



CITY OF ST. HELENS PLANNING DEPARTMENT

LAND USE FILE BRIEF

TO: Planning Commission
FROM: Jacob A. Graichen, AICP, City Planner
FILE: Conditional Use Permit **CUP.1.24**, Unlisted Use **U.1.24**, and Access Variance **VAR.7.24**
CCMH Gable Road Campus Expansion
DATE: September 30, 2024

This memo is not a substitute for the staff report or record of the file. It is a review aid.

This is a multiple application proposal and we'll start with the "Unlisted Use." The Unlisted Use (also referred to as a determination of similar use in other jurisdictions) is a tool to consider uses not listed under a zoning district.

The CCMH proposal include a new building that has a mix of offices and up to 16 sleeping rooms for displaced individuals who will be supervised by CCMH staff and associate site and street frontage improvements.

In sum, the General Commercial zone already allows multi-family development, senior/convalescent care, and residential facilities as conditional uses. The CCMH proposal can be considered an "intermediate care facility" and if the Commission agrees this is a similar use, would be possible at their Gable Road campus location. Use-wise "Intermediate care facility" (with some on-site care), is somewhere between normal multi-family (with no care) and senior/convalescent care and residential facility (with much on-site care). See staff report for definitions and details.

Staff doesn't see an issue, but because the use is not listed, that is debatable.

So, question # 1 for Unlisted Use **U.1.24**, is the use as proposed, ok?

The second issue is the Access Variance to keep an informal (gravel/underdeveloped) driveway approach along Gable Road in place for an existing approximate 625 square foot shop on the east side of the CCMH campus. Gable Road is a minor arterial classified street and as such, given its extensive current use and anticipated increasing use in the future, access is an important aspect of this proposal for the city. The functional integrity of Gable Road is critical.

There is a driveway spacing requirement not met for the shop's informal gravel access and this Variance is intended to preserve and improve the access despite that.

Question #2 for Access Variance **VAR.7.24** is are you ok with the driveway, which would be a third access point for the CCMH campus (one off McNulty Way and two off Gable Road).

If the Commission is open to keeping this access, there are at least two scenarios to consider:

1. The access is allowed to be exclusive to the shop with no vehicular link to the other accesses.

Under this scenario, a condition can be that the access is specific to the shop and can no longer be in place once the shop is gone. This is not the intent of the code as connectedness is sought by it, but the Variance could be the tool to allow the access exclusion.

The Commission could also require a land use restriction to be recorded on the deed.

2. That the access not only serve the shop, but the entire site. This is most appropriate given the arterial classification of Gable Road.

Staff thinks this is a critical missing element of the overall design considerations for the campus's growth and is best put in place now. It would need to meet city standards, which the partial future connection (which doesn't tie into the access variance driveway) contemplated now doesn't. Note because this future connection is only a concept, it is not approved by this application.

The third item for consideration is Conditional Use Permit **CUP.1.24**. Question #3, should it be approved and with what conditions?

This gets into overall site development standards. Summary of details:

- The creek has flood and other sensitive lands provisions, but is far enough away that it is not impacted by this proposal.
- There is a wetland on the NW side of the site, but it is not significant to the city and subject to the city's wetland rules. City will allow street frontage modification to help minimize its impact as has been done elsewhere.
- Since the application and plans poorly address or contemplate internal vehicular access such that each access point can be accessed without using Gable Road, staff recommends emphasis on that. This is best established now and should not depend on demolition of buildings or other possibilities that are not guaranteed.
- Off-street parking standards appear easy to meet. Some final details needed, including for existing spaces not depicted as actually striped (or just not marked at all). Also, the accessible parking and routes for the modulars and converted dwelling (development c. 2017-2018) is messy. Fixes are worth considering.
- Sanitary sewer service is complicated due to the use of a STEP system connector to the public system and private on-site improvements. This will bring the County into the mix, as they permit the on-site stuff.
- See conditions of approval towards the end of the staff report for more details. Ones in red text, are for particular consideration or have a greater change of being changed.

**CITY OF ST. HELENS PLANNING DEPARTMENT
STAFF REPORT**

Conditional Use Permit **CUP.1.24**, Unlisted Use **U.1.24**, and Access Variance **VAR.7.24**

DATE: September 30, 2024
TO: Planning Commission
FROM: Jacob A. Graichen, AICP, City Planner

APPLICANT: AKAAN Architecture + Design, LLC
OWNER: Columbia Community Mental Health (CCMH)

ZONING: General Commercial, GC
LOCATION: 58646 McNulty Way
PROPOSAL: Construct new building for an intermediate care and office facility and associated private and public improvements on the existing CCMH campus

SITE INFORMATION / BACKGROUND

The subject property abuts 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 03-09) to develop a 4.1-acre site with a 26,766 sq. ft. main CCMH building. County building permits approved in 2004.

2005 – 4.1-acre, original CCMH site, is annexed into the city.

2016 – CCMH receives 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. This is associated with the original 4.1 ac. CCMH site within city limits.

2017 – CCMH receives approval with County file DR 17-03 to build a 2,505 sq. ft. modular building on a 5.67-acre site (adjacent to the original 4.1 ac. CCMH site) and convert an existing 1,200 sq. ft. detached single-family dwelling into supporting office.

2018 – CCMH receives 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 site.

2019 – As part of the County’s DR 18-07 approval, the 5.67-acre lot was annexed into the city based on connected to city water (file A.2.19 and Ordinance No. 3245). Now the entire CCMH campus is within city limits, not just the original 4.1-acre portion annexed in 2005.

2023 – The site’s zoning is changed from Light Industrial to General Commercial (file CPZA.1.23 and Ordinance No. 3297) with a vehicle trip cap.

2024 – Earlier this year (prior to the applications that this staff report addresses) the applicant worked with the city to combine the multiple parcels that make up the subject property today (instrument 2024-1054). So, this does not need to be a condition of this proposal, being already done.

The main/original campus building is connected to city sewer with a private pump station and pressurized system (STEP 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: September 10, 2024. The applicant requested the hearing be continued to October 8, 2024 at 6:05pm. The Commission approved a motion to continue the hearing to this date and time at the September hearing. There was no other discussion at the September hearing.

Notice of this proposal was sent to surrounding property owners within 300 feet of the subject property(ies) on August 22, 2024 via first class mail. Notice was sent to agencies by mail or e-mail on the same date.

Notice was published on August 28, 2024 in The Chronicle newspaper.

APPLICATION COMPLETENESS

This application was originally received on August 6, 2024. Staff identified missing information or other aspects that rendered the application incomplete and notified the applicant of the issue pursuant to SHMC 17.24.050 on August 14, 2024. The applicant provided revised or new information and the application was deemed complete on August 23, 2024. The applicant provided a letter dated August 23, 2024 asking for a hearing in October instead of September and noted that this requested delay will not count towards the 120-day rule per ORS 227.178.

Based on the original deem complete date, the 120-day rule (ORS 227.178) for final action for this land use decision was December 21, 2024. The time between the September and October Planning Commission meetings is 28 days. December 21, 2024 + 28 days is January 18, 2025 and the current 120th day per ORS 227.178.

AGENCY REFERRALS & COMMENTS

City Engineering: See Engineering staff report ([attached](#)).

Columbia County On-site Wastewater Program: See letter dated September 23, 2024 ([attached](#)). Note that the address referenced in that memo—2195 Gable Road—was eliminated in 2019.

Columbia County Land Development Services Director: Per communication about a recent county decision for the adjacent property on the east side, germane to this decision given access aspects, the County's LDS director noted deficiencies in recent development (from c. 2017-2018) related to the modular buildings and converted dwelling on the CCMH site. Note this development predates annexation of this portion of the CCMH campus site, which occurred in 2019. Thus, all inspections and final approvals were while under the County's jurisdiction.



Left: Photo courtesy of Columbia County LDS Director. The Director's observation:

As for building N, while it does have a sign on the building with gravel parking it's in an unrealistic location, as it would be parked behind other parked vehicles.



Left: Photo courtesy of Columbia County LDS Director. The Director's comment:

CCMH portables with ramp but no ADA parking.

Note that this ramp is between buildings E and H.



Left: Photo taken by city staff on the opposite side of Building H, where the accessible space is located.

This is peculiar because of the minimal width (single lane) drive aisle to the accessible space. And why did this end up on the opposite side of the building as the ramp?

And given this, why does the plan show parallel parking spaces that would force a wheelchair-bound person into the vehicle traffic area for them to get to the ramp?

APPLICABLE CRITERIA, ANALYSIS & FINDINGS

Unlisted Use U.1.24

Because we want to make sure the use is consistent with zoning, the use issue will be addressed first.

SHMC 17.32.040 unlisted use—authorization of similar use, exists because as per SHMC 17.32.040(1)(a), “it is not possible to contemplate all of the various uses which will be compatible within a zoning district. Therefore, unintentional omissions occur.” Staff would add that code doesn’t necessarily keep up with a constantly evolving world.

The applicant requests that their proposed use be considered an “intermediate care facility” which is defined by Chapter 17.16 SHMC as:

“Intermediate care facility” means a facility which provides, on a regular basis, health-related care and services to individuals who do not require the degree of care and treatment which a hospital or skilled nursing facility is designated to provide, but who, because of their mental or physical condition, require care and services (above the level of room and board) which can be made available to them only through institutional facilities such as these. **See “long-term care facility” and “nursing or convalescent home.”**

To evaluate this both **SHMC 17.32.040(3) and (4)** need to be examined.

(3) Limitation.

(a) The director shall not authorize an unlisted use in a zoning district if the use is specifically listed in another zone as either a permitted use or a conditional use.

(b) The director shall only authorize a residential use that has on-site staff providing residential care, treatment, or training as defined in ORS **443.400** if the use is licensed or certified by a state agency to operate in Oregon prior to final occupancy.

(c) The decision of the director may be appealed in accordance with SHMC **17.24.290**.

(4) Approval Standards. Approval or denial of an unlisted use application by the director shall be based on findings that:

(a) The use is consistent with the comprehensive plan;

(b) The use is consistent with the intent and purpose of the applicable zoning district;

(c) The use is similar to and of the same general type as the uses listed in the zoning district;

(d) The use has similar intensity, density, and off-site impacts as the uses listed in the zoning district; and

(e) The use has similar impacts on the community facilities as the listed uses.

Finding: (3)(a) – “Intermediate care facility” is defined in the Development Code, but not listed as a use under any zoning district. However, it is cross referenced by definition—note the last sentence of the definition referring to “long-term care facility” and “nursing or convalescent home.” These are defined as:

“Long-term care facility” means an institution or a distinct part of an institution which is licensed or approved to provide health care under medical supervision for 24 or more consecutive hours to two or more patients who are not related to the governing authority or its members by marriage, blood or adoption. **See “extended care facility,” “intermediate care facility” and “nursing or convalescent home.”**

“Nursing or convalescent home” means a home, place or institution or part thereof in which convalescent and/or chronic care is rendered to two or more patients in exchange for compensation. Convalescent and/or chronic care includes, but is not limited to, the procedures commonly employed in nursing and caring for the sick; persons who are acutely ill or are surgical or maternity cases are excluded; qualified personnel and a consulting physician are available at all times; and isolation facilities are provided. **See “home, convalescent.”**

Also, “elderly or convalescent care facility” is germane to this matter. It is defined as:

“Elderly or convalescent care facility” means a living facility, licensed by the state of Oregon, that provides specialized care (such as meals, housekeeping and personal care assistance), supervision, treatment or training, or a combination of these services, for the elderly or for persons requiring daily nursing or medical care or supervision. **This definition includes, but is not limited to, congregate housing, continuing care retirement community, extended care facility, long-term care facility, and nursing or convalescent homes, but does not include residential facility.**

These uses by zoning district:

Long-term care facility →

Permitted Use: not listed

Conditional Use: not listed

Nursing/elderly/convalescent home/care →

Permitted Use: n/a

Conditional Use: R10, R7, R5, AR, MHR, MU, **GC**, RD Plaza, RD Mill, HBD

Not allowed: HC, LI, PL, RD Marina

The applicant notes that the use may evolve into a “residential facility” defined as:

“Residential facility” means a residential care, residential training or residential treatment facility, as defined in and licensed by the Department of Human Services under ORS 443.400 through 443.455 or ORS 418.205 through 418.327, that provides residential care alone or in conjunction with treatment or training or a combination thereof for six to 16 individuals who need not be related. Staff persons required to meet licensing requirements shall not be counted in the number of facility residents, and need not be related to each other or to any resident of the residential facility.

Pursuant to ORS 197.667 residential facilities are required to be treated the same as multifamily residential uses as far as being a permitted or conditional use in the applicable zoning district. Since multi-family residential development is a conditional use in the GC zone, so are Residential Facilities.

In conclusion “intermediate care facility” is not listed under any zoning district. Of the two other terms referenced in the “intermediate care facility,” “long term care facility” is not listed, but “Nursing or convalescent home” or “Elderly or convalescent care facility” are listed as a conditional use in most of the zoning districts.

The key difference appears to be the anticipated level of care, where the intermediate care is less than the elderly or convalescent care. Thus, the cross-referenced definitions in the “intermediate care facility” definition is not necessarily an indication of being listed elsewhere.

(3)(b) – ORS 443.400 specifically pertains to Residential Facilities and Residential Homes. The unlisted use request does not pertain to these.

(3)(c) – This is an appealable action.

(4)(a) – There is no evidence of a conflict with the Comprehensive Plan.

(4)(b)-(e) – The purpose of the GC zone pursuant to SHMC 17.32.110(1):

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.

Key point here is a broad range of services. The GC zone already allows multi-family development, senior/convalescent care, and residential facilities as conditional uses. And “Intermediate care facility” (with some on-site care), is somewhere between normal multi-family (with no care) and senior/convalescent care and residential facility (with much on-site care).

Impacts are anticipated to be comparable to existing listed used in the GC zoning district.

Staff recommends the Planning Commission acknowledge “intermediate care facility” as a conditional use in the GC zone.

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Access Variance V.7.24

An Access Variance is proposed to keep an existing driveway along Gable Road; the easternmost one. Gable Road is classified as a minor arterial street per the city’s Transportation Systems Plan. Because of Gable Road’s classification, its extensive current use, and anticipated increasing use in the future, access is an important aspect of this proposal for the city. The functional integrity of Gable Road is critical.

The number of street access points is supposed to be minimized to protect the function, safety and operation of the street and public passageways and potentially shared in order to maintain the spacing requirement [SHMC 17.84.040(8)(c)]. The spacing requirement for Gable Road is 200’ or midblock [SHMC 17.84.040(5)].

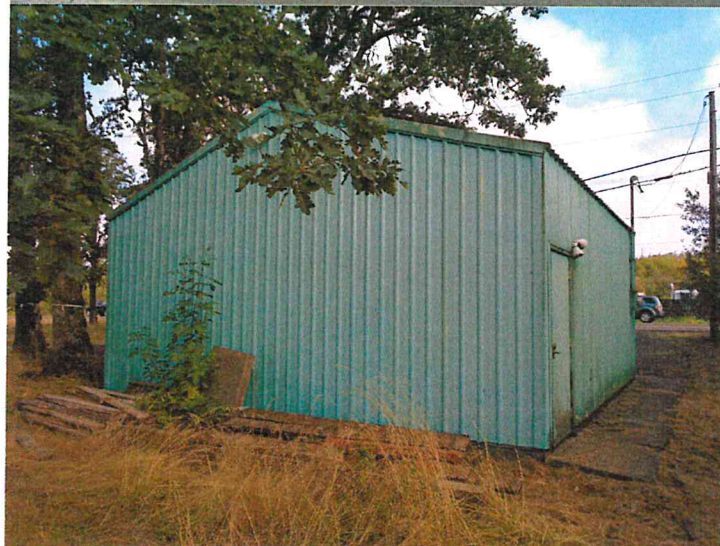
In addition, for arterial streets like Gable Road, there should be a frontage road that provides access or as an alternative interior interconnectedness between parking areas and such [SHMC 17.84.040(7)].

Access Variance approval standards per **SHMC 17.84.150**:

The commission may approve, approve with conditions, or deny a request for an access variance based on findings that:

- (1) It is not possible to share access;
- (2) There are no other alternative access points on the street in question or from another street;
- (3) The access separation requirements cannot be met;
- (4) There are unique or special conditions that make strict application of the standards impractical;
- (5) No engineering or construction solutions can be applied to mitigate the condition;
- (6) The request is the minimum variance required to provide adequate access;
- (7) The approved access or access approved with conditions will result in a safe access and will not result in the degradation of operational and safety integrity of the transportation system;
- (8) The visual clearance requirements of Chapter 17.76 SHMC will be met; and
- (9) No variance shall be granted where such hardship is self-created.

Discussion: With the current development proposal and additional potential for further development in the future, the fate of an access point currently for and exclusive to an approximate 25 x 25-foot shop building is the topic of discussion.



Upper left: Photo taken September 4, 2024. The CCMH shop building off Gable Road is a basic modest building currently accessed by an informal gravel driveway.

Lower left: Same building on the same day viewed from the back side. There is one man door visible here.

Finding: (1) – This criterion talks about shared access. The applicant argues it is not possible. Staff’s concern is lack of any internal connections now and insufficient internal connections contemplated for the future.

(2) – This criterion asks if there are alternative access points. The applicant focuses on the shop, its overhead door location and potential awkwardness with an access other than the current (gravel) one.

Since the basis is all about the shop and nothing else, the Commission, if considering approval, should consider a condition that the access variance is granted for the shop and is no longer valid without the shop. This may be most applicable if the Commission allows the access to be exclusive to the shop and not require internal circulation of all three of the site’s access points.

(3) – This criterion asks is the separation requirements cannot be met.

When allowed along a minor arterial, driveways are supposed to have 200’ separation measured from the center of the driveway. Staff disagrees with the applicant’s approximate 150’ distance from the driveway to the east due to legitimacy concerns (see attached memo dated September 23, 2024). Staff advises that, unless evidence of legitimacy can be provided, the Planning Commission must consider an approximate 110’ distance; the figure per the applicant narrative lacks any actual verification from the city, despite Gable Road being a city jurisdiction facility.

The applicant discussed awkwardness and location of the overhead door but does not detail why the overhead door cannot be changed to a different wall.

Should the tail wag the dog? If a simple building can be simply modified, and be accessed internally, which is supported by the code, why should that be basis for a Variance?

Since the basis is all about the shop and nothing else, the Commission, if considering approval, should consider a condition that the access variance is granted for the shop and is no longer valid without the shop.

(4) – This criterion asks if there are special or unique circumstances.

As with the other responses, the applicant focuses on the shop and does not explore relocation of overhead doors.

(5) – This criterion asks if there are no special engineering or construction solutions that can be applied to mitigate the condition.

The applicant notes that installing frontage improvements will mitigate the issue, focusing on that specific access point. Unfortunately, this is not comprehensive and ignores the bigger picture. Specifically, per SHMC 17.84.040(7), which requires a frontage road or interconnectedness to help relieve the arterial street of local access burden.

Why can't internal circulation be better incorporated into the design. Why is the shop access, only exclusive to itself? And, if the concern is the location of the main doors, why isn't the solution of relocating those considered for what appears to be a very basic building.

The Commission should consider mandating vehicular internal connectedness into the design, such that all accesses to the site (the one off McNulty Way and two off Gable Road, including the one that is the subject of this Variance) are not exclusive to specific areas. In other words, a vehicle should be able to use any of the three accesses for ingress and be able to use either of the other two for egress.

(6) – This criterion asks if the Variance is the minimum possible.

The applicant focuses on the existing nature of the access point.

(7) – This criterion asks if the access will be safe and not result in degradation of the operational and safety integrity of the transportation system.

As with (5) above, the applicant notes that installing frontage improvements will mitigate the issue, focusing on that specific access point. Arterial streets are intended to support through traffic with limited access points. This is why interconnections are required and the missing element for the design of this proposal.

The Commission should consider mandating vehicular internal connectedness into the design, such that all accesses to the site (the one off McNulty Way and two off Gable Road, including the one that is the subject of this Variance) are not exclusive to specific areas. In other words, a vehicle should be able to use any of the three accesses for ingress and be able to use any of the three for egress.

(8) – This criterion asks if the visual clearance standards of Chapter 17.76 SHMC will be met.

There is no evidence it cannot be met.

(9) – This criterion asks if the hardship is self-created or not.

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Conditional Use Permit CUP.1.24

Zoning Compliance: The site is zoned General Commercial, GC. The proposed uses of the proposed building are office and intermediate care facility. It may become a residential facility longer term.

Office is a permitted use and a predominant use of the CCMH campus (subject property).

If the Commission concurs with the unlisted use above, intermediate care facility is a conditional use. Residential facility is also a listed conditional use. Thus, this CUP application.

The proposed building is just under 24' in height, which is within the 45' maximum allowed.

No outdoor storage is proposed and the site is well within the maximum 90 percent impervious surface and minimum 10 percent landscaping thresholds.

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Sensitive Lands: The site abuts/contains some of Milton Creek along its southwest side. There is associated riparian area/upland protection zone (Chapter 17.40 SHMC) and floodplain (Chapter 17.46 SHMC) within the subject property, but proposed improvements stay clear of those areas.

There is a wetland area on the northwest side of the property, but it is not “significant” to the city subjecting it to the regulations of the city per Chapter 17.40 SHMC. Its is not in the area of development within the site but could be impacted by improvements to Gable Road.

Wetland Land Use Notification sent to Oregon DSL on September 4, 2024 as required by ORS 227.350.

For any proposed wetland impacts, proof that the impacts are allowed from the applicable agency (DSL and/or USACOE) shall be provided to the city.

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Landscaping/buffering/screening: **Street trees will be required.** The development includes street improvements and has more than 100' of abutting street frontage. This pertains to Gable Road as the McNulty Way frontage was improved previously.

There are overhead utility lines along the portion of Gable Road that fronts the subject, thus, street trees need to be “small” per this chapter. This requires a 20' spacing.

Tree location shall also comply with requirements per 17.72.035(2)(d)-(l). And, the city has allowed the “landscape” portion of street improvements to be behind the sidewalk when abutting a wetland, which the plans show.

Street frontage improvements details will be worked out further with civil plans for construction.

