



# CITY OF ST. HELENS PLANNING DEPARTMENT

# MEMORANDUM

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

Attempt by applicant to expand scope of original proposal “mid-application.”

**DATE:** October 1, 2024

Applicant provided revised materials on September 30, 2024 hoping to expand the scope of application. This includes approximately 5,200 additional square feet to the originally proposed building adding 18 beds and four offices.

**The staff report dated September 30, 2024 does not reference the September 30, 2024 materials from the applicant due to timing. So be mindful of which materials you are looking at. The original application materials were received August 22, 2024.**

None of the now proposed expansion was considered in the original application materials provided on August 22, 2024. Based on the provisions of Site Development Review and Conditional Use Permit, any major or minor modification of an application requires a new application.

Focusing on the major modification standards for Conditional Uses:

- A major modification explicitly requires a new application per SHMC 17.100.050(3).
- Per SHMC 17.100.050(2)(a), a change in land use is a major modification. The applicant notes this is a “residential facility” which differs from the original application’s use. 18 beds also exceed the number limit of 16 for a residential facility. This appears to be a change in land use and thus a Major Modification.
- Per SHMC 17.100.050(2)(b), an increase in dwelling unit density is a major modification. The original application indicated as many as 16 sleeping rooms. This increases it by 18, an increase of approximately 113%. This increased intensity of land use is a Major Modification.
- Per SHMC 17.100.050(2)(c), a 10% change in the ratio of the different types of dwelling units to the number of units is a major modification. The original up to 16 units are characterized differently than the detoxification and crisis stabilization ones described in the revision. This increases it by 18, an increase of over 100%. This increased intensity of land use is a Major Modification.
- Per SHMC 17.100.050(2)(f), an increase in floor area for non-residential use by more than 10% where previously specified is a major modification. With the building addition, it will be classified as an “I” occupancy for institutional (not “R” for residential) and the new square footage is 5,200 compared to the original 5,800 square feet. This is an increase of 89.7 percent in area and a Major Modification.
- Per SHMC 17.100.050(2)(j), a 10% increase in the approved density is a major modification. The original application indicated as many as 16 sleeping rooms. This increases it by 18, an increase of approximately 113%. This increased intensity of land use is a Major Modification.

The reasons why this September 30, 2024 “mid-application” expansion proposal is a modification requiring a new application is not necessarily limited to the above. And it just takes one modified application criteria to require a new application. This memo presents several.

Expanding the size of the building and intensity of land use mid-application does not appear legally feasible. **The Commission must reject this proposal and omit it from its decision** for the Conditional Use Permit **CUP.1.24**, Unlisted Use **U.1.24**, and Access Variance **VAR.7.24** application.

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

**Addendum 1  
Phase 2 Addition  
Detoxification Facility and a Crisis Stabilization Center**

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

**Addendum for Phased Development:**

**Submittals:**

- **Architectural Drawings (AKAAN)**
  - **SP-1 Architectural Site Plan Indicating Phase 2**
  - **A1.1 Architectural Floor Plan with Phase 2**
  - **A 2.1 & A 2.2 Architectural Elevations with Phase 2**

**RECEIVED**  
**SEP 30 2024**  
**CITY OF ST. HELENS**

**Summary:**

CCMH has been tentatively approved and is currently in final negotiations for funding for a phase 2 expansion of the Phase 1 building. The funding will allow for the construction of an addition to the currently designed Transitional Housing Facility for a Detoxification Facility and a Crisis Stabilization Center.

This addendum requests that the planning commission approve Phase 2, either (1) as an outright approval as part of this application, or (2) as a phased development as allowed under SHMC 17.96.050 Phased development.

The intent of this request is simply to save everybody the time and effort of going through this same land use process again in a few months for what is essentially a simple expansion of the same request.

The only differences are: (1) the building is bigger, and (2) the parking requirements are more for the larger building.

Here is the conundrum and why we are making this request at this time.

SHMC Section 17.96.070 basically says that when additional parking needed it is considered a "Major Modification" and site design review must happen again.

However as can be seen in the below analysis, CCMH has surplus parking and even with the larger building there is enough surplus parking to account for this expansion.

We see no reason to go through site design review again when all the requirements are already met. We propose saving everyone's time and effort when the outcome can be foretold.

