2008 to formulate that plan.

The riverfront connector plan identifies all the roads impacted by this zone change as part of the corridor that connects Hwy 30 to the river front. Do not forget that 25 acres have been re-zoned at the river to Riverfront District Zone which allows for dense residential usage along with commercial uses. Development at the river will also cause traffic impacts. The connector plan states that the intersection's "safety and operational issues are well documented."

Just to put things into perspective our highway has seen a 3,000 daily trip gain from 2008 to 2021, the trip cap for this zone change will put 1/3 of that gain onto Gable Road and McNulty Way.

If the zone change is allowed how will subsequent developers of zone correct projects going to be treated with the traffic situation? This section of Gable is designated as a truck route and there are many large trucks servicing existing businesses that still use it on a regular basis due to the deficiencies of Hwy. 30/Millard, McNulty Way/Gable, and Gable/Old Portland intersections. What will this mean for the other industrial properties that are currently served by Gable Rd., Old Portland, or the McNulty/Industrial Way area. The Gable/McNulty and Gable/Hwy 30 intersections are also being used by the Scappoose school buses as they are now located on Milton Way down the road from the St. Helens school bus service. In short, this road is getting hammered by traffic of all kinds and we have not yet seen the full results of the new apartment complex.

Speaking of the traffic memo I find it odd the way they describe how the property will be used, it is described as if they will be living there.

***“The uses that CCMH have 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.”***

If this zone change really is for office space, why are they talking about traveling for employment, school, etc. As stated earlier residential uses are hard to get on LI land after reading this paragraph, I believe that CCMH’s ultimate goal is to get residential facilities on this site which are a CU in GC but are not allowed on LI.

The summary provided for their zone change is also a bit vague, it says the planned growth will be of the same type, offices & consulting rooms for mental health staff and related services, the related services is the vague part.

They now have a crisis center to support mental health/substance abuse issues, my understanding is that is a 23 hour stay for clients. Apparently that 1 hour makes the difference between being residential or not. The logical “continuum of care” would be to transfer them to a neighboring residential facility once they have calmed down at the crisis center.

During the City’s housing analysis in 2019 CCMH stated their desire to provide transitional housing for mental health issues and that they owned land that could be developed for transitional/homeless and/or special needs housing. It is no secret that this is the property they were speaking of, the sticking point is that that use is not allowed in the LI zone, hence the zone change request you are now considering.

In one breath the summary says they can’t expand but in the next it says they want the change to avoid the cumbersome CU or variance process for future buildings.

Upholding the current zone so that those processes are used for their future growth is the only way that any sort of order is kept by the city. If you allow the zone to jump across the road and invade the large block of LI then what is the point of any of the planning or maps that you put out. This zone change will be a failure on the City's part to adhere to the plan that was laid out long before CCMH built in the area. It will be a middle finger to everyone in the area that bought LI expecting industrial uses around them. The few homes that are in the area expected industrial uses around them. A change to GC will completely change the possible uses that are available to CCMH and therefore will completely change the neighborhood.

The county's M2 zone may be different from City LI, but they are not so different as to cause major issues for neighboring properties.

Why don't we build an fourplex on the LI property I have in the City, even though it does not make sense to do so because it is surrounded by industrial uses. When I bought the house I knew the zoning, uses, and pitfalls of having a residential home on LI and accepted the limitations that came with it. It is a non-conforming use that was grandfathered in, I cannot nor would I expect to change what is there.

Remember the rest of the surrounding properties bought into the neighborhood knowing what the allowed uses were for their property and the property around them, it absolutely factors into the purchasing decision, it also factors into the development decisions.

The LI property that CCMH is located on is part of a larger buffer that separates GC from Heavy Industrial, it is important to have these areas as buffers to create a logical flow of uses, densities, and safety.

The section about the zone expansion being the trend in the future along Gable Road is an interesting statement. This small novel you are reading is my argument against that happening. If you look at the current comprehensive map, they really are reaching into new territory with the GC zone. McNulty Way is the current dividing line between GC and LI (it makes a great divider) and the Broadleaf Arbor line is directly across Gable Road from it. Until there are some major improvements in this area, we need to keep that zone divide where it is. After improvements are made it may be worth revisiting, but it may be found that the rest of the area is zoned correctly as there is rail access for the property across Gable from this site and as shown all property bordering CCMH is developed industrial.



The statement that they would be forced to relocate (unconstitutional) or face regulatory hurdles to use their property is interesting. They would not be unconstitutionally forced to relocate nothing precludes them from continuing to use their land and the CU process is there to protect not only their interest but the surrounding property owners as well. It is a necessary process when you build in an area that is not zoned for what you are doing. They are not strangers to satellite facilities as I know of 4 others off the top of my head. There is actually HC and C3 land for sale within 500' of one of their other facilities, if that is the type of property they need, maybe look at acquiring that for needed facilities.