This chapter requires buffering. Adjacent properties along the east and south sides have a Comprehensive Plan designation of Light Industrial and would be zoned such is annexed. A 10' buffer is required between commercial uses and light industrial zones. The more than 150' distance from the building to the east and south property lines satisfies this.

This chapter requires. This applies in this case as follows:

Because the parking lot expansion will be greater than three spaces, it is required to be screened. For screening in this case, the city usually requires landscaping along the perimeter that includes a balance of low lying and vertical shrubbery and trees. This shall be required on final plans.

Service facilities and equipment (e.g., HVAC and other mechanical unit) visible from a public street, customer or residential parking area, any public facility or residential area are required to be screened whether they are ground, wall or roof mounted. In addition, rooftop facilities and equipment are required to be screened from street and adjacent properties.

The applicant acknowledges this but provides no details. There is no mention of other facilities. Screening required in all cases.

Refuse container or collection area are required to be screened (e.g., trash enclosure). The applicant mentions trash enclosure but provides no details. Required on final plans.

Interior parking lot landscaping. When off-street parking lots have more than 20 spaces, landscape islands are required with trees. This applies to the new parking proposed as the site has more than 20 spaces. Rows of parking spaces are not to exceed 7 spaces, generally. The “islands” are required to be no less than 48 square feet in area and no dimension less than six feet. They are required to have a combination of groundcover and shrubs in addition to a tree, such that at least 50% of the island will be covered with living plants. They are also required to be protected from vehicular damage by some form of wheel guard or curb that is permanently fixed to the ground.

This is generally shown, but final plans will need further details such as landscaping.

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Visual Clearance: Chapter 17.76 SHMC requires proper sight distances at intersections to reduce traffic hazard potential. The required area to maintain clear vision is greater for arterial streets.

No conflicts observed.

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Off-Street Parking/Loading: As a mix of offices and sleeping rooms for displaced individuals who will be supervised by CCMH staff, the best fit of parking category is SHMC 17.80.030(1)(d):

(d) Group care – One space per three residential beds plus one space for each employee on largest shift.

Per the applicant, the mix of offices and sleeping rooms will range from 12:8 to 4:16. With each office considered an employee count and each sleeping room as a bed count, this equates to a range of **15 to 10 off-street parking spaces required.**

Based on the permitting history noted above, the five existing buildings (excluding the maintenance shop on the east side) combined is 32,471 square feet. Using the office category, one space for every 350 square feet, this comes to 102 required parking spaces. Applicant notes different numbers, but in any case, approximately 148 spaces are proposed. The total off-street parking will exceed the minimum requirement.

There appears to be some discrepancy between existing spaces identified on the plans and those actually marked. Spaces that are not designated shall not be included on the plans and count towards the final parking county unless they are proposed to be marked and do not conflict with past approvals. But this number of spaces is not anticipated to reduce the total amount below the minimum required.



Left: Photo taken September 27, 2024 of the modular buildings south of the proposed building. Parking spaces as striped (or not striped such as the parallel spaces) conflict with the plans provided.

Dimension and type. All proposes spaces are standard size and meet the normal dimensional requirements.

Location. Parking spaces are required to be within 200 feet of the building served. The 36 or so new spaces are.

Accessible (disabled person) spaces. Required to comply with State and Federal Standards.

Also, accessible parking spaces are required to be located on the shortest route to an accessible pedestrian entrance. Though this is a building code issue, it is relevant to site design.

Two accessible spaces are proposed close to the proposed new building.

As noted above and as observed by the Columbia County LDS Director, there are shortcomings of development that occurred after the original building as it pertains to accessible spaces and accessible routes.

Bicycle parking. 1 lockable space is required at a rate of 10% of vehicle spaces, with fractions counting as whole spaces. Bicycle spaces are required to be within 50' of primary entrances, under cover when possible, and not located in parking aisles, landscape areas, or pedestrian ways.

Two spaces shall be included on the plans meeting these specifications.

Aisle width. Minimum aisle width for two-way vehicular circulation is 24 feet.

This is met for the access aisle proposed now, but a conceptual internal connection to the eastern portion of the property is not. Future internal circulation needs to meet the minimum standard. Note that this proposed internal access also displaces and accessible space and relies on removal of a building.

Note: this CUP et. al., is the not mechanism to approve conceptual future improvements. This is noted only to highlight the weakness of the overall design not contemplating proper internal circulation, given Gable Road's arterial classification.

Markings. All interior drives and access aisles are required to be marked and signed to indicate direction flow. This will be require for the final plans.

Surface area. All areas used for parking, storage or maneuvering of vehicles (including things towed by vehicles) shall be paved.

Wheel stops. Wheel stops are required along the boundaries of a parking lot, adjacent to interior landscape area, and along pedestrian ways. Curbing and wheel stops are shown.

Drainage. Drainage plans will be required to prevent ponding, prevent water flow across pedestrian ways and to address pollutants from vehicles (e.g., oil/water separation). The comments from the City's Engineering Manager details this further.

Lighting. Required to be directed to avoid glare from surrounding residences and roads/streets. No lighting plan or information has been provided. Lighting plan will be required.

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Access/egress/circulation:

Public street access. All vehicular access and egress per Chapter 17.84 SHMC is required to directly connect to a public or private street approved by the city for public use. Moreover, vehicular access is required to be within 50' of primary ground floor entrances.

The site abuts the following streets:

Street/Road Name	Public or Private	Street Class (TSP)	Jurisdiction	Improved?
McNulty Way	Public	Collector	City of St. Helens	Yes

Gable Road	Public	Minor Arterial	City of St. Helens	partial; no frontage improvements
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The site utilizes these streets for access and brings vehicle access within the statutory distance of the primary entrance.

The portion of the CCMH campus along McNulty Way is not changing or otherwise impacted. Access along Gable Road is discussed in greater detail above for the Access Variance.

Pedestrian access (interior walkways). Walkways shall extend from the ground floor entrances or from the ground floor landing of stairs, ramps, or elevators of all commercial, institutional, and industrial uses, to the streets which provide the required access and egress. Walkways shall provide convenient connections between buildings in multibuilding commercial, institutional, and industrial complexes. Walkways also shall provide access to existing and planned transit stops adjacent to the development site. Unless impractical, walkways should be constructed between a new development and neighboring developments.

The floorplan of the proposed building shows ground floor entrances on all sides, but not the corresponding walkways. Walkway connections internally are also proposed, though imperfect showing gaps. Plan revisions required.

Wherever required walkways cross vehicle access driveways or parking lots, such crossings shall be designed and located for pedestrian safety. Required walkways shall be physically separated from motor vehicle traffic and parking by either a minimum six-inch vertical separation (curbed) or a minimum three-foot horizontal separation, except that pedestrian crossings of traffic aisles are permitted for distances no greater than 36 feet if appropriate landscaping, pavement markings, or contrasting pavement materials are used. Walkways shall be a minimum of four feet in width, exclusive of vehicle overhangs and obstructions such as mailboxes, benches, bicycle racks, and sign posts, and shall be in compliance with ADA standards.

An approximate 30' crossing is proposed. Depending on how the applicant addresses internal vehicular circulation, this could change.

Walkways on plans appear to meet minimum width. All standards apply.

Required walkways shall be paved with hard-surfaced materials such as concrete, asphalt, stone, brick, etc. Walkways shall be required to be lighted and/or signed as needed for safety purposes. Soft-surfaced public use pathways may be provided only if such pathways are provided in addition to required pathways.

Walkways are assumed to be concrete; identification of materials to be on final plans as with lighting plan.

Access requirements based on type and intensity of use. With a parking lot exceeding 100 spaces, at least two access points are required. This is met regardless of whether or not the Access Variance for a third point of access is approved.

* * *

Signs: No signs are proposed at this time. New signs will require permits per Chapter 17.88 SHMC.

* * *

Solid Waste/Recyclables: Chapter 17.92 SHMC includes provisions for functional and adequate space for on-site storage and efficient collection of mixed solid waste and recyclables subject to pick up and removal by haulers.

The applicant mentions trash enclosure but provides no details. Both this Chapter and 17.72 include applicable details.

* * *

Site Development Review:

Buildings are required to be located to preserve existing trees and such. Per Chapter 17.96 SHMC trees with a 6” or greater dbh require preservation or replacement. Current proposal seems reasonable in this regard.

Crime prevention. Lighting plans will be needed. Staff observed that the poles used for overhead power within the boundary of the site include cobra-head lights, which will help.

The proposed building has good window coverage on all four sides for site observance and crime deterrence.

Potential future development shown on the plans is not approved by this proposal. For example, anything labeled as “possible future,” “future...if modulars removed,” and “future” in the application materials originally provided require future approval pursuant to SHMC 17.96.070, 17.96.080, 17.100.050 and 17.100.060.

* * *

Conditional Use: Pursuant to SHMC 17.100.040:

(1) The planning commission shall approve, approve with conditions, or deny an application for a conditional use or to enlarge or alter a conditional use based on findings of fact with respect to each of the following criteria:

- (a) The site size and dimensions provide adequate area for the needs of the proposed use;
- (b) The characteristics of the site are suitable for the proposed use considering size, shape, location, topography, and natural features;
- (c) All required public facilities have adequate capacity to serve the proposal;
- (d) The applicable requirements of the zoning district are met except as modified by this chapter;

- (e) The supplementary requirements set forth in Chapter 17.88 SHMC, Signs; and Chapter 17.96 SHMC, Site Development Review, if applicable, are met; and
- (f) The use will comply with the applicable policies of the comprehensive plan.

The CUP approval criteria are for the Commission's consideration.

SHMC 17.100.150 has additional requirements for certain conditional use types. The proposal does not include any of these.

SHMC 17.100.040(3) provides "condition of approval guidance" as follows:

- (3) The planning commission may impose conditions on its approval of a conditional use, which it finds are necessary to ensure the use is compatible with other use in the vicinity. These conditions may include, but are not limited to, the following:
 - (a) Limiting the hours, days, place, and manner of operation;
 - (b) Requiring design features which minimize environmental impacts such as noise, vibration, air pollution, glare, odor, and dust;
 - (c) Requiring additional setback areas, lot area, or lot depth or width;
 - (d) Limiting the building height, size or lot coverage, or location on the site;
 - (e) Designating the size, number, location, and design of vehicle access points;
 - (f) Requiring street right-of-way to be dedicated and the street to be improved;
 - (g) Requiring landscaping, screening, drainage and surfacing of parking and loading areas;
 - (h) Limiting the number, size, location, height, and lighting of signs;
 - (i) Limiting or setting standards for the location and intensity of outdoor lighting;
 - (j) Requiring berming, screening or landscaping and the establishment of standards for their installation and maintenance;
 - (k) Requiring and designating the size, height, location, and materials for fences; and
 - (l) Requiring the protection and preservation of existing trees, soils, vegetation, watercourses, habitat areas, and drainage areas.

These are for the Commission's consideration. Since the application and plans poorly address or contemplate internal vehicular access such that each access point can be accessed without using Gable Road, staff recommends emphasis on that. This is best established now and should not depend on demolition of buildings or other possibilities that are not guaranteed.

Because the off-street parking area is being updated, the Commission should consider requiring updates to all deficient accessible off-street parking spaces and routes to buildings built, placed or modified on the subject property after the original main building was built.

Potential future development shown on the plans is not approved by this proposal. For example, anything labeled as "possible future," "future...if modulars removed," and "future" in the application materials originally provided require future approval pursuant to SHMC 17.96.070, 17.96.080, 17.100.050 and 17.100.060.

* * *

Tree Removal/Preservation: Chapter 17.132 SHMC addresses the preservation of trees with a diameter at breast height (DBH) >12 inches. Protection is preferred over removal per this Chapter and Site Development Review Chapter 17.96 SHMC.

A tree plan was submitted, though it does not provide much information except for a couple trees on the site plan and lacks arborist input. These are probably the only impacted trees with a DBH >12”.

The site is heavily wooded along McNulty Creek along the south side, within/around a wetland area on the northwest side and a grove on the east side, with other scattered trees within the site. Given the quantity on the entire site, and that most of the wooded areas are not impacted, it is reasonable to conclude that less than 50% of these trees (>12” DBH) will be kept, the number lost is required to be replaced at a 1:1 ratio. The street trees that are part of the Gable Road frontage improvements proposed will provide sufficient replacement.

A protection program by an arborist defining the standards and methods that will be used to protect the existing trees to be preserved is required. This shall be on or with the Building Permit plan set to ensure contractors and others follow the tree protection plan during site development.

* * *

Street/Right-of-Way Standards: Gable Road is underdeveloped and the current design standard for the section abutting the subject property is based on the 2019 City’s Riverfront Connector Plan (Ord. 3241), which is a refinement of the City’s 2011 Transportation Systems Plan (Ord. No. 3150 and 3181).

The applicant acknowledges the benefits and need of these improvements by noting these improvements in its narrative and plans. A deviation is being allowed due to the existing wetland at the NW corner of the site. Existing trees may be used as street trees, and this will be the case along the wetland, they will just be behind the other frontage improvements instead of being a green strip between the non-vehicular lanes and vehicle travel lanes. This city has allowed this exception elsewhere such as for the Forest Trail Subdivision along Sykes Road and the new Middle School along N. 16th Streets.

Otherwise, design details including but not limited to median design, is subject to review by city engineering.

* * *

Utility Standards:

Water: The site is served by city water.

Storm Sewer: As per the City’s Engineering Manager, in addition to storm water plans, a 1200-C permit could be required. Storm water plans and other related permitting to be approved and in place prior to building permit issuance.

Sanitary Sewer: Sanitary sewer is more complicated due to a mix of on-site system and city sanitary sewer connection and current limitations of the city’s sanitary sewer infrastructure.

The comments from both the City Engineering Manager and Columbia County Environmental Services Specialist include the sanitary sewer issue.

There is on-site system infrastructure providing sanitary sewer to the area proposed to be developed, with potential challenges and limitations. The plans do not convey any such infrastructure, and this is not addressed in the applicant’s narrative.

Basically, the original portion of the CCMH campus (the 4.1-acre parcel annexed in 2005) utilizes a Septic Tank Effluent Pumping (STEP) system and the remainder (5.67-acres annexed in 2019) into the city on a private on-site system. It is the city’s understanding that the intent is to upgrade the STEP system for the new development. Sanitary sewer is not available elsewhere, other than via the STEP system that directs sanitary sewer northwesterly to McNulty Way and Gable Road.

Final plans will need to detail existing and proposed STEP system and private on-site system infrastructure and both city and county review and approvals will be necessary for the sanitary sewer service aspects of this proposal.

As it pertains to the current limitations of the city’s sanitary sewer infrastructure, the city adopted a new **Wastewater Master Plan (WWMP)** in November 2021 that identifies undersized trunk lines already operating at or above capacity that this development would depend on. The WWMP can be found here:

<https://www.sthelensoregon.gov/engineering/page/public-infrastructure-master-plans>

Sewer pipes are considered “at capacity” when peak flows exceed 85% of the full depth of the pipe in accordance with industry standards. This depth is based on the maximum depth of flow ratio (d/D), where “d” is the depth of flow and “D” is the pipe diameter. The WWMP includes an exhibit—Figure 18—that shows a potential overflow point at Kaster Road and a portion of sewer main by the wastewater treatment plant operating at 0.85-0.99 capacity. This is above 85% and thus above capacity.

Pipeline surcharging occurs as flows exceed the capacity of a full pipe, causing wastewater to back up into manholes and services. In addition to potentially backing up into homes and health risks associated with sanitary sewer overflows, Oregon DEQ prohibits all sanitary sewer overflows and can fine cities for allowing such and has done so to other jurisdictions. Examples of DEQ fines can be found here:

<https://www.oregon.gov/deq/Pages/enforcement-actions.aspx>

Given this issue, SHMC 17.152.090(4) must be considered:

Permits Denied. Development permits may be restricted by the commission or council (i.e., the applicable approval authority) where a deficiency exists in the existing sewer system or portion

thereof which cannot be rectified within the development and which if not rectified will result in a threat to public health or safety, surcharging of existing mains, or violations of state or federal standards pertaining to operation of the sewage treatment system.

There is a current deficiency (undersized pipes for existing demand) of a widespread scale within the city per the WWMP including infrastructure this development would need to utilize that could result in surcharging, fines (e.g., for violation of Oregon DEQ standards) and public health risks.

The Commission finds this development can still be approved under these circumstances given this criterion based on the following findings or conditions of approval:

- The deficient conveyance infrastructure this development depends on for sanitary sewer is a priority 1 in the WWMP. Priority rankings include three categories. There is no priority 2 conveyance improvements. The difference between priority 1 and 3, is priority 1 includes areas that have been reported to have overflows or significant surcharging during wet weather events, whereas priority 3 areas are where there have been infrequent or no observations of historical overflows or surcharging.
- City Public Works and Engineering staff have already begun to address the necessary sanitary sewer infrastructure upgrades having already received a State Revolving Fund Program loan (for below market rate loans) from Oregon DEQ to fund both priority 1 projects (in basins 4 and 5) and priority 3 projects in basin 6. This city has also acquired CDBG grant funds for design/engineering. Basin 5 is applicable to this proposal. It is anticipated that these improvements will be constructed in 2027.
- A condition of approval to require a fee per equivalent dwelling unit will be included. This is not a System Development Charge pursuant to ORS 223.299(4)(b); it is a temporary charge by order for development and land divisions proposed under these circumstances until the infrastructure is in order per the WWMP. The nexus is clear as it relates to the sewer conveyance deficiency and an amount has been determined based on calculations to determine fair proportionality—see attached **St. Helens Wastewater Collection System New Sewer Connection Surcharge memo**.

For this project, the fee per equivalent dwelling unit is \$3,200, and this estimated amount is determined to be a fair share quantity for this proposal. It is based on October 2022 dollars, and inflation must be considered.

Other: Code required utilities to be underground. There is overhead utility along the Gable Road right-of-way abutting the subject property and into the property from Gable Road.

This is shown on the existing conditions but is inconsistent on the plans (e.g., absent on sheet SP-1). This detail will be required on all final plans.

The overhead utility infrastructure within the site may remain provided no additional poles are needed. It was approved previously (preexisting) before being within city limits and the poles are also used for site lighting.

Per CRPUD, power needed by CCMH may result in new lines crossing Gable Road. There are currently two lines starting from a pole on the opposite of Gable Road than the subject property, going into the property. With increased power, this could multiply to four lines. Unless overhead power along Gable Road is undergrounded, requiring this to be undergrounded is not necessary, provided no new poles are needed.

* * *

Traffic Impact Analysis: A traffic impact analysis for the purpose of determining traffic impacts is not warranted. However, in 2023 when the site’s zoning was changed from Light Industrial to General Commercial (file CPZA.1.23 and Ordinance No. 3297), a trip cap was established as follows:

Any development and/or redevelopment of the subject property shall not trigger more than 700 daily trips within the TSP planning horizon of 2031 (as adopted in 2011 with Ord. No. 3150).

This is the first development/redevelopment proposal since the adoption of Ordinance No. 3150 on November 15, 2030. The applicant provided a memo dated August 2, 2024 from Jennifer Danziger, PE, of Lancaster Mobley, identifying the trip generation of this proposal to be 44. This leaves 656 daily vehicle trips for future development.

Note, the memo incorrectly identifies the trip cap at 1,107. The City Council adopted 700 as the cap and that is the cap number that must be used.

* * * * *

CONCLUSION & RECOMMENDATION

Based upon the facts and findings herein, staff recommends the Planning Commission acknowledge “intermediate care facility” as a conditional use in the GC zone.

Staff also recommends approval of this Conditional Use Permit and Access Variance with the following conditions:

1. These **Conditional Use Permit** and **Access Variance** approvals are valid for a limited time (to establish the use) pursuant to SHMC 17.100.030 and 17.84.140, respectively. They are valid for 1.5 years. A 1-year extension is possible but requires an application and fee. If the approval is not vested within the initial 1.5 year period or an extension (if approved), this is no longer valid and a new application would be required if the proposal is still desired.
2. The following shall be required prior to any development or building permit issuance:
 - a. Final plans as submitted with any development or building permit(s) shall comply with the plans submitted with this CUP/U/VAR with the following additions and/or corrections:
 - i. Final landscaping plans including all necessary details. New parking areas shall be “screened” along the perimeter that using a balance of low lying and vertical shrubbery and trees.

- ii. As per condition 4.
 - iii. Refuse collection area in accordance with the applicable provisions of Chapters 17.72 and 17.92 SHMC.
 - iv. There appears to be some discrepancy between existing spaces identified on the plans and those actually marked. Spaces that are not designated shall not be included on the plans and count towards the final parking county unless they are proposed to be marked and do not conflict with past approvals. Spaces that are marked shall be properly depicted on plans.
 - v. Two lockable bicycle spaces within 50' of a primary, under cover, and not located in parking aisles, landscape areas, or pedestrian ways.
 - vi. All interior drives and access aisles are required to be marked and signed to indicate direction flow.
 - vii. Lighting plan illuminating walkways, area vulnerable to crime such as but not limited to the new/modified parking areas.
 - viii. Walkways shall extend from all ground floor entrances or from the ground floor landing of stairs, ramps, or elevators, to Gable Road sidewalk.
 - ix. Internal walkways without gaps such as that shown between the proposed building and the closest existing building to the south on the preliminary plans.
 - x. Types of materials used, such as asphalt and concrete shall be identified.
 - xi. A protection program by a certified arborist defining the standards and methods that will be used to protect the existing trees to be preserved is required. This shall be on or with the Building Permit plan set to ensure contractors and others follow the tree protection plan during site development.
 - xii. Utility information including but not limited to water, sanitary sewer (including all STEP system and on-site infrastructure), storm, and other utilities including both existing and proposed overhead and underground shall be included.
 - xiii. Require internal vehicular circulation such that all accesses to the site (the one off McNulty Way and two off Gable Road, including the one that is the subject of this Variance) are not exclusive to specific areas. In other words, a vehicle should be able to use any of the three accesses for ingress and that same vehicle be able to use any of the three access for egress without leaving the site. This shall meet all applicable requirements such as width (24' for two-way circulation) and not depend on future removal of anything (i.e., it needs to be functional now).
 - xiv. Require any modification to the shop (e.g., changed or additional vehicle access doors?)
 - xv. Because the off-street parking area is being updated, the Commission should consider requiring updates to all deficient accessible off-street parking spaces and routes to buildings built, placed or modified on the subject property after the original main building (on the 4.1 ac. parcel) was built.
- b. Engineering construction plans shall be submitted for review and approval addressing all public improvements including but not limited to:
- i. This shall include public right-of-way street frontage improvements to Gable Road, and all other public infrastructure proposed or required, such as those related to sanitary sewer.