## Phase 2 Description

Phase two will be an addition to the building that will consist of two parts:

A Detoxification Facility for up to **10** individuals

A Crisis Stabilization Center for up to **8** patients.

The Detoxification Facility and the Crisis Stabilization Center will be designed per ORS / OAR rules and will be fully licensed as required by Oregon Law.

The building addition will include four (4) additional staff offices.

**Narrative revisions for Phase 2.**

(the below revisions are the only revision to our already submitted application and narrative)

**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.

Detoxification Facility and Crisis Stabilization Center will be fully licensed as outlined per Oregon ORS / OAR’s.

(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 (walkways etc.)	5,228 sq. ft.

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

Existing Lot Coverage      27540 / 431279 = 6.3 %

New Facility & related improvements

New Building Phase 1	5800 sq. ft.
New Paved Areas	16,245 sq. ft.
New Concrete	2,297 sq. ft.
<b>Phase 2 Addition</b>	<b>5280 sq ft</b>

**Lot Coverage with New improvements = 57,162**

**New Lot Coverage    57,162 / 431279 = 13.25 %**

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.

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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.

## Phase 2 Addition

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

Detoxification Facility - 10 beds,

Crisis Stabilization Center - 8 beds

18 beds / 3 = six (6) parking spaces

Four staff offices = four (4) parking spaces

Ten (10) additional parking spaces required.

**11 surplus parking spaces are already included in the site plan.**

**Parking Requirement is met.**

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 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 trip generation memo.

**The acquisition of funding for this Phase 2 has come very recently and we have not had sufficient time before this Land Use hearing to have the traffic engineer provide an updated memo.**

**However, simple correlation is justified.**

**Phase 1 building is 5800 sq. ft. and per Lancaster Mobley’s memo the estimated trips are no more than 4 peak hour trips or 44 daily trips per day.**

**The Phase 2 portion is an additional 5200 sq. ft. (slightly smaller than Phase 1). If we simply apply the same numbers as Phase 1 to the smaller Phase 2 addition the total would be no more than 8 peak hour trips or 88 daily trips. The total traffic impact is still less than the maximum 700 daily trips established by City Council in ORD No. 3297**



## 17.96.050 Phased Development:

(1) The director may approve a time schedule for developing a site in phases over a period of time of one year, but in no case shall the total time period for all phases be greater than three years without reapplying for site development review.

(2) The criteria for approving a phased site development review proposal is that all of the following are satisfied:

(a) The public facilities are constructed in conjunction with or prior to each phase;

(b) The development and occupancy of any phase is not dependent on the use of temporary public facilities:

(i) A "temporary public facility" is any facility not constructed to the applicable city or district standard;

(c) The phased development shall not result in requiring the city or other property owners to construct public facilities that were required by approved development proposal; and