The claim that developing the property would not work without a re-configuration is false. There is approx. 2.35 acres available without touching the driveway, parking, or building areas accessed from Gable Road. Within a 1,000-foot radius of this site there are 7 properties, an additional 4 if you look a little further out, with current uses that range from 0.6 acres to 2.31 acres of space being used.

M. E. Moore Const.	1.31 acres	Old Bus Barn Construction Way	1.65 acres
Hudson Garbage Shop	2.25 acres	Stan's Refrigeration	0.81 acres
JLJ Earthmovers	2.21 acres	Industrial Way Park	1.40 acres
Kinnear Specialty	0.6 acres	CC LDS Office complex	2.31 acres
Sunset Equipment	2.07 acres	Current SH Bus Barn	1.5 acres
Current Scapp. Bus Barn	1.8 acres		

In closing, please consider the information that I have provided in this letter, once the zone change is made you can't take it back.

Looking at not only the current use and neighborhood, but also future possibilities/impacts of a zone change is difficult but it must all be taken into consideration. As they have a right to use their property, the rest of us have a right and expectation that when we buy in a particular area zoned for what we need that we will not face uses that impact our properties, businesses, and homes.

Thank you,

Sabrina Moore

September 12, 2023

St. Helens Planning Commission and St. Helens City Council,

This is a joint statement by Melvin Moore and Rodney Moore to object to the requested plan and zone map amendment CPZA.1.23 requested by CCMH.

My family purchased their first piece of property in this neighborhood back in 1990. The reason this land was chosen was specifically because of its zone and the zone of surrounding properties. We had been operating out of our shop on N. Vernonia Road, we knew that it was a matter of time before we were surrounded by residential homes. Although we could push the point of being grandfathered in, the business would no longer be compatible with the neighborhood, so we bought land and moved the business to a more suitable area.

As time went on, we continued to acquire property, build, and invest in our neighborhood. We bought and developed adjoining properties. We continue to run our business out of this neighborhood and I live in a care taker dwelling next to my business. To say that we have watched the area change is an understatement, there are many new buildings and businesses around us that were not present when we started here.

When CCMH made application for their main office my father agreed to not contest the review with an assurance from CCMH that it would only be offices and that they put up a fence to keep their clients contained to their land. They did and he did not contest it.

For a lot of years, we did not have any issues with CCMH or their clients, it was like any other business in the area, their people stay to their land and my people to my land. In the last few years, the amount and character of their clients have changed, with that they have started causing issues on our land and in the general neighborhood.

Our fear is that a change to GC will not only impact all of the regular things like density, vehicular and pedestrian traffic, road safety, storm water run off and such. It will allow CCMH the option of putting residential facilities on that land that will attract even more of the problems that we have now.

The first question asked of a trespasser on our land is where did you come from?

The answer more often than not is CCMH, and that is the folks that are with it enough to answer.

We have found people wandering aimlessly, running from aliens and/or unseen captors, behind a tree in our back yard using IV drugs, and in the middle of the road screaming as if they are hurt (they weren't). Listening to the tent campers fight for half the night, concerned for our neighbor (thought he was being attacked) only to find one of their clients fighting with himself.

Is this really what you want more of on one of our busier roads that lead to all the planned riverfront development?



We are concerned about traffic congestion, as it is we try and use other intersections and roads as much as possible but most of the time we have to use Gable/Hwy. 30 intersection because a dump truck and trailer do not do well at the alternate intersections due to road width/turning radius. Gable Road backs up quite a bit and we are left idling in traffic with everyone else wasting precious time and fuel.

We have started using another fuel station depending on what direction we are traveling. I have exclusively used Wilcox for more than 20 years, but due to the amount of traffic it is nearly impossible to take a left out of there with a dump truck and trailer to come back to my shop, and this is before the new apartments have fully opened.

I have witnessed multiple instances of children running across Gable Road from the apartments to Walmart without looking before they cross. I have been in the traffic jam that is caused by school buses trying to get through the area (really fun when they were stopping on Gable for the new apartments) and have actually altered my schedule for when my equipment leaves in an attempt to avoid the longest wait times.

Our community is developing in a way that is not user friendly for residents or businesses.

Access to the highway is one of the things that all business looks at when deciding where to locate. We have a decent amount of Heavy Industrial that is unused right now. How will we attract business to those sites if they don't have a safe and reliable route to move their goods and employees in an acceptable amount of time.

We have a comprehensive map and zoning for a reason, to make sure that everything works like it should, we need to stay with the plan we have in this case.

In conclusion the whole area up there is a mess, we absolutely do not need a zone change that will allow more dense uses to add to the existing mess.

Thank you,

Melvin Moore and Rodney Moore