- ii. All street trees shall be “small” per Chapter 17.72 SHMC due to overhead utility along Gable Road. Tree location shall also comply with requirements per 17.72.035(2)(d)-(l).
 - iii. A drainage and stormwater plan by a certified by a registered professional engineer shall be submitted that addresses any increase in runoff from the site and how the potential impacts will be mitigated.
- c. Before any wetland impacts, proof that the impacts are allowed from the applicable agency (DSL and/or USACOE) shall be provided to the city.
 - d. DEQ 1200-C permit as required by city engineering.
 - e. An additional “fair share” fee shall be paid per equivalent dwelling unit (EDU) based on the portions of the city wastewater collection system between the subject property and the wastewater treatment plant, that this development depends on, that are at or above capacity as identified in the 2021 Wastewater Master Plan. Estimated per EDU cost is \$3,200 based on October 2022 dollars. Inflation adjustment to value at time of building permit issuance shall be included.
 - f. Need approval from Columbia County Land Development Services as it pertains to their jurisdiction over the method of sanitary sewer service and what will happen to existing facilities.
3. The following shall be required **prior to** Certificate of Occupancy by the City Building Official:
 - a. All improvements necessary to address the requirements herein, and in accordance with approved plans, shall be in place.
 - b. Need approval from Columbia County Land Development Services as it pertains to their jurisdiction over the method of sanitary sewer service and what is required for existing facilities such as abandonment.
 - c. Areas where natural vegetation has been removed, and that are not covered by approved landscaping, shall be replanted pursuant to SHMC 17.72.120.
 4. Any new service facilities such as gas meters and air conditioners which would otherwise be visible from a public street, customer or resident parking area, any public facility or any residential area shall be screened, **regardless if such screening is absent on any plan reviewed by the City. This includes but is not limited to ground mounted, roof mounted or building mounted units.** See SHMC 17.72.110(2).
 5. Disabled person parking space(s) shall comply with local, State, and Federal standards.
 6. Any requirement of the Fire Marshall as it applies to this proposal shall be met.
 7. Any new utilities shall be underground. Existing overhead utilities may remain above ground provided there are no new poles.
 8. Owner/Developer shall be solely responsible for obtaining all approvals, permits, licenses, and authorizations from the responsible Federal, State and local authorities, or other entities,

necessary to perform land clearing, construction and improvement of the subject property in the location and manner contemplated by Owner/Developer. City has no duty, responsibility or liability for requesting, obtaining, ensuring, or verifying Owner/Developer compliance with the applicable State and Federal agency permit or other approval requirements. This land use approval shall not be interpreted as a waiver, modification, or grant of any State or Federal agency or other permits or authorizations.

9. No plan submitted to the City for approval shall contradict another. For example, separate plans from the architect and engineer shall not conflict.
10. Potential future development shown on the plans is not approved by this proposal. For example, anything labeled as “possible future,” “future...if modulars removed,” and “future...” in the application materials originally provided are not approved.
11. Owner/applicant and their successors are still responsible to comply with the City Development Code (SHMC Title 17).
12. **Require that the easternmost access (the subject of the access Variance) be allowed but only for the existing shop building. When the existing shop building is discontinued as to use or removed/destroyed the eastern access point shall be eliminated.**

If the Commission considers this condition, you may want to also require a land use restriction recorded on the deed that notes this access removal requirement.

The commission can consider this by itself or with enhanced internal access per condition. The basis of this is the applicant focuses on the shop for access, thus we must assume if the shop left, the access would not be desired. However, this is a chance to help the applicant with fundamental design aspects and make sure there is legitimate internal access with all three street access integrated for internal access. See condition 2.a.xiii above.

Attachment(s):

- City Engineering staff report
- Letter from Columbia County Land Development Services
- Basis for driveway separation Memo dated September 23, 2024
- St. Helens Wastewater Collection System New Sewer Connection Surcharge memo (excerpts: pgs. 1-6, 13, and 25-26)
- Applicant’s narrative
- Trip generation memo dated August 2, 2024
- Plans

Note wetland information in record, but not added as an attachment to this report.



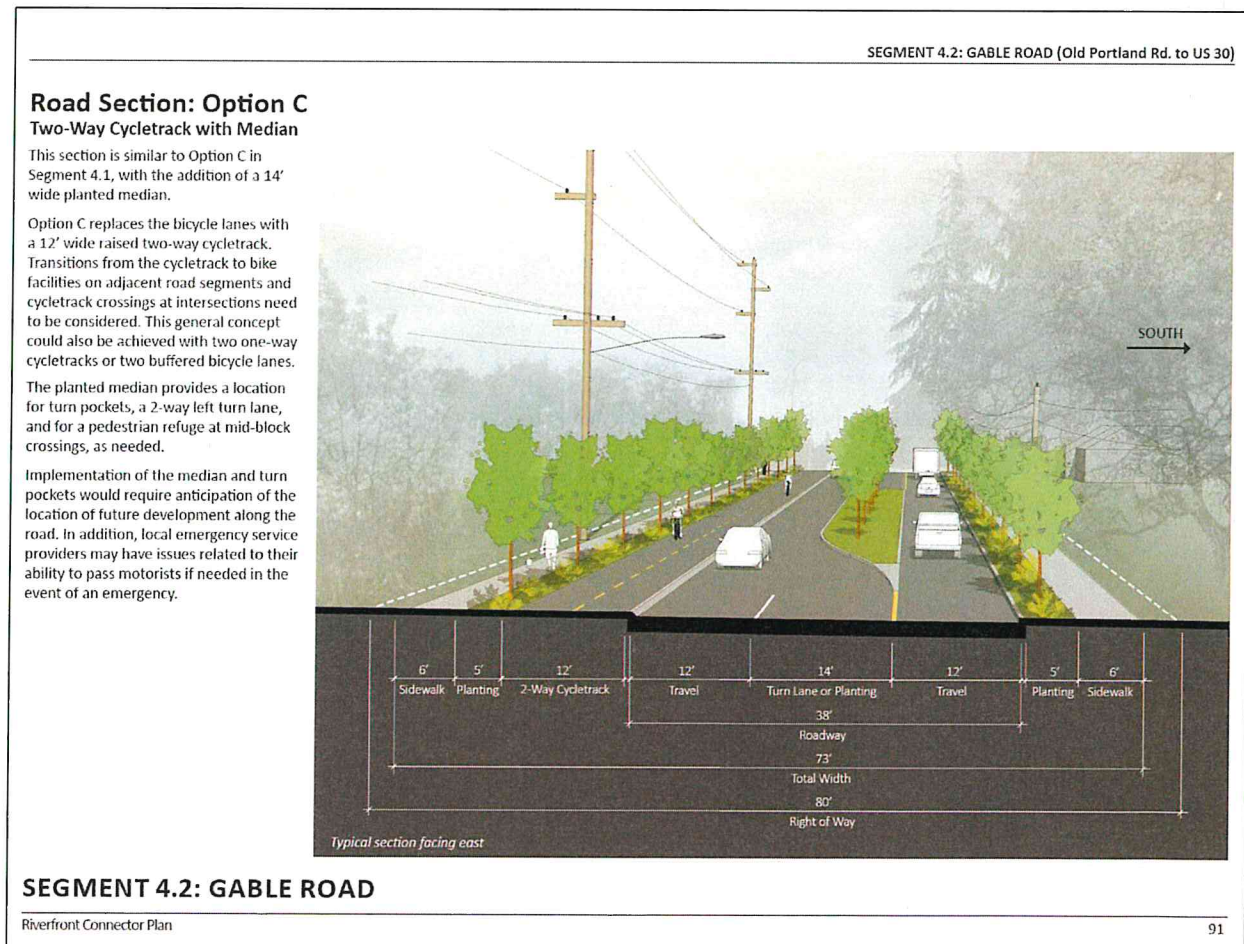
ENGINEERING STAFF REPORT

REPORT DATE	PROJECT	PREPARED BY
11/03/2023 <i>Sept 24</i>	Columbia County Mental Health (CCMH) Improvements At 58646 McNulty Way	Sharon Darroux Engineering Manager

REPORT

STREETS

Half street improvements are required. Frontage improvements along Gable Road and shall follow the City of St. Helens approved Riverfront Connector Master Plan. Along the northwest corner of the property adjacent to wetlands, 12-ft wide curb-tight concrete multi-use bicycle/pedestrian pathway shall be constructed.



WATER

- Water is available. No water main public improvements are anticipated.

SEWER

- Sewer capacity surcharge fee will apply for the additional EDUs. Property is located in the McNulty Sewer Basin and fee will be determined based on the St. Helens Wastewater Collection System New Sewer Connection Surcharge document, December 2022 revision for the McNulty Sewer Basin

STORM

- A 1200-C Construction Stormwater General (NPDES) Permit will be required for the site if construction activity and materials or equipment staging and stockpiling will disturb one or more acres of land.
 - * Because of the site's proximity to McNulty Creek, which is one of the impacted waterbodies listed in the City's Mercury TMDL Implementation Plan, the City may require a 1200-C Construction Stormwater General Permit on the basis of DEQ's permit requirement for "Any construction activity that may discharge stormwater to surface waters of the state that may be a significant contributor of pollutants to waters of the state or may cause an exceedance of a water quality standard".
- Site stormwater must be detained. Storm detention facility shall be designed to provide storage using the 25-year event, with the safe overflow conveyance of the 100-year storm. post-development peak release rates shall equal the pre-development release rates for their matching design storm event up to the 10-year design storm. The 25-year storm event peak release rate should not exceed the 10-year pre-development peak release rate. Calculations of site discharge for both the existing and proposed conditions is required.



September 23, 2024

City of St. Helens
Attn: Jacob Grachien

Subject: Columbia Community Mental Health Site Design Review for New Transitional Housing Facility
Subject Map: 4N-1W-09-BB-00300
Situs: 2195 Gable Rd, St. Helens, OR 97051

Re: Columbia County Onsite Wastewater System/Sanitation Comments

These comments are intended to be the formal response to the subject application to be discussed at the October 8th City of St. Helens Planning Commission Meeting. The Site Design review application narrative addresses the proposed use of a 16 bed Transitional Facility. While the occupancy of the building may initially vary, from a wastewater flows stand point the following comments will be based off of the intended final/future use.

The Main CCMH building accessed off McNulty way is currently served by City of St. Helens sewer; connection occurs via a step system to the line on McNulty way. This office does not have direct knowledge of this infrastructure as it is permitted through the City of St. Helens. The subject property at 2195 Gable Rd was approved and permitted for office type uses for youth counseling and includes the main office building off Gable Rd and several portable offices. These structures are connected to an onsite wastewater system installed under a Major Repair permit process. An onsite system was pursued due to the non-existence of an adequate sewer connection point on this side of the property. The Transitional Facility proposal states a plan to simply expand the existing onsite system to support the more intensive use. There are several factors to consider with this and the expansion of the system may not be an option:

- The existing onsite wastewater system is currently at capacity as far as the authorized uses and connections. The existing system has a design flow of 600 gallons per day (gpd).
- While a facility may pursue an Authorization Notice to increase the flows into a system, this is capped at a maximum of 300gpd over the permitted design flow and is also dependent on whether the components can support the increase. This increase would also have requirements to site a replacement system area which may not be feasible.
- The existing building at 2195 Gable Rd has already undergone some modifications through a building remodel that were not reviewed from a sanitation stand point, so it is unknown if the changes resulted in a more intensive use that may have required formal approval that is not captured in the design flow or existing permit information.
- A 16 bed transitional facility would have a design flow of 2000 gallons per day based of OAR 340-071-0220 Table 2 for Institutions other than Hospitals.
- The total design flow would be a combination of the existing system flows and the new proposed flows (2000gpd + 600gpd= 2600gpd) and would exceed the 2,500gpd maximum

threshold that can be permitted under the County. This would require the property owner to pursue a State of Oregon Water Pollution Control Facilities Permit through DEQ.

- The area that the existing onsite system is located was used to its maximum to site the repair Onsite wastewater system. The site has shallow to bedrock soils that are impacted by the water table in the winter. It is not expected that the system could be enlarged to support increasing the size of the system.
- It is expected that based off of flows alone, DEQ may find that connection to City sewer would be applicable prior to even reviewing or considering an expansion to the existing system, which as explained, may not be feasible.
- If it was found that sewer was not outright applicable, and if it was determined that the system could not be expanded as expected, then connection to City sewer would be required as a matter of Septage management to proceed with the proposed use.
- Additionally, the site plan submitted does not actually include any septic system infrastructure and potential future building and parking areas would be in conflict with the septic systems location.

In summary, connection and expansion of the existing onsite wastewater system may not be possible and would be a significant infrastructure upgrade to overcome before the owner could proceed with constructing the new facility. It is recommended that the services of the Onsite wastewater consultant be retained for further contemplation, but it also appears that connection to city sewer is likely to be the most viable option.

Sincerely,



Erin O'Connell
Environmental Services Specialist



CITY OF ST. HELENS PLANNING DEPARTMENT

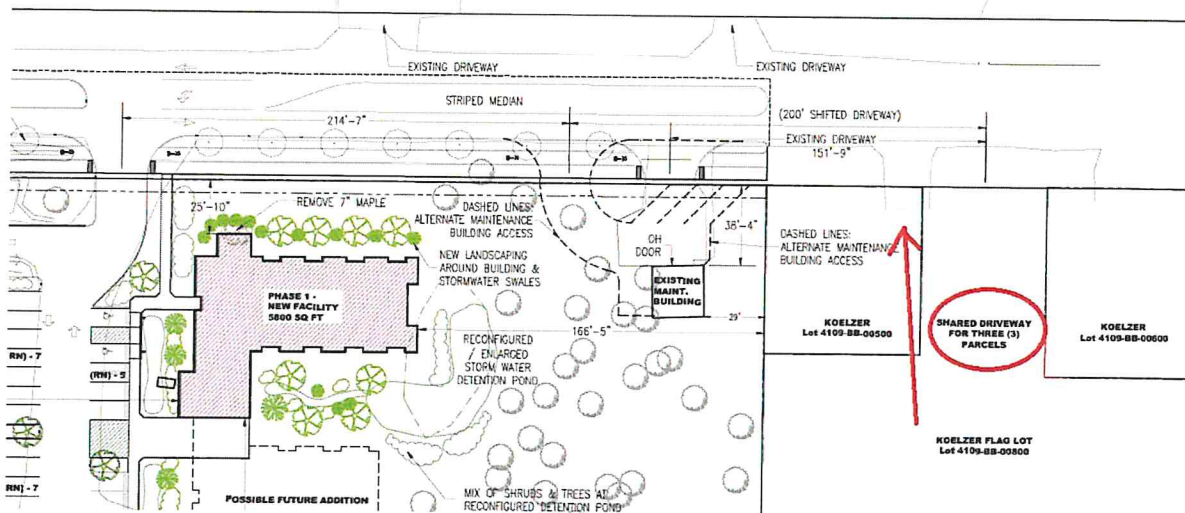
MEMORANDUM

TO: Planning Commission & City Engineering
FROM: Jacob A. Graichen, AICP, City Planner
RE: Basis for driveway separation RE file Conditional Use Permit CUP.1.24, Unlisted Use U.1.24, and Access Variance VAR.7.24
DATE: September 23, 2024

The plans and narrative provided for this application note a driveway separation of 151'9" between the "CCMH shop driveway," the subject of Access Variance VAR.7.24, and the closest driveway to the east.

Noteworthy, the plans also depict a driveway that is closer at approximately 110 feet. This closer driveway is identified on the existing conditions too. This memo is intended to help you understand this discrepancy.

Below: An excerpt of the site plan provided with this application. The driveway (also identified on the existing conditions) is shown here as identified by the red arrow but not acknowledged by the applicant. Though recent physical changes have occurred, they are not necessarily legal changes. The notation on the plans circled in red is relevant to this.



The three properties on the right were purchased by Erik and Shannon Koelzer c. 2019. Around this time, Erik inquired with the County (Land Development Services) about land use things and as is typical, County staff said they should talk to the City of St. Helens too because it is within the City's Urban Growth Boundary. While the CCMH property is within city limits, the Koelzer properties are not. Soon after speaking with County staff, Erik spoke to me and because Gable Road is a minor arterial street and a street under the city's jurisdiction, access was and continues to be an important matter to discuss. Generally, we spoke of consolidation such that the three properties share one access.

Access considerations are typical for land use permitting review and it was anticipated that new uses or changed uses would require land use permitting like Site Design Review. This was particularly anticipated because the two buildings along Gable Road on the Koelzer were used as dwellings and a change from a dwelling to non-residential use is a change of occupancy per the building code. In fact, Columbia County Zoning Ordinance (CCZO) is clear on this. CCZO 1551.B.2 notes a change of category of use requires Site Design Review.

Despite this, the County allowed Building Permit No. 192-24-000690-STR to change the use from a dwelling to an office without Site Development Review based on a non-conforming use provision per CCZO 1506.3 that states:

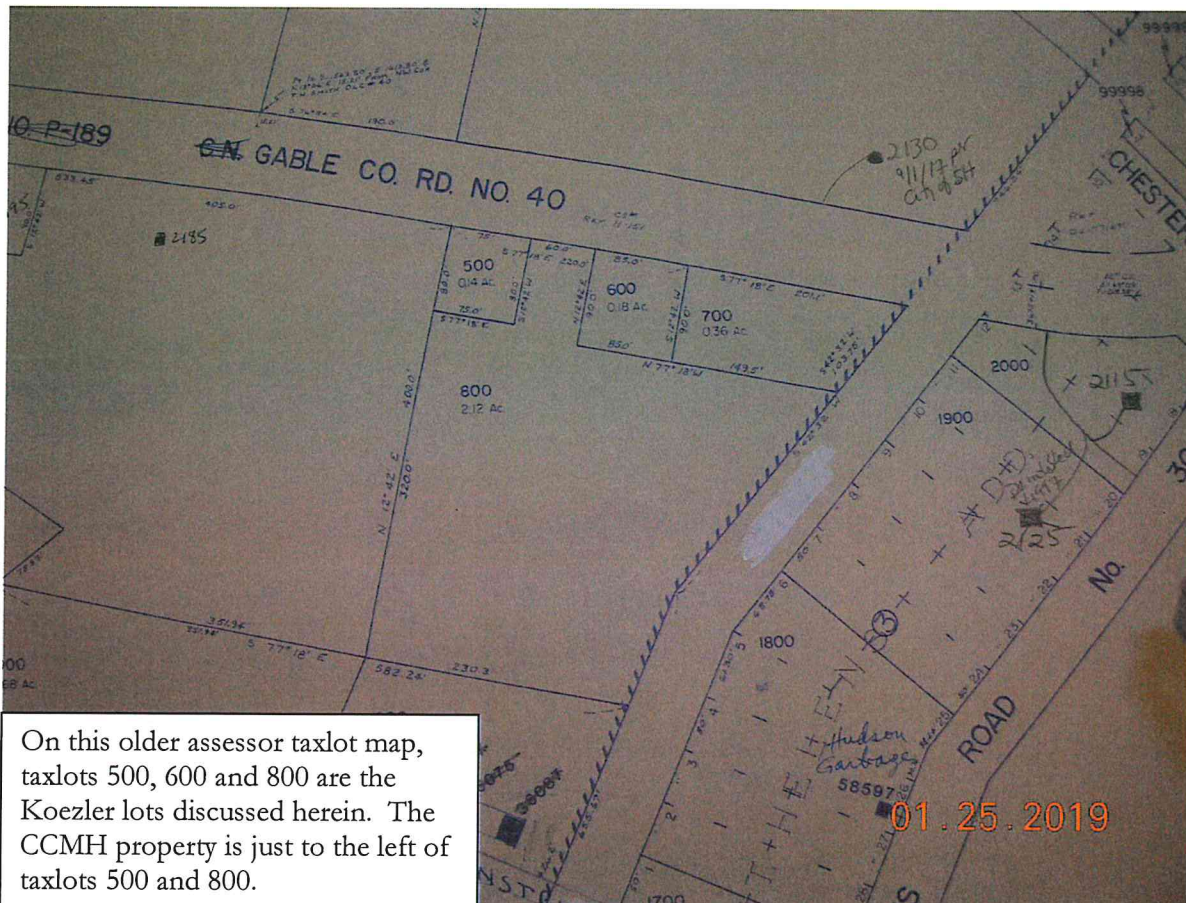
A Non-Conforming Use may be changed to a use allowable under the underlying district. After a Non-Conforming Use changes to a conforming use, it shall not thereafter be changed back to a Non-Conforming Use.

CCZO 1506.3 is about non-conforming use status, not permitting exemption. There is nowhere in the CCZO that says 1506.3 exempts CCZO 1551.B.2, so that adds a peculiar element to this.

Despite no land use decision, Erik still implemented, at least physically, a shared access. This is after several years since our discussion mentioned above, so great credit to him. However, there is no record requiring this and nothing has been provided that the three parcels are legally bound to use a sole shared access. Moreover, this "shared access" constitutes improvements in the Gable Road right-of-way without any permit for work in the right-of-way from the City of St. Helens. Gable Road is a city jurisdiction road.

Based on staff research, each parcel appears to have been created a long enough time ago that they would be considered legal lots of record. Thus, there is little preventing the three parcels to be owned by three separate entities who may not want a shared drive and want to go back to individual drives.

Because of this illegitimacy of the circumstances as of the date of this memo, staff is not comfortable basing a driveway distance on this. The planning commission must use the 110' distance unless better evidence of legitimacy is provided.





Above: Street view of the taxlots 500, 600 and 800 as shown above, also known as 2145 and 2155 Gable Road in late 2018. Note the individual driveways to each dwelling and lack of central drive. Also note the woodlands in the background.

Below: Same street view on September 4, 2024 showing significant changes, including un-permitted work in the Gable Road right-of-way and potential new use (note lack of trees now). There is no right-of-way permit with the city, land use file with the county, or any other evidence of the legitimacy of this access work.





St. Helens Wastewater Collection System New Sewer Connection Surcharge

*EXCERPT FOR
CUD.1.24 et. al.
PAGES: 1-6, 13, & 25-26*

December 1, 2022
Revision 01

CITY OF ST. HELENS
265 STRAND STREET | ST. HELENS, OREGON 97051
503.397.6272 | WWW.STHELENSOREGON.GOV

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SECTION 1 – BACKGROUND

1.1 Wastewater Masterplan 2021 Update

The City of St. Helens provides sanitary sewer collection services to businesses and residences within the City limits. The sanitary sewer collection system is a combination of over 60 miles of gravity and force mains, 9 lift stations, and over 1,700 sanitary sewer manholes, vaults, and cleanouts. The sewer pipes in the City range from 6-inches to 48-inches in diameter, with the majority of the pipes being 8-inch. All sewage flows are conveyed to the City's wastewater treatment facility.

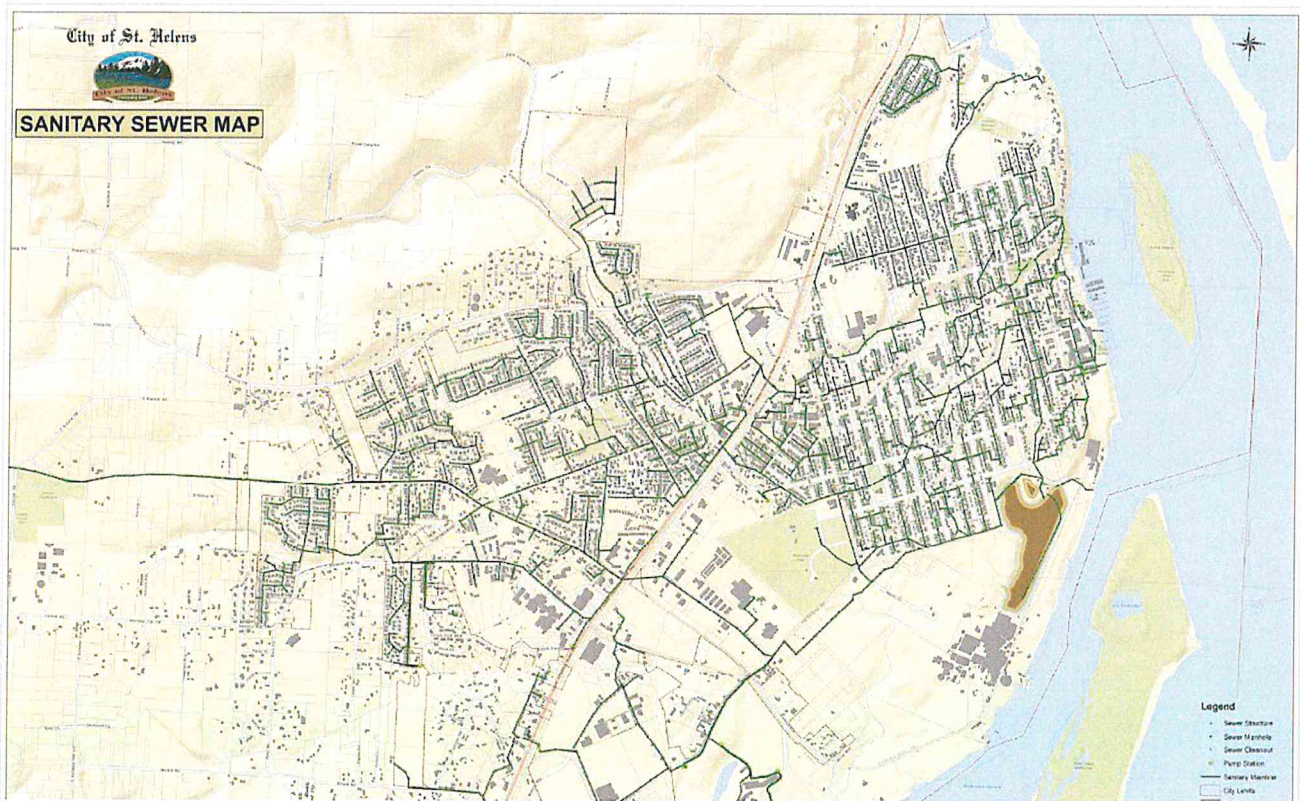


Figure 1.1.A St. Helens Sanitary Sewer Map

On November 17, 2021, the St. Helens City Council adopted the updated Wastewater Master Plan (WWMP) under Resolution No. 1940. This update to the City's WWMP is the first complete study done on the entire sewer collection system since 1989. The population was 7,500 at the time. Since then, the population of St. Helens has grown to over 14,500 – almost double. With this added population, more load is added to the public sewer system. Meanwhile, the size of the sewers have not been increased.

After 33 years of growth, the WWMP revealed that the majority of the City's sewer trunklines are at operating at or above capacity. This means that the greater portion of the City's public sewer system is inadequate to serve a growing population. Without

increasing the sizes of the trunklines, there is an increased risk of sanitary sewer overflows in the collection system.

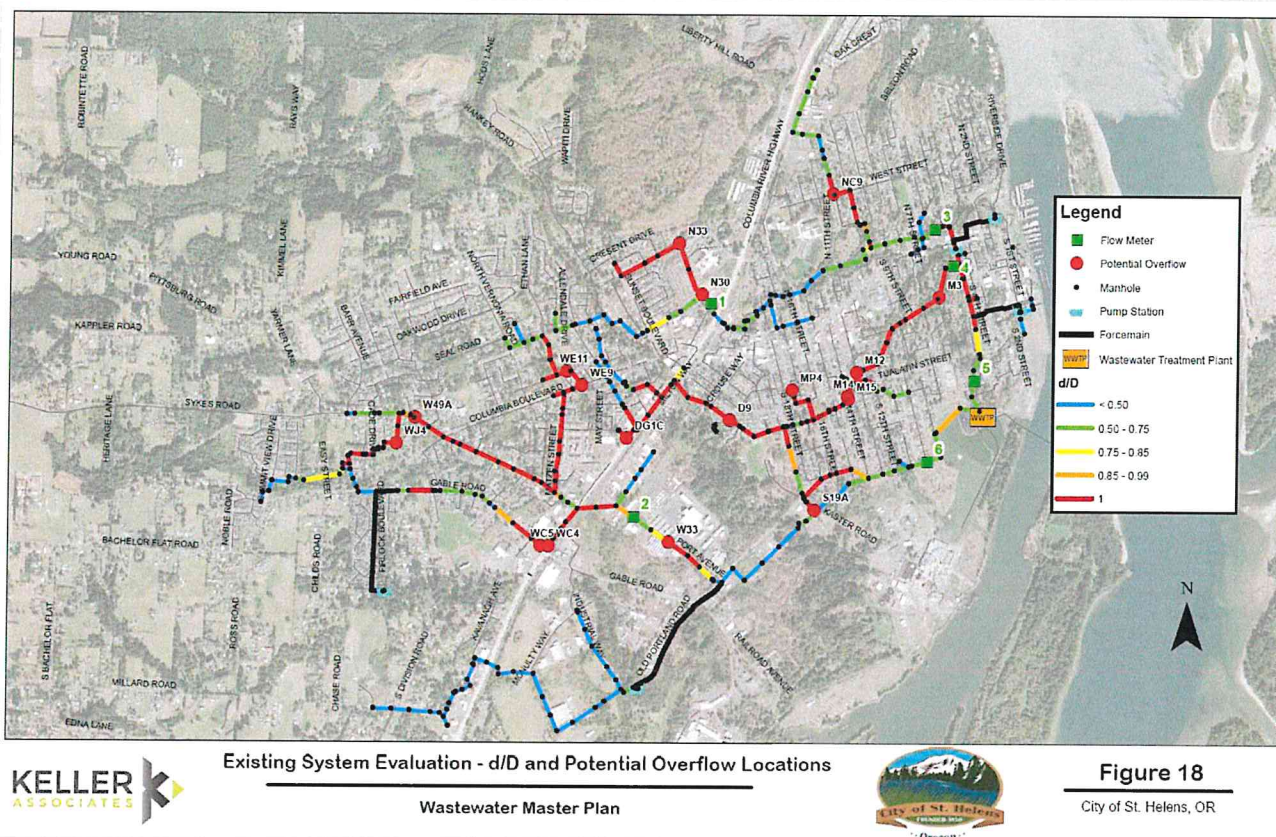


Figure 1.1.B Existing Sanitary Sewer Evaluation Map (2021 WWMP)

1.2 New Development Sewer Surcharge

To assess the impacts of future development on the public sewer system and how the City could pay for the costly capital improvements identified in the WWMP, Keller Associates performed an assessment of a sewer charge based on the shared of costs that new upstream Equivalent Dwelling Units (EDUs), as identified in the 2019 Housing Needs Analysis, would pay to complete the downstream CIP improvements along trunk lines that convey their sewage flows. The costs per EDU were based on the CIP project costs broken down by trunkline.

This sewer surcharge assessed per EDU is to fund capacity upgrades to the public sewer system and will be levied on those properties and developments requiring connection to the sewer trunklines identified in the 2021 WWMP update as "at or above" capacity. These fees will allow the City to recover a fair portion of the infrastructure improvements made by the City to accommodate new users and be used solely for public sewer capacity improvements. Equivalent Dwelling Units conversion details for sewer charges for multifamily dwellings, commercial, and industrial land uses may be found in Section 4 – EQUIVALENT DWELLING UNIT CONVERSION.

SECTION 2 – ST. HELENS SEWER TRUNKLINE BASINS

2.1 Sanitary Sewer Trunk Basins Methodology

Sewer basin delineations by trunk lines were created to aid in the proper assessment of the sewer surcharge to ensure costs reflect the actual share of costs that new upstream EDUs, as identified in the 2019 Housing Needs Analysis, would pay based on the downstream sanitary sewer capital improvements along the trunk lines the flows for their property would flow through.

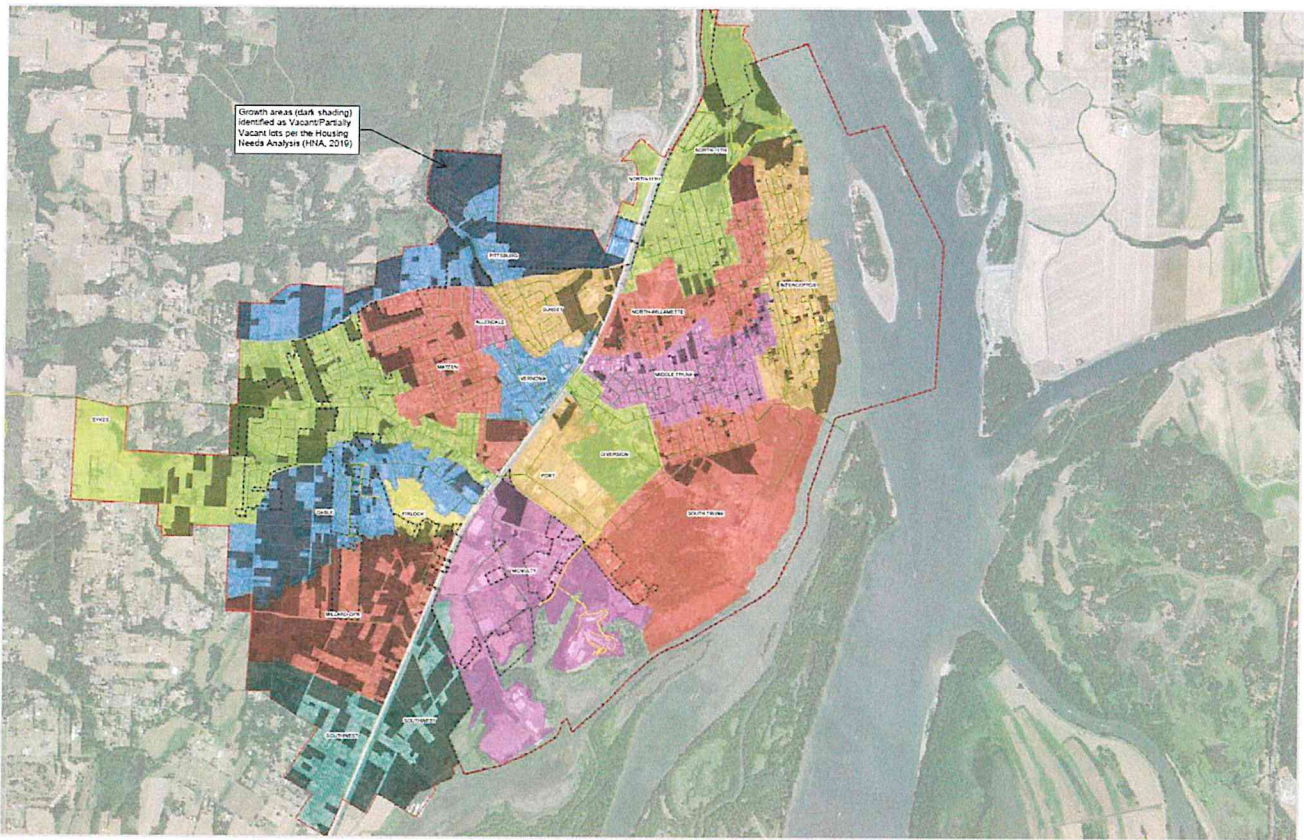


Figure 2.1.A St. Helens Sanitary Sewer Trunkline Basin Delineations

The delineation of CIP projects was simplified and where major portions of a Capital Improvement Project (CIP) spanned more than one basin, projects were split by basin. Basin delineation generally reflects existing conditions, except the Pittsburg basin, which is largely undeveloped and is anticipated to discharge to the North-11th basin.

Costs were calculated by summing CIP costs in and downstream of a basin and summing the EDUs in and upstream of the basin. The downstream CIP costs are then divided by the upstream EDUs. A sewer surcharge cap of \$15,000 per EDU is assumed.

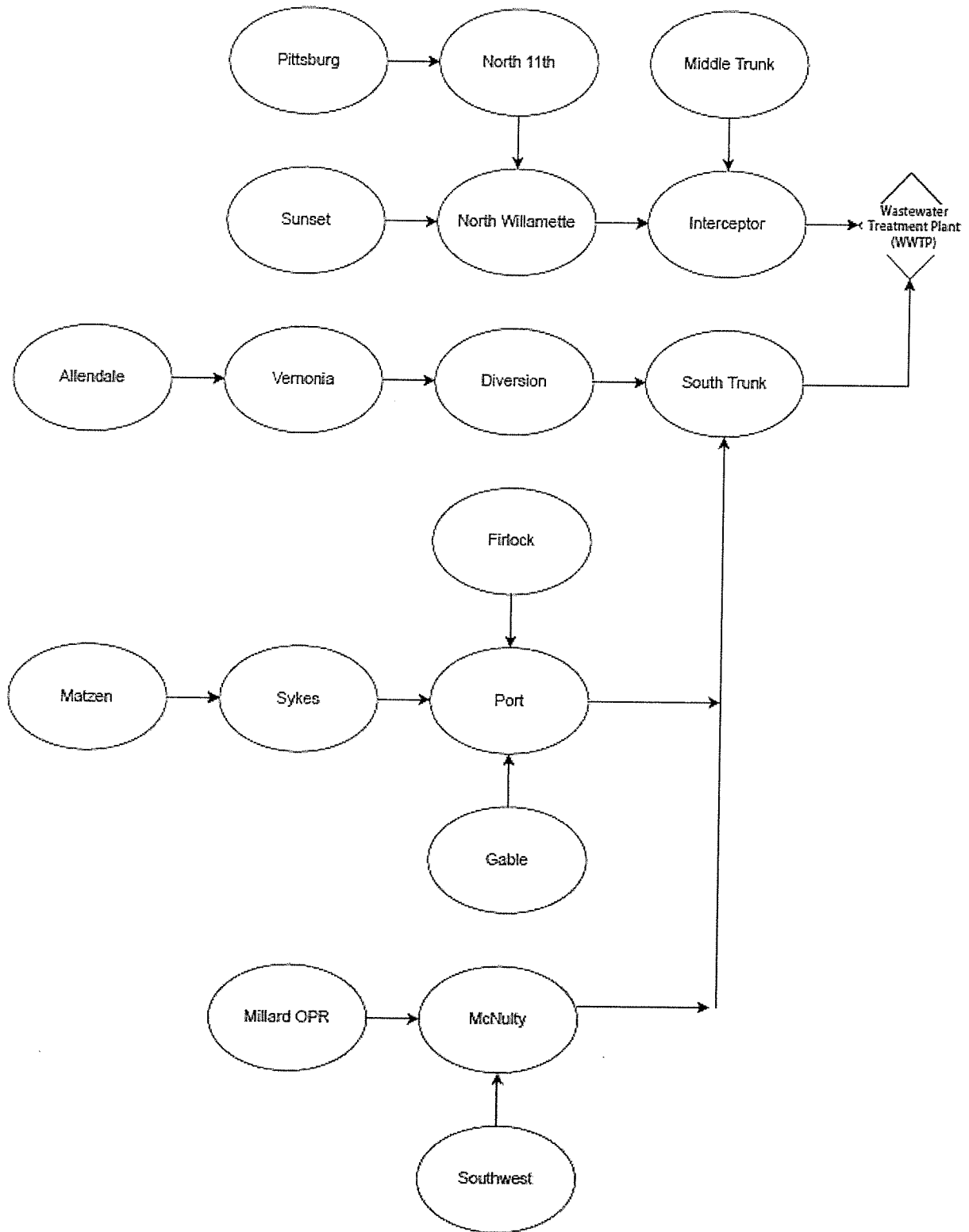


Figure 2.1.B St. Helens Sanitary Sewer Trunkline Basin Flow Paths

2.8 McNulty Sewer Basin

The McNulty sewer basin area has 144 new In-Basin EDUs.

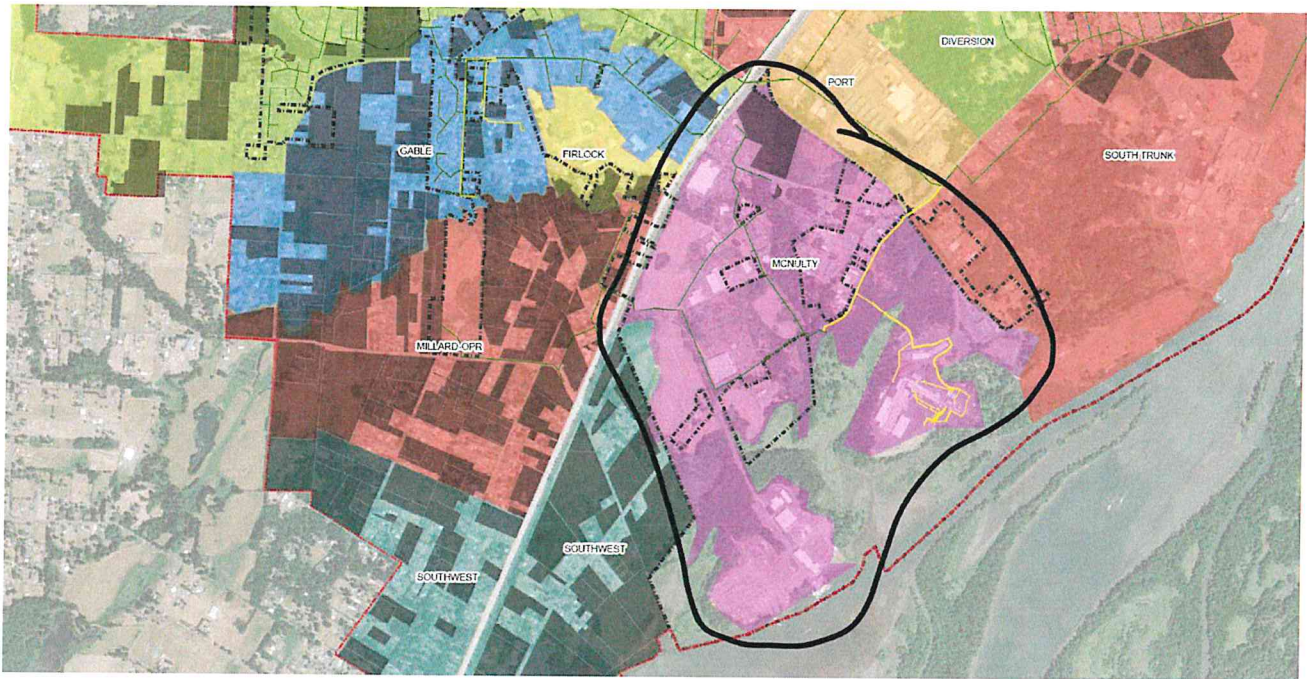


Figure 2.8.A McNulty Sanitary Sewer Basin

The allocation of the McNulty sewer basin's downstream CIP share per new upstream EDU, which consists of the McNulty and South Trunk basins, is \$3,200.

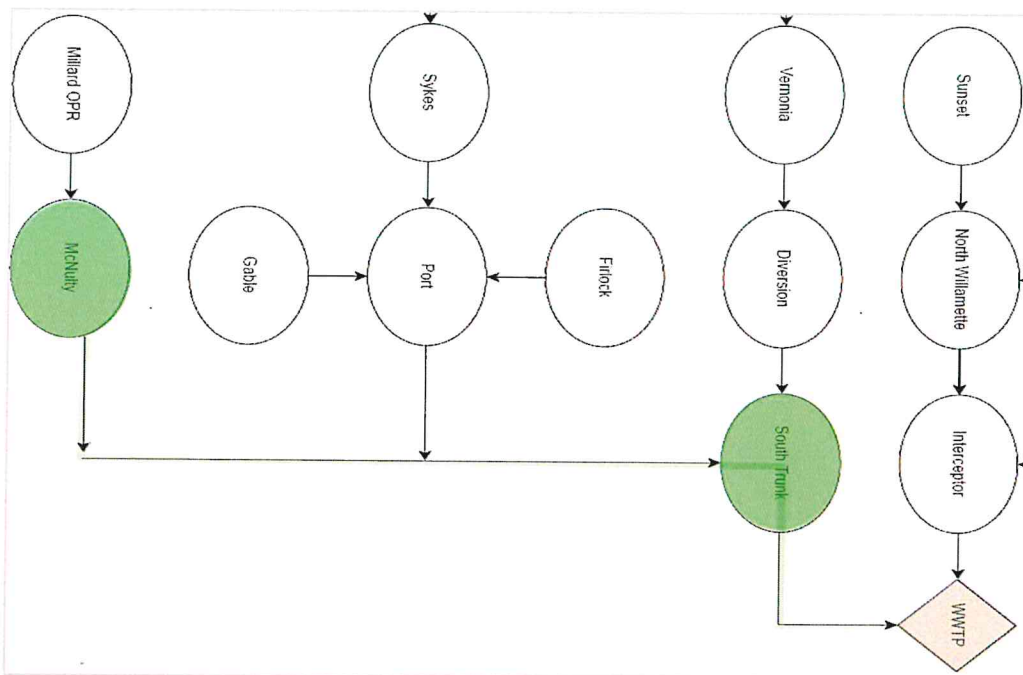


Figure 2.8.B McNulty Sewer Basin Flow Path to WWTP

SECTION 3 – SEWER SURCHARGE CHART

Sewer Trunkline Basin	Downstream CIP Share per New Upstream EDU	New-In Basin EDU	Sewer Surcharge per EDU*
Allendale	\$104,900	1	\$15,000 (max.)
Diversion	\$104,900	1	\$15,000 (max.)
Firlock	\$7,600	0	\$7,600
Gable	\$7,900	589	\$7,900
The Interceptor	\$2,200	512	\$2,200
Matzen	\$12,700	430	\$12,700
McNulty	\$3,200	144	\$3,200
Middle Trunk	\$41,400	91	\$15,000 (max.)
Millard-OPR	\$3,200	806	\$3,200
North 11th	\$3,400	340	\$3,400
North Willamette	\$2,200	134	\$2,200
Pittsburg	\$3,400	731	\$3,400
Port	\$3,800	36	\$3,800
South Trunk	\$1,800	124	\$1,800
Southwest	\$3,200	748	\$3,200
Sunset	\$7,900	321	\$7,900
Sykes	\$6,600	500	\$6,600
Vernonia	\$104,900	30	\$15,000 (max.)

* Estimated Sewer Surcharge cost per EDU is based on the US dollar at the time this document was published. Inflation adjustment to value at time of building permit issuance shall be included.

SECTION 4 – EQUIVALENT DWELLING UNIT CONVERSION

Land Use	EDU Conversion
Single Family Residential	1.00 EDU per unit
Multi Family (Duplex)	0.80 EDU per unit
Multi Family (3 or more Dwelling Units)	0.77 EDU per unit

Residential EDU conversion rate based on the City of St. Helens adopted Sewer Utility Rates and Charges.

EDU conversion rates for sewer surcharges for commercial, industrial, and other land uses not covered under Single Family Residential, Multi Family (Duplex), or Multi Family (3 or more Dwelling Units) shall be based on City of St. Helens wastewater rate classifications for water meter size(s),

3/4-inch meter	1.00 x Sewer Surcharge
1-inch meter	1.67 x Sewer Surcharge
1.5-inch meter	3.33 x Sewer Surcharge
2-inch meter	5.33 x Sewer Surcharge
3-inch meter	10.00 x Sewer Surcharge
4-inch meter	16.67 x Sewer Surcharge
6-inch meter	33.33 x Sewer Surcharge
8-inch meter	53.33 x Sewer Surcharge

**CCMH- Site Design Review
New Transitional Housing Facility
and campus infrastructure upgrades**

RECEIVED
AUG 22 2024
CITY OF ST. HELENS

Property Owner:
Columbia Community Mental Health
2195 Gable Road
St Helens, OR 97051

Subject Property:
Tax Lot 4109-BB-0300 – 2195 Gable Road, and 58646 McNulty Way
Formerly two tax lots
Tax Lot 4108-AD-0200 – 58646 McNulty Way, St Helens
Tax Lot 4109-BB-0300 – 2195 Gable Road, St Helens

Application for:

- **Similar Use - for an “Intermediate Care Facility”**
 - (similar to a “Residential Facility”).
- **Access Variance for an existing driveway.**
- **Conditional Use & Site Design Review**

Submittals:

- **Architectural Drawings (AKAAN)**
 - **SP-1 Architectural Site Plan**
 - **A1.1 Architectural Floor Plan**
 - **A 2.1 & A 2.2 Architectural Elevations**
- **Civil Drawings (Humber Design Group)**
 - **C0.50 Existing Conditions Plan**
 - **C1.00 Layout and Paving Plan**
 - **C2.00 Grading Plan**
- **Wetlands Delineation**
 - **Wetlands Report (Wetlands Solutions NW)**
 - **DSL Concurrence Letter (DSL)**
- **Transportation Generation Memo (Lancaster Mobley)**

Introduction

The proposed facility will serve as a transitional housing center for up to 16 displaced individuals. It will contain 16 sleeping rooms, a community room and staff offices. Individuals will have individual sleeping quarters with shared bathing, laundry, and dining areas. Whenever there are residents at

the facility it will be supervised by CCMH staff licensed per Oregon standards.

Temporarily the 16 sleeping rooms might not be fully occupied. Assuming this is the case CCMH may initially reserve eight (8) sleeping rooms for transitional housing quarters and may use the eight (8) other rooms for temporary offices for CCMH staff.

Improvements to City infrastructure will include half street frontage improvements to Gable Road along the entire property frontage to Riverfront Connector Plan standards including a curbed landscaped strip with street trees, curbed bicycle lane, pedestrian sidewalk as well as a center landscaped median with individual turning lanes at McNulty Way and CCMH's driveways.

Along with the proposed building CCMH will be constructing various campus upgrades including: a new potable water main, extend the existing fire water main to sprinkler the building and install new fire hydrants, enlarge the on-site sewage collection and pump system, install a new gas main, and install new underground electric and data infrastructure.

All of these infrastructure upgrades are in anticipation of future campus development to the west side of the property. Included in on the site plan in dashed lines are indicated potential building sites and potential parking areas. The current layout of the parking area and the infrastructure upgrades anticipates these potential future buildings; however any timeline and funding of these facilities is currently unknown and they are not part of this application.

Similar Use:

Under the city land use definitions, the facility will be an "Intermediate Care Facility" not a "Residential Facility" (at least in the short term) therefore we are applying for a determination of similar use to define the facility as an "Intermediate Care Facility" under city zoning definitions.

Without getting into the all the semantic subtleties, (which likely only health care professionals and health insurance claims adjusters fully understand) as a transitional housing facility the individuals that will initially be receiving services at the facility fall outside of the parameters defined by OHA under

ORS 443 for a “residential treatment facility”. Therefor the facility will not initially be licensed as a “Residential Care Facility” through OHA as city code requires under its “Residential Facility” definition. However, for all intents and purposes, the facility will function the same as a “Residential Facility”.

CCMH’s intent is that the facility will eventually be licensed as a residential facility per OHA’s criteria (or whenever OHA expands its definition of residential care to include the types of care that CCMH will be giving at this facility.)

To avoid the conundrum of definitions and semantics, we submit that the facility is an “Intermediate Care Facility” under city code (see definition below). The city’s definition of intermediate care facility appropriately describes this type of facility, but it avoids the “licensing conundrum” described above.

Access Variance:

CCMH has three (3) driveways: one (1) on McNulty Way and two (2) on Gable Road. One existing driveway on Gable Road serves the current proposed new building and the other existing driveway serves CCMH’s maintenance shop.

City Staff told CCMH that the existing shop driveway is too close to the neighbor’s driveway, and it must be abandoned unless the minimum separation distance of 200’ could be met.

CCMH has 16 properties that it maintains. The maintenance shop is where tools and materials are stored to carry out maintenance on all of CCMH’s properties. CCMH maintenance staff use the existing driveway and the maintenance shop on a daily basis.

CCMH would like to keep the existing driveway where it is. The existing driveway location allows direct access to the maintenance shop and direct entrance to the shop overhead doors.

For illustration purposes on the architectural site plan we have shown in dashed lines an alternate configuration to access the shop that could meet the driveway spacing standards, but that configuration is very awkward,

does not allow direct access into the overhead doors of the shop, and does not meet other driveway city standards (turning radius, and drive up / waiting space at the property line).

Narrative of relevant SHMC chapters.

17.32.040 Authorization of Similar Use

The SHMC defines a use titled “Intermediate Care Facility”.

“Intermediate care facility” means a facility which provides, on a regular basis, health-related care and services to individuals who do not require the degree of care and treatment which a hospital or skilled nursing facility is designated to provide, but who, because of their mental or physical condition, require care and services (above the level of room and board) which can be made available to them only through institutional facilities such as these. See “long-term care facility” and “nursing or convalescent home.”

However, “intermediate care facility” is not listed as an allowed use in any zone.

The zoning designation of the subject property is General Commercial (GC). The closest allowed use listed in the GC zone is a Residential Facility.

(y) Residential facility.

“Residential facility” means a residential care, residential training or residential treatment facility, as defined in and licensed by the Department of Human Services under ORS 443.400 through 443.455 or ORS 418.205 through 418.327, that provides residential care alone or in conjunction with treatment or training or a combination thereof for six to 16 individuals who need not be related. Staff persons required to meet licensing requirements shall not be counted in the number of facility residents, and need not be related to each other or to any resident of the residential facility.

ORS 443 addresses residential training and treatment related to mental, emotional, or behavioral disturbances or alcohol or drug dependence and ORS 418 specifically addresses child welfare services, the care of people under 21 years of age, including therapeutic, emotional, behavioral, and mental care.

This building is designed to provide transitional housing, counseling, and related services to displaced people in crisis. The assistance that will be provided to them does not fall within the strict definitions of ORS 443. Therefor the facility will not initially be licensed under the parameters defined by ORS 443. CCMH has plans to eventually add onto the building and provide the services listed under ORS 443 and have the facility fully licensed, but just not at this time.

The city's definition of "Intermediate Care Facility" is similar to its definition of "Residential Facility," it describes the services that will be provided at this facility and does not restrict the facility to only those services defined by ORS 443.

The crux of the problem is the narrow definitions in ORS 443 versus the types of services offered here. This facility will offer a broader range of services needed in Columbia County.

17.32.040 Unlisted use – Authorization of similar use.

(1) Purpose.

(a) It is not possible to contemplate all of the various uses which will be compatible within a zoning district. Therefore, unintentional omissions occur.

(b) The purpose of these provisions is to establish a procedure for determining whether certain specific uses would have been permitted in a zoning district had they been contemplated and whether such unlisted uses are compatible with the listed uses.

We submit that "intermediate care facility" is similar to "residential facility" which is allowed in the GC zone.

(2) Administration. The director shall maintain a list by zoning district of approved unlisted uses and the list shall have the same effect as an amendment to the use provisions of the applicable zone.

(3) Limitation.

(a) The director shall not authorize an unlisted use in a zoning district if the use is specifically listed in another zone as either a permitted use or a conditional use.

"Intermediate Care Facility" is not listed as an allowed use in any other zone in the City of St Helens.

(b) The director shall only authorize a residential use that has on-site staff providing residential care, treatment, or training as defined in ORS 443.400 if the use is licensed or certified by a state agency to operate in Oregon prior to final occupancy.

CCMH will have Oregon certified staff at the facility. This paragraph creates a bit of a catch 22 because the care provided at this facility falls outside of the parameters or ORS 443 and will not be initially licensed

under ORS 443. However, there is no remedy to this conundrum anywhere in the SHMC, a similar use determination is the only available method outlined in the SHMC, see “17.32.040 (1)” above.

(c) The decision of the director may be appealed in accordance with SHMC 17.24.290.

Not applicable at this time.

(4) Approval Standards. Approval or denial of an unlisted use application by the director shall be based on findings that:

(a) The use is consistent with the comprehensive plan;

We submit that because “intermediate care facility” is specifically defined in the zoning ordinance it is consistent with the intent of the comprehensive plan and zoning ordinance, it was simply left out when uses were assigned to specific zones.

(b) The use is consistent with the intent and purpose of the applicable zoning district;

We submit that “intermediate care facility” is consistent with the intent of the zoning district. The use will be almost identical to that described as a “residential facility” the only difference will be that because of the restrictions inherent in ORS 443, it will not be initially licensed under ORS 443.

(c) The use is similar to and of the same general type as the uses listed in the zoning district;

The use and the spaces in the building are basically identical to that described as a “residential facility” which is an allowed use in the zoning district.

(d) The use has similar intensity, density, and off-site impacts as the uses listed in the zoning district; and

Yes, the occupancy of the building is basically identical to an allowed use in the zone. Compared to other uses allowed in the zoning district, like movie theaters, gas stations, shopping centers etc., the intensity of this use will be much lower in terms of traffic, utilities, and other services.

(e) The use has similar impacts on the community facilities as the listed uses. (Ord. 3032 § 1(3), 2007; Ord. 2875 § 1.080.040, 2003)

Same response as (d) above.

17.32.110 General Commercial (GC)

(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):

(l) Offices – all.

“Office” means a room or group of rooms used for conducting the affairs of a business, profession, service, industry, or government.

(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:

(y) Residential facility.

“Residential facility” means a residential care, residential training or residential treatment facility, as defined in and licensed by the Department of Human Services under ORS 443.400 through 443.455 or ORS 418.205 through 418.327, that provides residential care alone or in conjunction with treatment or training or a combination thereof for six to 16 individuals who need not be related. Staff persons required to meet licensing requirements shall not be counted in the number of facility residents, and need not be related to each other or to any resident of the residential facility.

Similar Use (see above) (defined in zoning code but not assigned to any zone)

“Intermediate care facility” means a facility which provides, on a regular basis, health-related care and services to individuals who do not require the degree of care and treatment which a hospital or skilled nursing facility is designated to provide, but who, because of their mental or physical condition, require care and services (above the level of room and board) which can be made available to them only through institutional facilities such as these. See “long-term care facility” and “nursing or convalescent home.”

(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](#).

Proposed building height +/- 24'

(b) Outdoor storage abutting or facing a lot in a residential zone shall comply with Chapter [17.72](#) SHMC.

Not applicable no abutting residential zones.

(c) The maximum lot coverage including all impervious surfaces shall be 90 percent.

Property area 431279 sq. ft.

Existing Improvements

Existing Buildings:

Main building	20,500
Modular 1	2500
Modular 2	1500
Modular 3	550
Crisis Center	1400
Shop	605
Storage Sheds	105+175+205 = 485
(behind main building)	

Paved Areas

Existing Paved Area	79,992 sq. ft.
Existing Concrete	5,228 sq. ft.
(walkways etc.)	

Total existing impervious surfaces: 27,540 sq. ft.

Existing Lot Coverage $27540 / 431279 = 6.3 \%$

New Facility & related improvements

New Building	5800 sq. ft.
New Paved Areas	16,245 sq. ft.
New Concrete	2,297 sq. ft.

Lot Coverage with New improvements = 51,882

New Lot Coverage $51,882 / 431279 = 12 \%$

(d) Multi-dwelling units must comply with AR standards and other applicable sections of this code.

Not applicable

(e) The minimum landscaping shall be 10 percent of the gross land area associated with the use.

The property is a campus setting, some areas are natural areas and wetland areas, other areas adjacent to buildings are more “formally landscaped”. It will be the same with this new building, areas adjacent to the building and parking lot will be formally landscaped, and areas not adjacent to the building will be left as natural areas. As noted above the total lot coverage (all impervious areas) is only 12%. In this kind of setting the remainder, or 88%, is either formally landscaped or left as naturally landscaped areas.

17.40 (wetlands):

City of St Helens has determined that there are no significant City wetlands on the property.

CCMH has performed a wetlands delineation survey (see attached). The wetlands delineation has been concurred with by the Oregon Department of State Lands (DSL) concurrence letter attached. The wetland is identified on the site plan drawings. The wetland abuts and encroaches into the Gable Road ROW near the intersection of McNulty Way.

CCMH will be required to acquire a wetlands permit from DSL prior to any work or construction of that portion of the city right of way along Gable Road or in any other areas that may affect the designated wetlands.

17.46 (floodplain): Not applicable. The proposed area is outside of any floodplain.

17.72 (landscaping & buffering):

Landscaping & Street Trees

On the south side of Gable Road there are existing overhead utility lines (telecom). The site plan shows street trees along Gable Road, small stature street trees will be required. CCMH will select small stature trees for from City of St Helens Street tree list for approval when Right of Way engineering drawings are submitted for permit.

Per direction from City Staff, along the portion of Gable Road where the wetlands encroach into the ROW, street trees will be eliminated, and the

shared pedestrian / bicycle path shall be curb tight. City Staff recommended and will allow the wetlands to serve as the street trees and landscaping in this area. (Similar to what the City did at the improvements to Columbia Blvd between Gable Road and Sykes Road.) Any disturbance to the wetlands will be restored per DSL requirements (see wetlands above).

17.72.070 Buffering and screening

Buffering provisions mandate buffer areas are maintained when different zones abutting each other.

17.72.130 Buffer matrix.

The property is General Commercial (GC), abutting properties are Light Industrial (LI) which requires a min. 10' buffer to adjacent LI properties.

The proposed building is approximately 165' away from the closest property line and no work is anticipated along the property line. The area along the property line has existing trees that will not be disturbed.

Screening of Parking Lots

The parking lot will be landscaped with a mix of groundcover, shrubs, and trees. Per city requirements tree islands will be constructed at a ratio of (1) tree island per (7) parking spaces. The site plan shows the general concept of the landscape, a specific landscape plan will be provided to the city for permit approval.

Screening of Service Facilities:

Gas meters and HVAC units and any storage or garbage areas will be screened per city code, specifics will be provided to the city as part of the plans submitted for permit approval.

There will be other landscaping associated with the building for the privacy of the residential rooms and in landscaped area around the building, the site plan shows the general landscaping areas, specific plans will be submitted for building permit.

17.76 (vision clearance):

Gable Road has a Minor Arterial classification so 35' vision triangle will be maintained for the ROW modifications to the existing driveways.

17.80 Off-Street Parking & Loading

Parking Analysis:

The property works as a campus where the parking lots are shared between all the buildings. Below are listed the amount required parking spaces per previous land use decisions.

Existing Parking

2004 Main Building:	82 spaces required (per 2004 as-built drawings)
2017 First Modular Building installed:	22 additional spaces required
2018 Additional Modulares installed:	17 additional spaces required
2021 Crisis Center Building	3 spaces*

* no land use documentation found for crisis center, number based on a practical layout of the existing graveled area.

Parking for Existing buildings	124 Spaces
--------------------------------	------------

Parking - Current proposal

Per SHMC parking requirements there are three (3) possible interpretations for this development:

- (1) Residential.
 - (d) Group care – One space per three residential beds plus one space for each employee on largest shift.
- or
- (2) Civic.
 - (f) Long-term care facility, nursing home – one space for every four rooms.

Option 1: Residential Group Care:

Sixteen (16) residential beds = (6) parking spaces and four (4) CCMH staff offices = (4) parking spaces for a total of ten (10) required parking spaces.

Option 2 Civic – Long Term Care

16 patient rooms = 4 parking spaces required

Option 3 Short Term: 8 patient rooms (2 spaces) + 12 Staff = 14 spaces

The most restrictive interpretation would be 14 required parking spaces.

124 existing required spaces + 14 required new spaces = 138 total required spaces.

Proposed Site Plan shows 149 (11 surplus) parking spaces.

Parking Requirement is met.

Carpool Spaces: 5% of new required spaces required to be car pool spaces, Minimum new car pool spaces = 1. One (1) carpool space will be designated on the permit plans.

Bicycle Parking required to be 10% of new required spaces. 1 bicycle space required based on (10) required new parking spaces (see above). A bicycle space will be designated on the permit plans.

17.84 Access Variance

CCMH has 838 feet of frontage along Gable Road. CCMH has two existing driveways along Gable Road. One paved driveway that accesses the main part of the campus. The second existing driveway accesses the CCMH's shop, from which CCMH personnel maintain all CCMH's properties.

Gable Road is a designated minor arterial with minimum 200' distance between access points (per SHMC Table 17.84.040-2). Conceptually CCMH's 838' of frontage could be rearranged so that the campus has three (3) access points along Gable Road all meeting the minimum access distance of 200', however the proposal is simply to use and improve the two (2) existing access points.

With all the public improvements along Gable Road, including a landscape strip, a protected bike lane and sidewalk there will be a vast improvement to pedestrian safety along Gable Road.

The existing paved driveway to the main portion of the campus is 54' wide where it fronts Gable Road. This driveway will be narrowed to a city

standard 30' wide per SHMC 17.84.080 Figure 17. The other existing driveway to the maintenance building is 32' wide and it will also be narrowed to the city's standard 30' width.

The two (2) existing driveways are 261 feet from one another meeting the minimum separation distance of 200' per SHMC 17.84.080 Figure 16.

However, the existing shop driveway is less than 200' to the neighbor's existing driveway, does not meet city spacing standards because (See architectural site plan). The distance from the center of the existing shop driveway to center of the neighbor's three-lot driveway (center of neighbor's flag lot) is 151 feet.

Although the driveway could be shifted and meet the 200' spacing standard doing so creates a very awkward configuration. We have shown on the site plan in dashed lines a potential configuration, but that configuration does not meet city turning radius and waiting / queuing depth standards at the property line and shifting the driveway does not allow direct access to the shop's overhead garage door.

For the above practical reasons CCMH requests to keep the existing driveway where it is.

The other option to access the shop would be to build a new driveway to the shop, crossing almost one-third of CCMH's property (approximately 320'). Or CCMH could build or rent a different shop facility elsewhere. These options are not preferred.

City Staff pointed to SHMC section 17.84.110 to support the request to move the driveway.

17.84.110 Director's authority to restrict access.

(1) In order to provide for increased traffic movement on congested streets and to eliminate turning movement problems, the director may restrict the location of driveways on streets and require the location of driveways be placed on adjacent streets, upon the finding that the proposed access would:

(a) Cause or increase existing hazardous traffic conditions; or

Response: Admittedly Gable Road is a high traffic road and without any sidewalks Gable Road is precarious for pedestrians. However, CCMH is required to improve the entire frontage of their property to Riverfront Connector Plan Standards. Those standards include a landscape strip, a bicycle path, a sidewalk, as well as a center landscape median strip which further restricts automobile turning movements.

Contrary to increasing hazardous traffic conditions, with the improvements to Gable Road CCMH will be decreasing hazardous traffic conditions, especially for pedestrians that will be protected by curbed landscape strip, including street trees, and a curbed bicycle path.

(b) Provide inadequate access for emergency vehicles; or

Response: The above-mentioned Riverfront Connector Plan Standards account for emergency vehicle access. Both access points will be reconstructed to city standards.

(c) Cause hazardous conditions to exist which would constitute a clear and present danger to the public health, safety, and general welfare.

Response: Rather than causing hazardous conditions to exist, as stated in the response to item (a) above, all the improvements that CCMH will be building will greatly reduce the hazards that currently exist along Gable Road.

17.84.150 Approval standards.

The commission may approve, approve with conditions, or deny a request for an access variance based on findings that:

(1) It is not possible to share access;

Response: Moving the driveway is not a practical solution, by shifting the existing driveway 50' to the west eliminates direct access to the shop's overhead door, creates an awkward layout for revised access and parking at the and does not meet other access standards. CCMH does not want to have to build a new driveway to the shop, crossing almost one-third of their property (approximately 320'), nor build or rent a different shop facility elsewhere.

(2) There are no other alternative access points on the street in question or from another street;

The existing shop is at the far east of the property, as stated above shifting the driveway to the west eliminates direct access to the shop's overhead door, makes for awkward turning, awkward parking layout, and does will not meet other turning radius or queuing standards. In order to use a different access point CCMH would have to build a driveway across about 1/3 of their property.

(3) The access separation requirements cannot be met;

As discussed, separation could theoretically be met but doing so makes for an awkward layout that would not meet other driveway rules like queuing and turning radius standards, and eliminated direct access to the shop's main overhead door.

(4) There are unique or special conditions that make strict application of the standards impractical;

The above describes the problem. The driveway could be shifted but doing so eliminates direct access to the shop's overhead door and breaks other standards related to turning radius, and queuing at the property line.

(5) No engineering or construction solutions can be applied to mitigate the condition;

The condition of Gable Road is this - it is a high-speed, high-volume road and other than asphalt travel lanes it has no other improvements. Pedestrians have to walk on the unimproved shoulder with no protection from straying vehicles.

CCMH will mitigate the above condition. CCMH will improve the entire frontage of their property to Riverfront Connector Plan Standards. Those standards include a curbed landscape strip, a curbed bicycle path, a sidewalk, and a center median strips restricting automobile turning movements. With all these improvements CCMH is greatly decreasing hazardous traffic conditions.

(6) The request is the minimum variance required to provide adequate access;

This is the minimum. CCMH is simply asking to keep the two access points that currently exist. These two access points will be upgraded to city

standards, the only exception to which will be the distance to the neighbors existing driveway.

(7) The approved access or access approved with conditions will result in a safe access and will not result in the degradation of operational and safety integrity of the transportation system;

The existing driveway access points will be brought up to city standards. Contrary to degrading the city's transportation system, with all the required street frontage improvements CCMH will be greatly improving operational and safety integrity of Gable Road.

(8) The visual clearance requirements of Chapter 17.76 SHMC will be met; and

The visual clearance requirements will be met.

(9) No variance shall be granted where such hardship is self-created. (Ord. 3189 § 2 (Att. A), 2015; Ord. 3150 § 3 (Att. B), 2011; Ord. 2875 § 1.116.150, 2003)

This hardship is not self-created. The proposal is to use and improve the existing driveways. The existing driveways and neighboring property lot configurations were created many decades ago

17.88 (signs):

Not applicable, CCMH is not applying for a sign with this proposal.

17.96 (Site Design Review)

17.96.180 Approval standards.

Many of the Site Design review approval standards relate to Residential Multifamily development. This narrative only addresses those which are applicable to this commercial development

17.96.180(1) To our knowledge all applicable chapters of the development code have been addressed.

17.96.180(2) The buildings have been located to conform to existing topography, the area is not subject to slumping or sliding, as a campus setting there is ample distance between buildings for light and air, the parking and drive lanes are designed to accommodate emergency vehicles.

All trees greater than 6" dbh have been identified and will be either preserved or replaced with new plantings.

(3) refers to residential projects, not applicable

(4) buffering & screening is addressed 17.72 above

(5), (6), & (7) refer to residential projects, not applicable

(8) The site plan demarcates different areas with different techniques, curbs, landscaping, level changes. Additional techniques will be incorporated into the design as the design progresses and submitted and reviewed during the building permit process.

(9) Crime Prevention & Safety. All of the criteria listed in this section are reviewed during the building permit process and will be reviewed by the city at that time.

(10) The site has been designed with consideration to the existing driveways and access points, it has been designed to accommodate emergency vehicles and contains separate pedestrian paths and clearly identified crosswalks where pedestrian paths and vehicular paths converge.

(11) refers to residential projects, not applicable

(12) parking is addressed in 17.80 above

(13) The project is a campus setting with naturally landscaped areas and more formally landscaped areas near the buildings and parking areas. Specific landscape plans that comply with 17.72 will be provided for approval during the building permit process.

(14) Submitted with this application is a preliminary grading plan prepared by a licensed civil engineer that complies with the city's grading and stormwater engineering guidelines. Final grading and stormwater plans will be submitted for approval during the building permit process.

(15) The project will be designed to the most recently adopted ADA standards.

(16) If CCMH decides to install a sign a separate application will be submitted per 17.88.

(17) To our knowledge all applicable chapters of the development code have been addressed.

17.100 40 (Conditional Use Approval Standards):

(1) The planning commission shall approve, approve with conditions, or deny an application for a conditional use or to enlarge or alter a conditional use based on findings of fact with respect to each of the following criteria:

- (a) The site size and dimensions provide adequate area for the needs of the proposed use;
- (b) The characteristics of the site are suitable for the proposed use considering size, shape, location, topography, and natural features;
- (c) All required public facilities have adequate capacity to serve the proposal;
- (d) The applicable requirements of the zoning district are met except as modified by this chapter;
- (e) The supplementary requirements set forth in Chapter 17.88 SHMC, Signs; and Chapter 17.96 SHMC, Site Development Review, if applicable, are met; and
- (f) The use will comply with the applicable policies of the comprehensive plan.

- (a) & (ab) The size, dimensions, and characteristics of the site are adequate and suitable for the proposed use.
- (c) Based on discussions with city staff, public facilities are adequate. Existing connections to public facilities will be upgraded and on-site campus facilities enhanced for long-term campus upgrades.
- (d) With the similar use determination (see above) the zoning requirements are met.
- (e) See above regarding 17.88, all requirements for site design review 17.96 have been submitted with this application.

17.108 (variance):

Not applicable, except access variance addressed above.

17.132 tree removal:

Included in the application is an existing conditions survey which identifies all trees on the property larger than 6" in diameter.

The proposed building and parking lot are in an area of the property where there are few trees. One ornamental maple tree 7" in diameter will be removed (north part of building). One oak tree 16" in diameter will be removed (west side of parking lot). A 66" redwood (south of building) will remain and will be protected during construction.

Multiple trees (not counting required street trees and parking lot trees) will be planted as part of the building landscaping far in excess of city requirements for replacement trees of the removed trees. (see site plan).

Trees in wetlands area along Gable Road:

Because the street section has not yet been designed it is unknown at this time how many trees will be affected in the area where the wetlands is in the city ROW adjacent to Gable Road. Regardless, because the wetland survey has already been performed and acknowledged by DSL any trees that are affected in that area will have to be mitigated per DSL standards. Part of the wetlands mitigation plan will include a planting plan, including trees.

17.152 (streets/utilities):

The drawings show the proposed Right of Way improvements. The proposed improvements follow the City of St Helens Riverfront Connector Plan design guidelines with a landscape strip, and a protected a bicycle lane and sidewalk. The only exception to the above is the area of the ROW where the northern portion of the wetlands encroaches into the ROW. Per city staff direction a curb-tight 12' wide shared bicycle / pedestrian way is proposed so as to protect the wetlands as much as possible. Even with this reduction some of the wetlands that encroach on the right of way will be affected. CCMH will be required to go through DLS's (and possibly the Corps of Engineer's) permit processes to perform work in the wetlands. Any disturbed wetlands will be restored to DSL standards, and if required, other wetland improvements will be performed to mitigate lost wetlands where the street improvements are performed.

17.156 Traffic Impact Analysis (TIA):

When the property was rezoned the City Council stipulated a “trip-cap” on the property, with a total maximum additional trips of 700 trips per day. (ORD No. 3297).

Included in the application (attached) is a trip generation memo from Jennifer Danziger, Senior Transportation Engineer from Lancaster Mobley. Per Ms. Danziger’s calculations, trip generation is estimated at no more than 4 peak hour trips or 44 daily trips per day, significantly lower than the 700 daily trips imposed by ORD No. 3297.

See attached trip generation memo.



1130 SW Morrison St., Suite 318
Portland, OR 97205
503.248.0313
lancastermoble.com

Memorandum

To: Jenny Dimsho, City of St. Helens
Copy: Al Peterson, AKAAN
From: Myla Cross
Jennifer Danziger, PE
Date: August 2, 2024
Subject: Columbia Community Mental Health – New Facility
Trip Generation Memorandum



RENEWS: 12/31/2025

Introduction

Columbia Community Mental Health (CCMH) is proposing a new building on their site located at 2195 Gable Road in St. Helens, OR. The 5,600-square foot (SF) building will include transitional housing for individuals in crisis and office space.

The purpose of this memorandum is to examine the estimated trip generation of the proposed development and provide a comparison with trip cap established with the rezoning of the site from Light Industrial (LI) to General Commercial (GC) in 2023.

Project Description & Location

The project site (Map No.4109-BB Tax Lot 300) encompasses approximately 9.84 acres and is located south of Gable Road and east of McNulty Way. The subject property was originally two parcels (Tax Lots 200 & 300) but has since been consolidated into a single parcel owned by CCMH. The existing main CCMH office is located on the southern portion of the site and the proposed 5,600 SF building will be the first phase of expansion for CCMH.

The proposed 5,600 SF building will ultimately have 16 residential rooms, intended to be used for transitional housing, and 4 offices for CCMH staff. However, upon opening there will be an interim scenario with 8 residential rooms with the remainder of the space used for offices.

An aerial view of the proposed site and the nearby vicinity is displayed in Figure 1 on the following page. The subject site is shown outlined in yellow. A site plan is attached.



Figure 1: Aerial Photo of Site Vicinity (Image from Columbia County Web Map)

Trip Generation

To estimate the number of trips that could be generated by the proposed development, trip rates from the *Trip Generation Manual*¹ were used. Data from the land use code (LUC) 253, Congregate Care Facility, and LUC 710, General Office, are used to estimate the proposed site's trip generation based on the number of dwelling units and the square footage of the gross floor area, respectively.

Because there is not a specific land use code in the *Trip Generation Manual* for transitional housing, three land use codes were considered. LUC 253, Congregate Care Facility was selected as the most appropriate alternative as opposed to LUC 254, Assisted Living, or LUC 620, Nursing Home, because residents will not require as much personal or medical assistance.

As described in the *Project Description & Location*, the facility will ultimately have 16 residential units but will open with 8 units. The following trip generation scenarios were analyzed:

- **Interim Scenario:** 8 residential rooms & 2,100 SF of office
- **Long-Range Scenario:** 16 residential rooms & 800 SF of office

The resulting trip generation estimates for the interim and long-range scenarios are summarized in Table 1. Detailed trip generation calculations are included in the appendix.

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

Table 1: Trip Generation Estimates

ITE Code	Intensity	Morning Peak Hour			Evening Peak Hour			Daily Trips
		In	Out	Total	In	Out	Total	
Interim Scenario								
710 - General Office Building	2.1 KSF	3	0	3	1	2	3	22
253 - Congregate Care Facility	8 DU	1	0	1	0	1	1	18
Total		4	0	4	1	3	4	40
Long-Range Scenario								
710 - General Office Building	0.8 KSF	1	0	1	0	1	1	8
253 - Congregate Care Facility	16 DU	1	0	1	1	2	3	36
Total		2	0	2	1	3	4	44

KSF = 1,000 square feet

As shown in Table 1, the trip generation is estimated at 4 morning peak hour, 4 evening peak hour, and 40 weekday trips under the interim scenario. With the long-range scenario, trip generation is estimated at 2 morning peak hour, 4 evening peak hour, and 44 weekday trips. The long-range scenario generates more daily trips than the interim scenario and should be used for the trip accounting analysis.

Trip Accounting Analysis

With the rezoning of 5.67 acres of Tax Lot 300, a trip cap of 1,107 new daily trips was established. The proposed 5,600 SF residential and office building will be the first development application since the rezoning and lot consolidation occurred. Table 3 summarizes the remaining trips vested in Tax Lot 300 following approval of the proposed development application under the long-range plan

Table 2: Trip Accounting Summary

Development Phase	Daily Trips
Tax Lot 300 Trip Cap	1,107
Phase 1 – 5,600 SF Residential & Office Building	44
Remaining Trips	1,063

The proposed development falls well below the site’s trip cap. After accounting for the proposed development of 5,600-SF building, the site can accommodate future development generating up to 1,063 daily trips.



Traffic Impact Study Criteria

St. Helen's Community Development Code (CDC) Section, 17.156.030, establishes the criteria for when a traffic impact study is required. The criteria are listed below with responses following in *italics*.

- (1) A change in zoning or a comprehensive plan amendment designation, except when the change will result in a zone or plan designation that will result in less vehicle trips based on permitted uses (e.g., from a high density residential district to a lower density residential district or from a commercial district to a residential district);

No zone change or comprehensive plan amendment is proposed.

- (2) The site proposes to take access on Highway 30 or on an approach to Highway 30; or

Site access will be taken from Gable Road.

- (3) The development shall cause one or more of the following effects, which can be determined by field counts, site observation, traffic impact analysis or study, field measurements, crash history, Institute of Transportation Engineers Trip Generation, and information and studies provided by the local reviewing jurisdiction(s) and/or ODOT:

- (a) The proposed action is estimated to generate 2501 average daily trips (ADT) or more or 25 or more weekday a.m. or p.m. peak hour trips (or as required by the city engineer);

Trip generation is estimated at no more than 4 peak hour trips or 44 daily trips.

- (b) The proposed action is projected to further degrade mobility at the Deer Island Road/Highway 30, Pittsburg Road/Highway 30, Wyeth Street/Highway 30, Gable Road/Highway 30, or Millard Road/Highway 30 intersections;

Due to the low anticipated trip generation, the site is not projected to further degrade any of the specified intersections.

- (c) An increase in use of adjacent streets by vehicles exceeding the 20,000 pound gross vehicle weights by 10 vehicles or more per day;

The proposal will not be a significant generator of truck trips.

- (d) The location of the access driveway does not meet minimum intersection sight distance requirements, or is located where vehicles entering or leaving the property are restricted, or such vehicles queue or hesitate, creating a safety hazard;

The proposal will use the existing access which appears to have adequate sight distance for a 40-mph roadway.

- (e) The location of the access driveway does not meet the access spacing standard of the roadway on which the driveway is located; or

The proposal will use the existing access on Gable Road which meets spacing standards.



- (f) A change in internal traffic patterns that may cause safety problems, such as backup onto the highway or traffic crashes in the approach area. (Ord. 3150 § 3 (Att. B), 2011)

The proposal is not anticipated to cause safety problems due to internal traffic flow patterns.

Based on this assessment, a traffic impact study is not required.

Conclusions

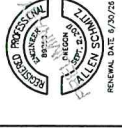
The proposed development is estimated to generate no more than 4 peak hour trips or 44 daily trips, which falls well below the site's trip cap. After accounting for the proposed development of 5,600-SF building, the site can accommodate future development generating up to 1,063 daily trips. No additional traffic analysis required.

Attachments:

Site Plan

Trip Generation





PROJECT TEAM
 CHAIRMAN: ALLEN S. KALKAN, P.E.
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 P: 503.366.3050
 REGISTERED ENGINEER
 PROFESSIONAL ENGINEERS
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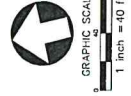
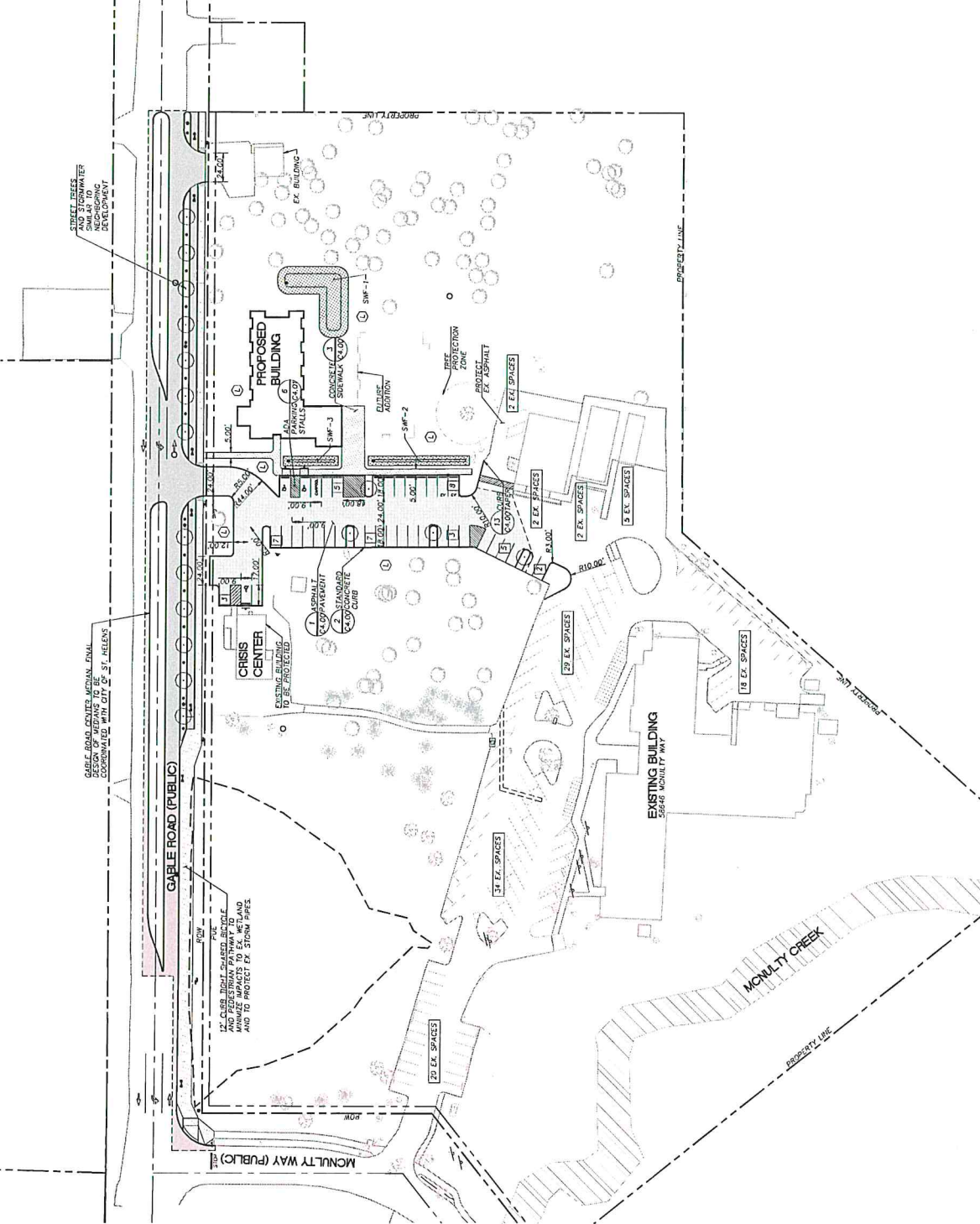
CCMH - NEW FACILITY
 Columbia Community Mental Health
 5666 MCNULTY WAY
 ST HELENS, OREGON 97051

SCALE: 1" = 40'
 DRAWN BY: J. HARRIS
 CHECKED BY: J. HARRIS
 DATE: 07/14/2018
 REVISIONS:
 A DATE: 07/14/2018
 BY: J. HARRIS

C1.00
 LAYOUT AND PAVING PLAN
 SHEET NO.

SHEET LEGEND

[Symbol]	PRIVATE ASPHALT PAVEMENT	SEE D1.1 SHEET C4.00
[Symbol]	PRIVATE CONCRETE SIDEWALK	SEE D1.3 SHEET C4.00
[Symbol]	PRIVATE CONCRETE PAVEMENT	SEE D1.2 SHEET C4.00
[Symbol]	PUBLIC ASPHALT PAVEMENT	
[Symbol]	PUBLIC CONCRETE SIDEWALK	
[Symbol]	PUBLIC CONCRETE PAVEMENT	
[Symbol]	STORMWATER POND	SEE D1.1 SHEET C4.01
[Symbol]	LANDSCAPING	SEE LANDSCAPE PLANS
[Symbol]	STANDARD CURB	SEE D1.2 SHEET C4.00
[Symbol]	WHEEL STOP	SEE D1.5 SHEET C4.00



LAYOUT AND PAVING PLAN
 SCALE: 1" = 40'

PROJECT TEAM
 CMR ENGINEER
 HANSEN DESIGN GROUP, INC.
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 MUEHLBACH ENGINEERS
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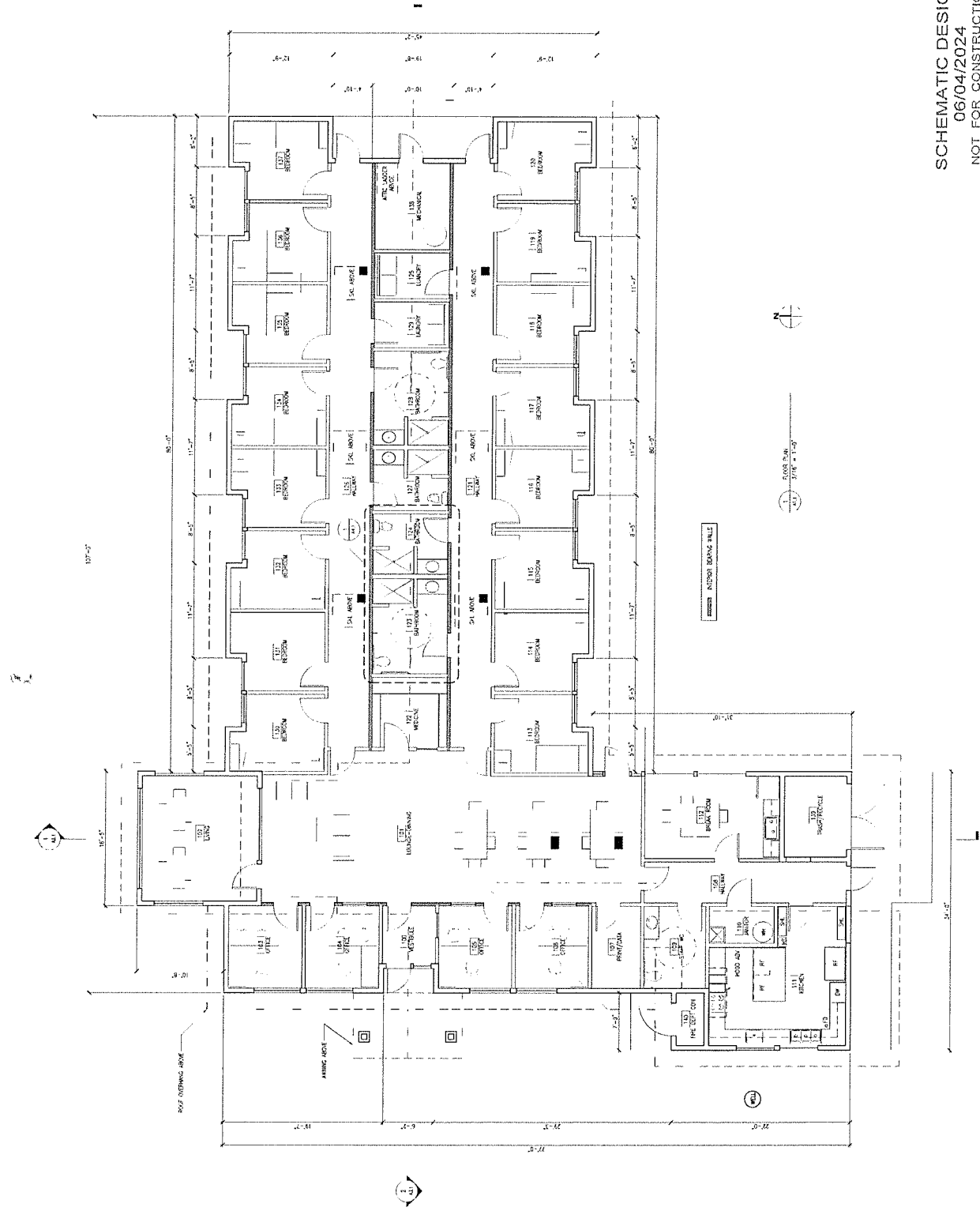
CMH - NEW FACILITY
 Columbia Community Medical Health
 3958 KANAWAY AVE
 ST HELENS, OREGON 97151

AS NOTED
 SCALE BY: UNCHANGED
 DATE: 17th JAN
 SHEET NO: 17th JAN
 DRAWN BY: 17th JAN
 CHECKED BY: 17th JAN
 DATE: 17th JAN

CONTENTS
FLOOR PLAN
 SHEET NO:

A1.1

SCHEMATIC DESIGN
 06/04/2024
 NOT FOR CONSTRUCTION





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

Land Use: General Office Building
Land Use Code: 710
Land Use Subcategory: All Sites
Setting/Location: General Urban/Suburban
Variable: 1000 SF GFA
Trip Type: Vehicle
Formula Type: Rate
Variable Quantity: 2.1

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

AM PEAK HOUR

Trip Rate: 1.52

	Enter	Exit	Total
Directional Split	88%	12%	
Trip Ends	3	0	3

PM PEAK HOUR

Trip Rate: 1.44

	Enter	Exit	Total
Directional Split	17%	83%	
Trip Ends	1	2	3

WEEKDAY

Trip Rate: 10.84

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	11	11	22

SATURDAY

Trip Rate: 2.21

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	2	2	4



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

Land Use: Congregate Care Facility
Land Use Code: 253
Land Use Subcategory: All Sites
Setting/Location: General Urban/Suburban
Variable: Dwelling Units
Trip Type: Vehicle
Variable Quantity: **8**

AM PEAK HOUR

Trip Rate: 0.08

	Enter	Exit	Total
Directional Split	58%	42%	
Trip Ends	1	0	1

PM PEAK HOUR

Trip Rate: 0.18

	Enter	Exit	Total
Directional Split	49%	51%	
Trip Ends	0	1	1

WEEKDAY

Trip Rate: 2.21

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	9	9	18

SATURDAY

Trip Rate: 0

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	NA	NA	NA



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

Land Use: General Office Building
Land Use Code: 710
Land Use Subcategory: All Sites
Setting/Location: General Urban/Suburban
Variable: 1000 SF GFA
Trip Type: Vehicle
Formula Type: Rate
Variable Quantity: **0.8**

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

AM PEAK HOUR

Trip Rate: 1.52

	Enter	Exit	Total
Directional Split	88%	12%	
Trip Ends	1	0	1

PM PEAK HOUR

Trip Rate: 1.44

	Enter	Exit	Total
Directional Split	17%	83%	
Trip Ends	0	1	1

WEEKDAY

Trip Rate: 10.84

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	4	4	8

SATURDAY

Trip Rate: 2.21

	Enter	Exit	Total
Directional Split	50%	50%	
Trip Ends	1	1	2



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

Land Use: Congregate Care Facility
Land Use Code: 253
Land Use Subcategory: All Sites
Setting/Location: General Urban/Suburban
Variable: Dwelling Units
Trip Type: Vehicle
Variable Quantity: **16**

AM PEAK HOUR

Trip Rate: 0.08

	Enter	Exit	Total
Directional Split	58%	42%	
Trip Ends	1	0	1

PM PEAK HOUR

Trip Rate: 0.18

	Enter	Exit	Total
Directional Split	49%	51%	
Trip Ends	1	2	3

WEEKDAY

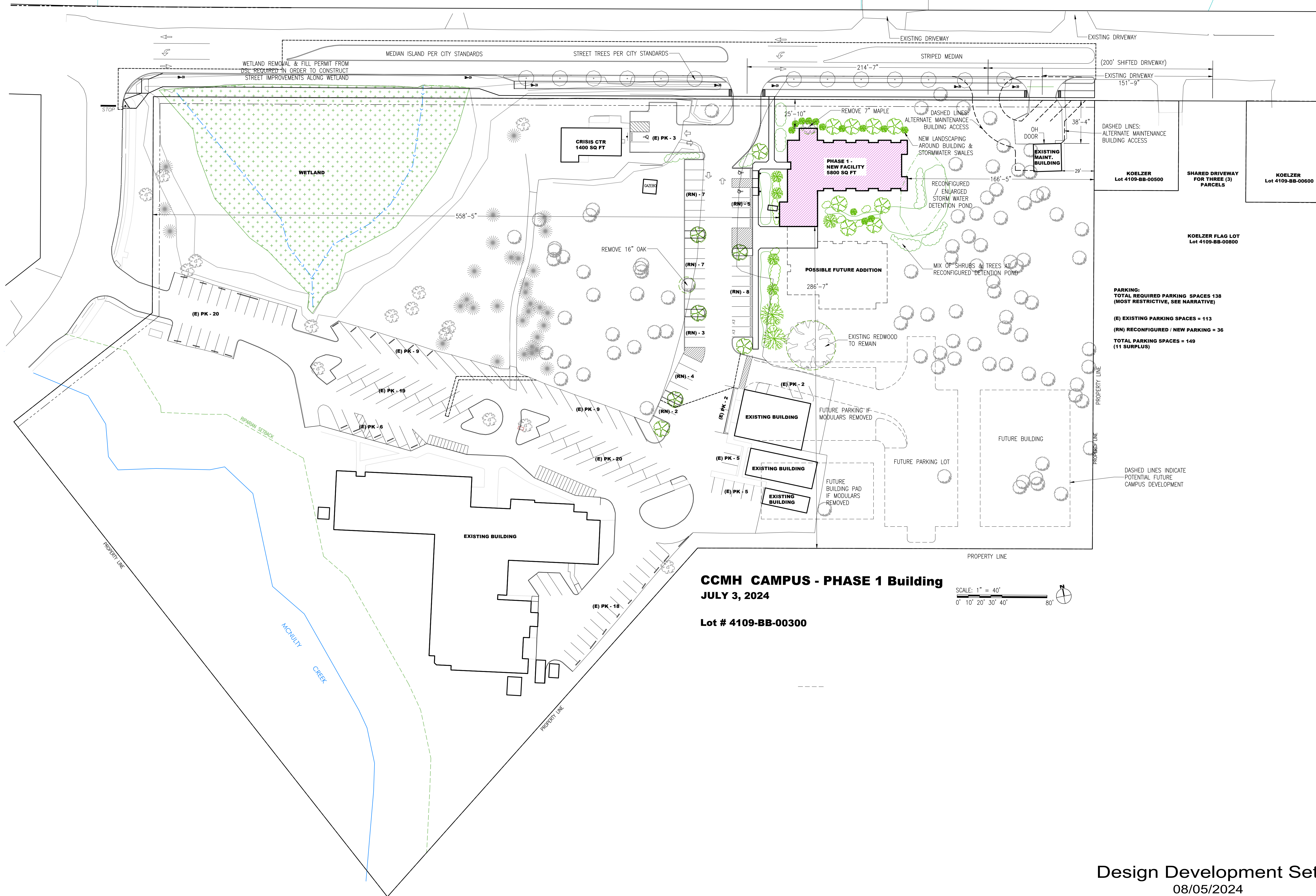
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Directional Split	50%	50%	
Trip Ends	18	18	36

SATURDAY

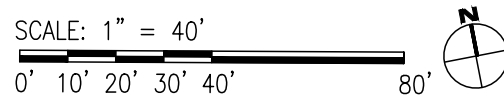
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Directional Split	50%	50%	
Trip Ends	NA	NA	NA



CCMH CAMPUS - PHASE 1 Building
JULY 3, 2024

Lot # 4109-BB-00300



PARKING:
TOTAL REQUIRED PARKING SPACES 138
(MOST RESTRICTIVE, SEE NARRATIVE)
(E) EXISTING PARKING SPACES = 113
(RN) RECONFIGURED / NEW PARKING = 36
TOTAL PARKING SPACES = 149
(11 SURPLUS)

DASHED LINES INDICATE
 POTENTIAL FUTURE
 CAMPUS DEVELOPMENT

PROJECT TEAM:

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STRUCTURAL ENGINEER:
 PETERSON STRUCTURAL ENGINEERS
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MEP ENGINEER:
 NIKE & Associates, Inc.
 6915 SW Macadam Ave, Suite 200
 Portland, OR 97219
 P: 503.892.1188

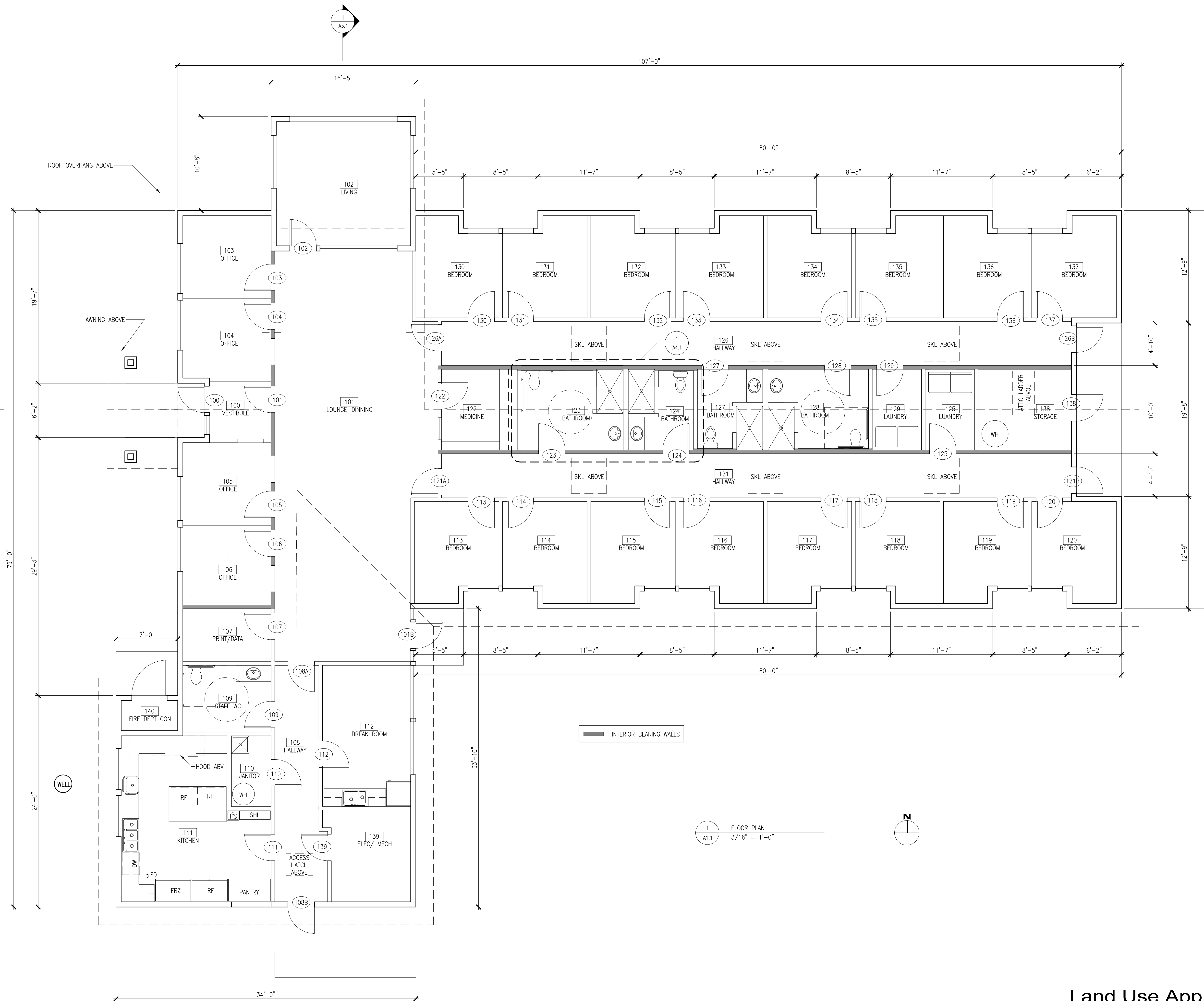
CCMH - NEW FACILITY
 Columbia Community Mental Health
 58646 McNULTY WAY,
 ST HELENS, OREGON 97051

SCALE: AS NOTED
 DRAWN BY: -
 CHECKED BY: -
 CAD FILE: -
 DATE: -

REVISIONS	
△	DESCRIPTION

CONTENTS:
 PHASE 1
 SITE PLAN

SHEET NO:



PROJECT TEAM:
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MEP ENGINEER:
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Portland, OR 97219
P: 503.892.1188

CCMH - NEW FACILITY
Columbia Community Mental Health
58646 McNULTY WAY,
ST HELENS, OREGON 97051

SCALE: AS NOTED
DRAWN BY: KP
CHECKED BY:
CAD FILE: 1704_PLAN
DATE:

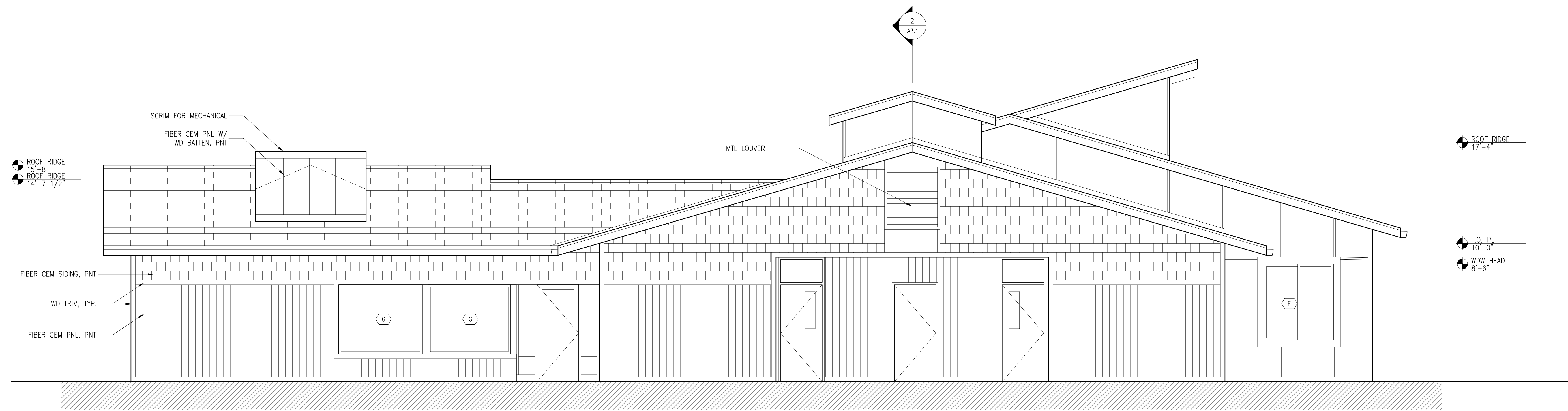
REVISIONS	
△	DESCRIPTION

CONTENTS:
FLOOR PLAN

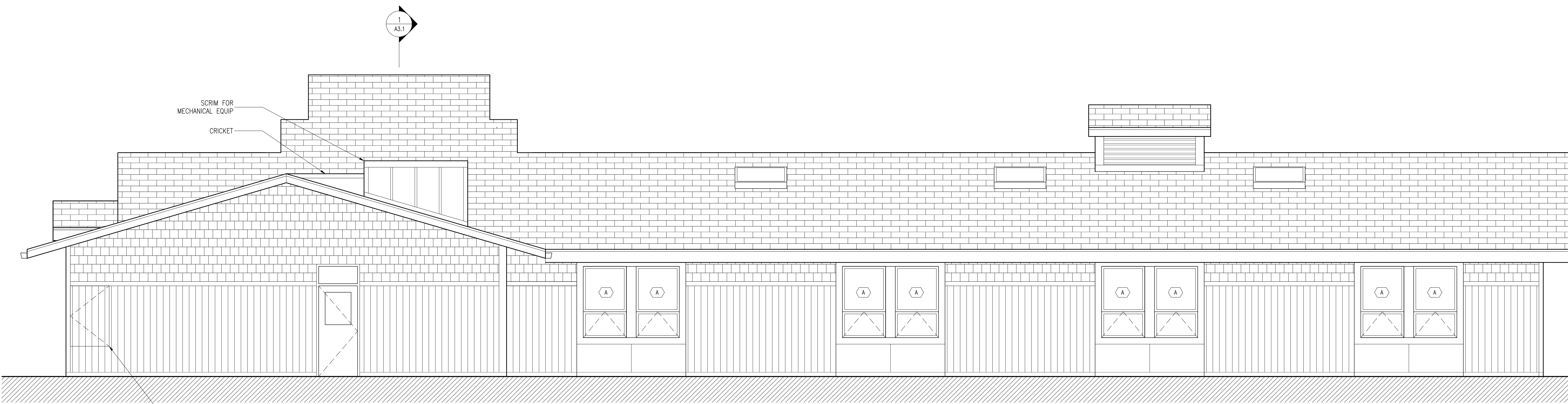
SHEET NO:

A1.1

Land Use Application
08/05/2024



1 ELEVATION - EAST
A2.2 1/4" = 1'-0"



2 ELEVATION - SOUTH
A2.2 1/4" = 1'-0"

PROJECT TEAM:

CIVIL ENGINEER:
HUMBER DESIGN GROUP, Inc.
110 SE Main Street, Suite 200,
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STRUCTURAL ENGINEER:
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MEP ENGINEER:
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Portland, OR 97219
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CCMH - NEW FACILITY

Columbia Community Mental Health
58646 McNULTY WAY,
ST HELENS, OREGON 97051

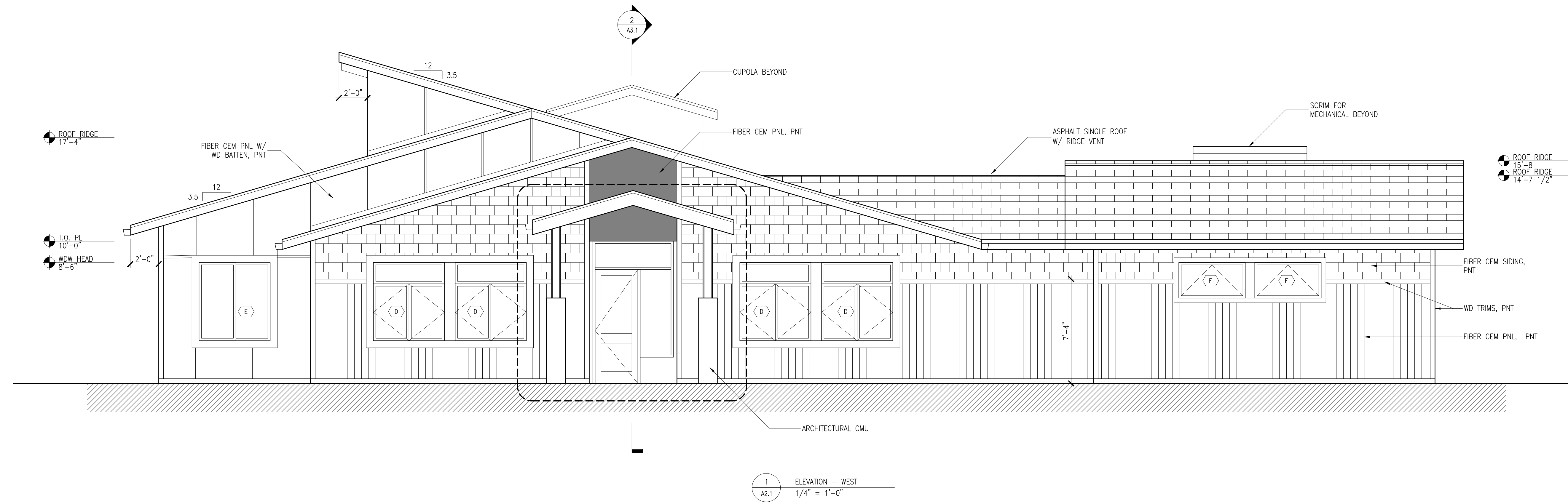
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CHECKED BY: -
CAD FILE: 1704_ELEV
DATE: 4/29/2024

REVISIONS	
△	DESCRIPTION

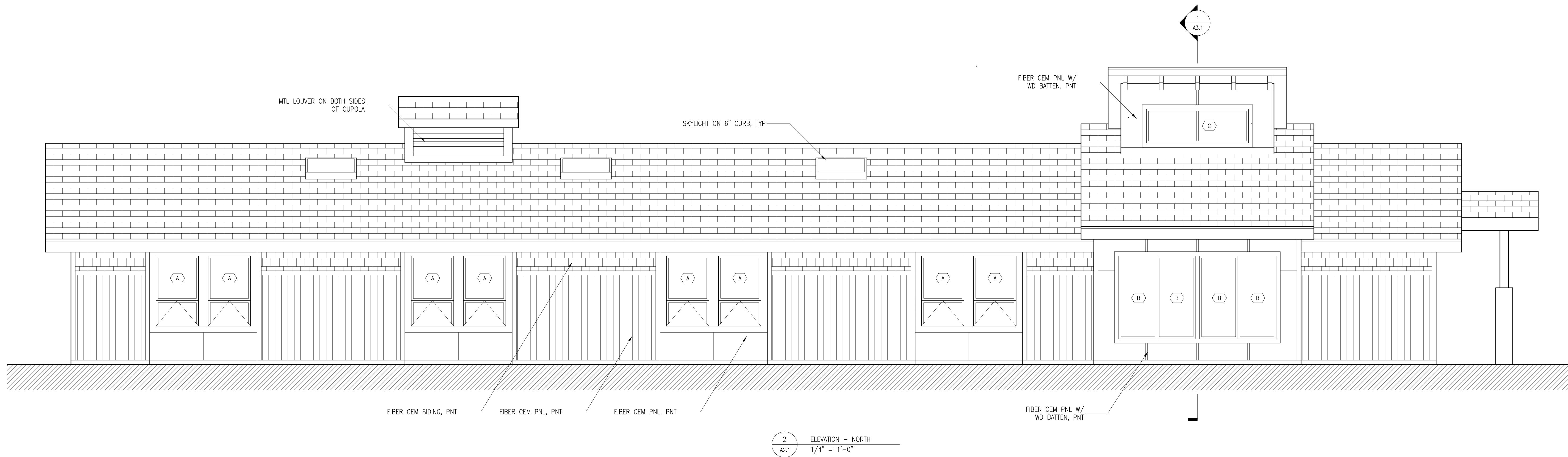
CONTENTS:
EXTERIOR ELEVATIONS
SHEET NO:

Land Use Application
08/05/2024

A2.2



1 ELEVATION - WEST
A2.1 1/4" = 1'-0"



2 ELEVATION - NORTH
A2.1 1/4" = 1'-0"

PROJECT TEAM:

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CCMH - NEW FACILITY

Columbia Community Mental Health
58646 McNULTY WAY,
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SCALE: AS NOTED
DRAWN BY: KP
CHECKED BY: -
CAD FILE: 1704_ELEV
DATE: 4/29/2024

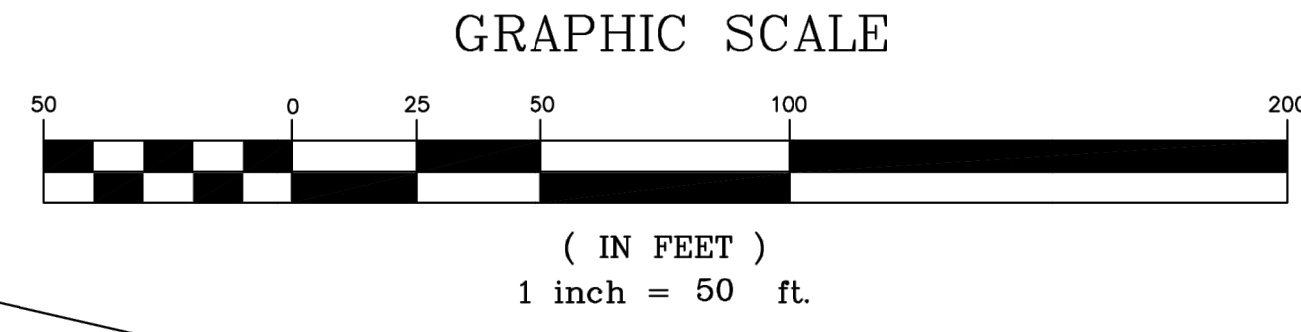
REVISIONS	
△	DESCRIPTION

CONTENTS:
EXTERIOR ELEVATIONS

SHEET NO:

Land Use Application
08/05/2024

A2.1



NOTES:

1. HORIZONTAL DATUM = OREGON COORDINATE REFERENCE SYSTEM, COLUMBIA RIVER WEST ZONE
2. VERTICAL DATUM - NAVD88
3. BENCHMARK - N.G.S. A 204, PID# RD3953

LEGEND:

- = MAIL BOX
- ⊗ = WATER METER
- ⊕ = WATER VALVE
- ⊗ = FIRE HYDRANT
- ⊕ = IRRIGATION VALVE
- = SIGN
- = SEPTIC TANK
- ⊗ = SANITARY SEWER CLEAN OUT
- ⊕ = SANITARY SEWER MANHOLE
- ☆ = LIGHT POLE
- ⊕ = UTILITY POLE
- = GUY ANCHOR
- ⊕ = COMMUNICATIONS RISER
- = BEEHIVE
- = CATCH BASIN
- ⊕ = STORM DRAINAGE MANHOLE
- ⊗ = TEST PIT
- = FENCE POST
- ⊗ = TREES
- = BURRIED COMMUNICATION LINE
- = FENCE LINE
- = GAS LINE
- = OVERHEAD POWER LINE
- = BURRIED POWER LINE
- = STORM LINE
- = WATER LINE
- = WETLAND BOUNDARY

STORM DRAINAGE TABLE:

1	I.E. 36" P.V.C. = 53.76'
2	I.E. 36" P.V.C. = 54.06'
3	I.E. 36" P.V.C. = 56.20'
4	I.E. 36" P.V.C. = 55.69'
5	I.E. 18" CONCRETE = 56.61'
6	I.E. 18" CONCRETE = 56.98'
7	I.E. 36" METAL = 56.50'
8	I.E. 36" METAL = 56.11'
9	I.E. 36" METAL = 56.08'
10	I.E. 36" METAL = 56.03'
11	I.E. 18" P.V.C. = 61.18'
12	I.E. 18" P.V.C. = 61.85'
13	I.E. 12" P.V.C. = 61.82'
14	I.E. 12" P.V.C. = 61.76'
15	I.E. 12" P.V.C. = 61.74'
16	I.E. 12" P.V.C. = 61.89'
17	I.E. 12" P.V.C. = 61.88'
18	I.E. 12" P.V.C. = 61.94'
19	CATCH BASIN RIM = 62.14'
20	CATCH BASIN RIM = 63.61'
21	STORM DRAINAGE MANHOLE RIM = 64.74'
22	BEEHIVE RIM = 62.60'
23	BEEHIVE RIM = 63.44'
24	STORM DRAINAGE MANHOLE RIM = 64.97'
25	CATCH BASIN RIM = 64.49'
26	STORM DRAINAGE MANHOLE RIM = 62.42'

SANITARY SEWER TABLE:

- 1 SANITARY SEWER PUMP STATION
RIM = 64.25'
- 2 SANITARY SEWER MANHOLE
RIM = 69.04'
I.E. 12" P.V.C. (N) = 63.04'
I.E. 8" P.V.C. (W) = 62.74'

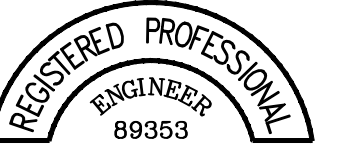
REGISTERED PROFESSIONAL LAND SURVEYOR
Donald D Wallace
 Digitally signed by Donald D Wallace
 Date: 2024.05.10 14:31:04 -0700
 OREGON
 JANUARY 19, 1993
 DONALD D WALLACE JR
 2601
 RENEWS 6/30/24

K.L.S. SURVEYING INC.
 1224 ALDER STREET
 VERNONIA, OREGON 97064
 (503) 429-6115

TOPOGRAPHIC SURVEY FOR
COLUMBIA COMMUNITY MENTAL HEALTH
 IN THE NW 1/4 OF SECTION 9,
 T4N, R1W, W.M.
 CITY OF ST HELENS,
 COLUMBIA COUNTY, OREGON
 SCALE 1" = 50' JANUARY 24, 2024

DRAWN BY: SWM FIELD: SWM/R/CAM EQUIPMENT: FOCUS36 JOB No. 23-136 PROJECT No. 23-136 REVISED: 5/10/2024

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 architecture + design llc



PROJECT TEAM:

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- MEP ENGINEER:**
 NIKE & Associates, Inc.
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 P: 503.892.1188



CCMH - NEW FACILITY
 Columbia Community Mental Health
 58846 McNULTY WAY,
 ST HELENS, OREGON 97051

SCALE:
 DRAWN BY:
 CHECKED BY:
 CAD FILE:
 DATE: 07/16/2024

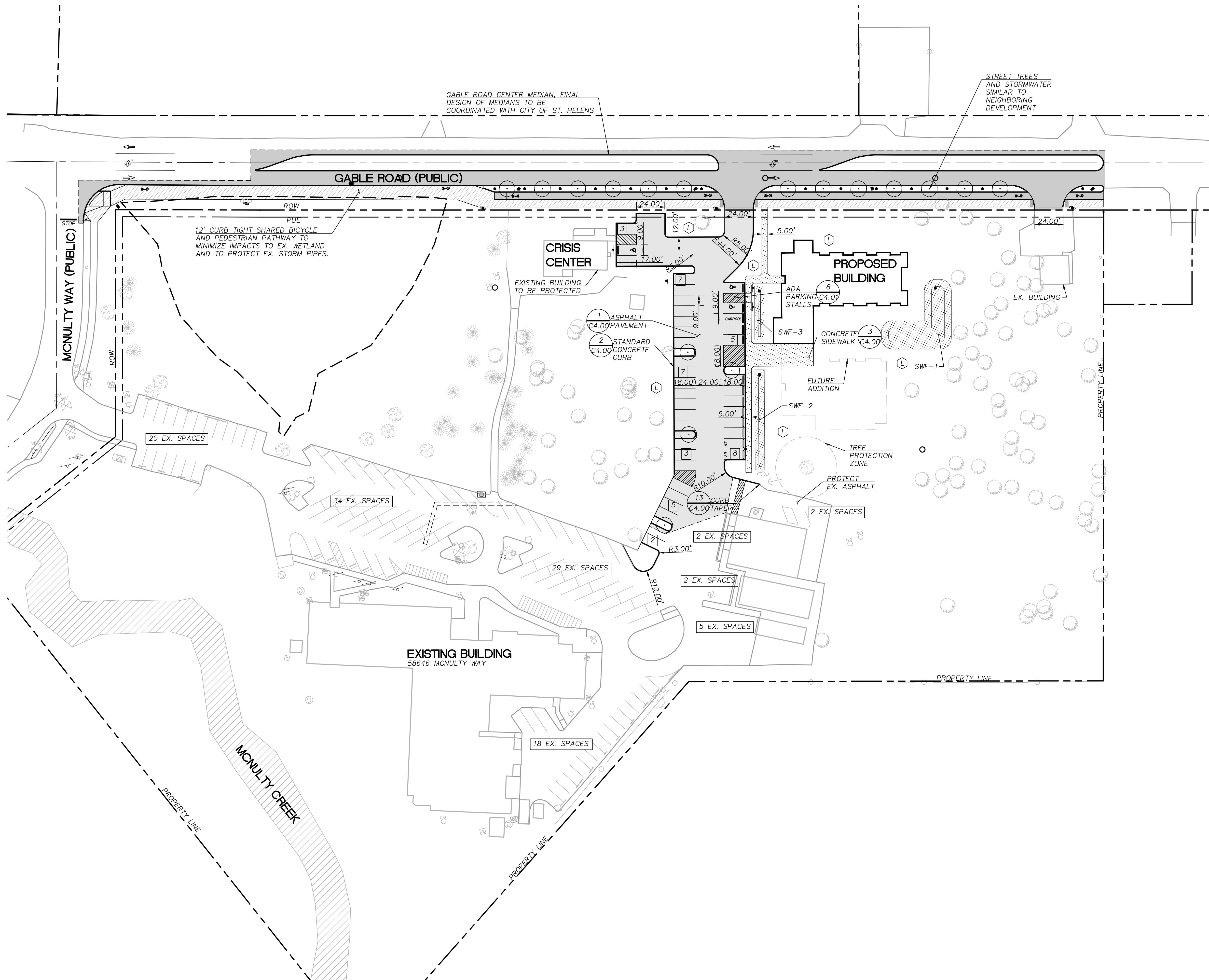
REVISIONS	DATE	DESCRIPTION

CONTENTS:
 EXISTING CONDITION PLAN

SHEET NO:

C0.50

101 ST HELENS ST
 ST HELENS, OR 97051
 T: 503.366.3050 F: 503.366.3055



GABLE ROAD CENTER MEDIAN, FINAL DESIGN OF MEDIANS TO BE COORDINATED WITH CITY OF ST. HELENS

STREET TREES AND STORMWATER SIMILAR TO NEIGHBORING DEVELOPMENT

12' CURB TIGHT SHARED BICYCLE AND PEDESTRIAN PATHWAY TO MINIMIZE IMPACTS TO EX. WETLAND AND TO PROTECT EX. STORM PIPES.

CRISIS CENTER

PROPOSED BUILDING

EXISTING BUILDING
58646 McNULTY WAY

LAYOUT AND PAVING PLAN
SCALE: 1"=40'

SHEET LEGEND		
	PRIVATE ASPHALT PAVEMENT	SEE DTL 1 SHT C4.00
	PRIVATE CONCRETE SIDEWALK	SEE DTL 3 SHT C4.00
	PRIVATE CONCRETE PAVEMENT	SEE DTL 2 SHT C4.00
	PUBLIC ASPHALT PAVEMENT	
	PUBLIC CONCRETE SIDEWALK	
	PUBLIC CONCRETE PAVEMENT	
	STORMWATER POND	SEE DTL 1 SHT C4.01
	LANDSCAPING	SEE LANDSCAPE PLANS
	STANDARD CURB	SEE DTL 2 SHT C4.00
	WHEEL STOP	SEE DTL 5 SHT C4.00

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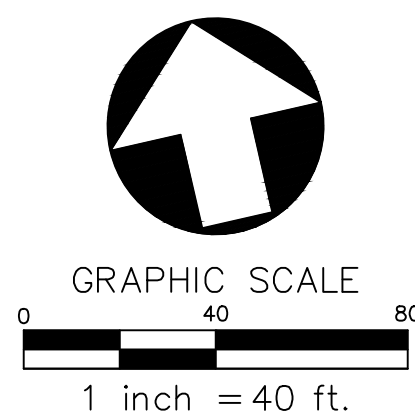
CCMH - NEW FACILITY
 Columbia Community Mental Health
 58646 McNULTY WAY,
 ST HELENS, OREGON 97051

SCALE:
 DRAWN BY:
 CHECKED BY:
 CAD FILE:
 DATE: 07/16/2024

REVISIONS	DATE	DESCRIPTION

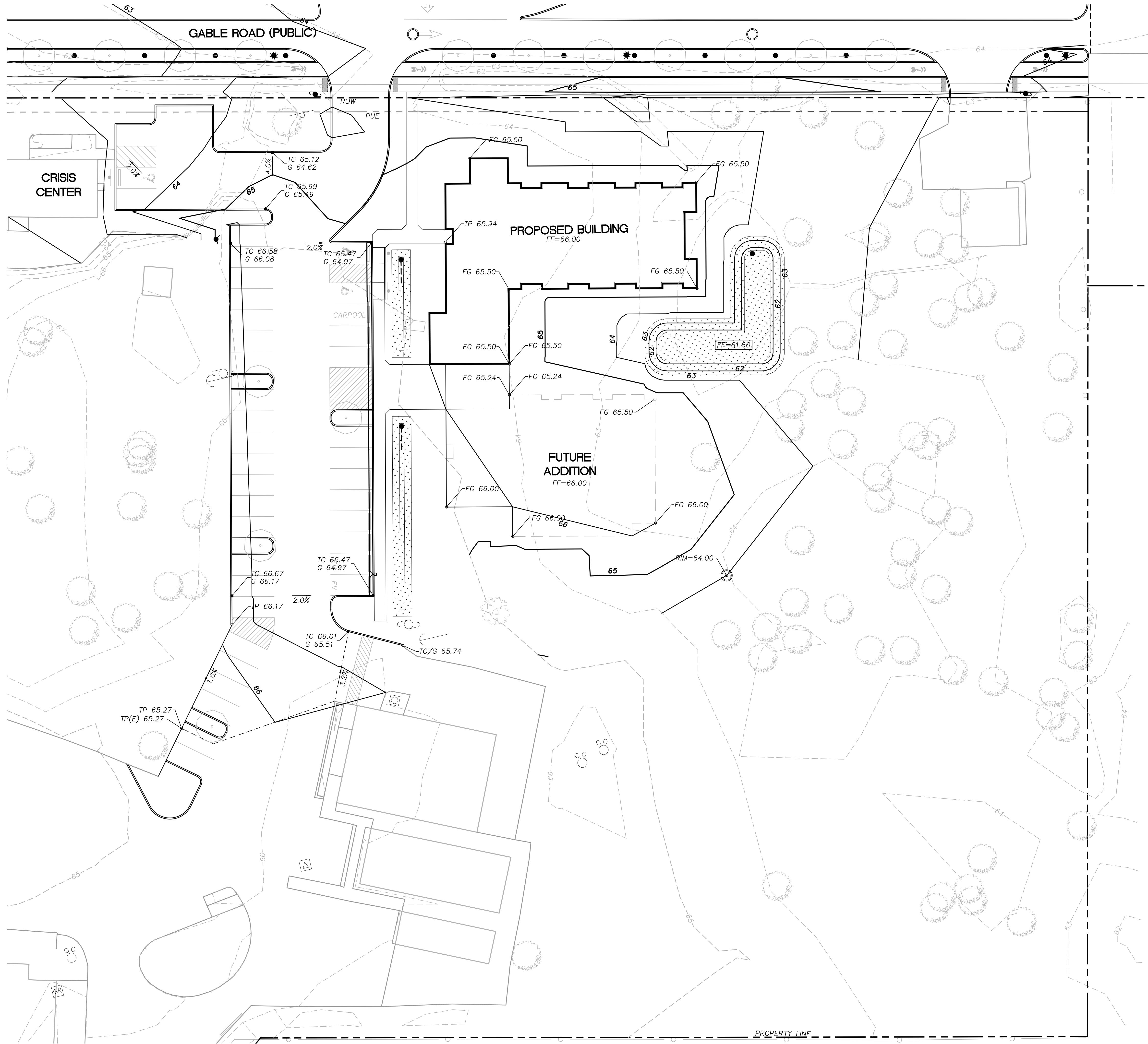
CONTENTS:
 LAYOUT AND PAVING PLAN

SHEET NO:



C1.00

101 ST HELENS ST
 ST HELENS, OR 97051
 T: 503.366.3050 F: 503.366.3055



GRADING PLAN
SCALE: 1"=20'

SHEET LEGEND	
---259---	EXISTING CONTOUR
---260---	PROPOSED CONTOUR
G XXX.XX	GRADE AT GUTTER
TC XXX.XX	GRADE AT TOP OF CURB
TP XXX.XX	GRADE AT TOP OF PAVEMENT
TF XXX.XX	GRADE AT TOP OF FOOTING
FF XX.XX	FINISH FLOOR ELEVATION
FG XXX.XX	FINISHED GRADE
TW XXX.XX	GRADE AT TOP OF WALL
EG XXX.XX	EXISTING GRADE
(E)	EXISTING
-X.X%	SLOPE ARROW
GB	GRADE BREAK

AKAAN
architecture + design llc

REGISTERED PROFESSIONAL ENGINEER
89223
OREGON
SEPT. 2, 2019
ALLEN SCHMITZ
RENEWAL DATE 6/30/26

PROJECT TEAM:

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H Humber Design Group, Inc.
Civil Engineering • 503.946.6690 • hdbgdx.com

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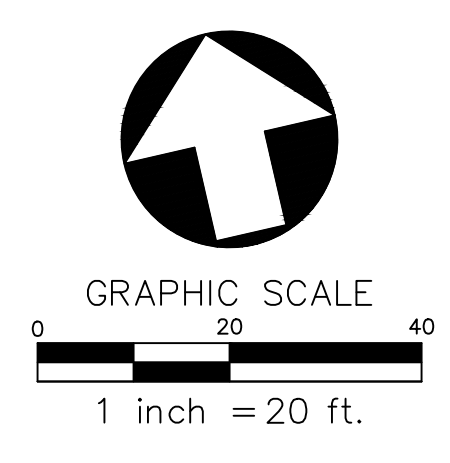
SCALE:
DRAWN BY:
CHECKED BY:
CAD FILE:
DATE: 07/16/2024

REVISIONS	
Δ	DESCRIPTION

CONTENTS:
GRADING PLAN

SHEET NO:

C2.00



101 ST HELENS ST
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