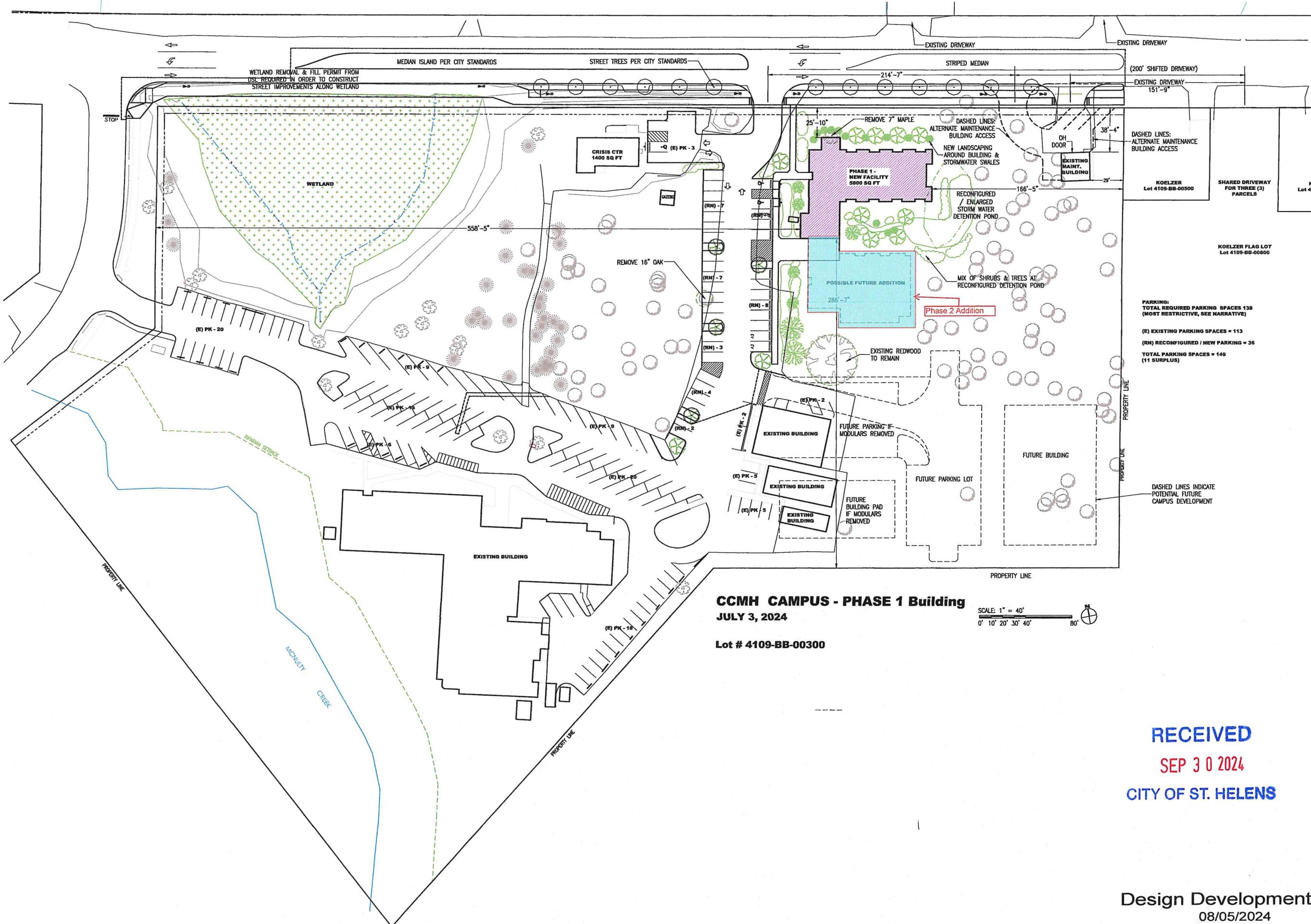
(d) The director's decision may be appealed as provided by SHMC 17.24.310(1). No notice need be given of the director's decision. (Ord. 2875 § 1.128.050, 2003)

**(a) CCMH intends to construct all the necessary utilities as part of Phase1. The final design of the street (sidewalks, landscape strip, bike lane, and medians will be worked through as part of the final design with city staff.**

**(b) CCMH does not intend to construct temporary public facilities as part of the construction of this building.**

**(c) This proposal does not require neither other property owners nor the city to construct public facilities.**

**(d) Not applicable at this time.**

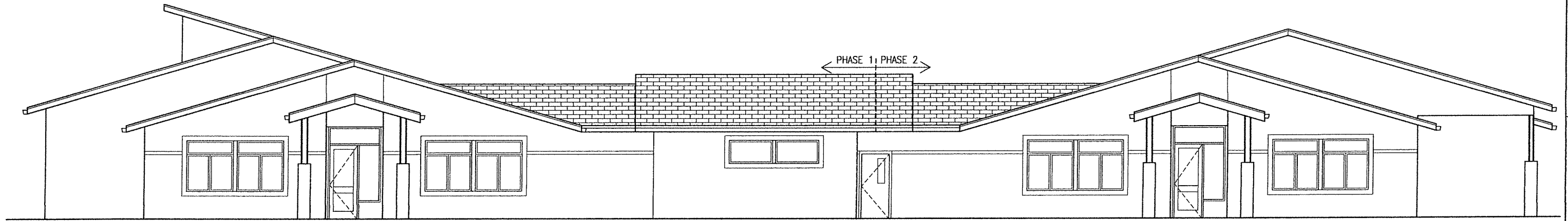


**CCMH CAMPUS - PHASE 1 Building**  
**JULY 3, 2024**  
**Lot # 4109-BB-00300**

SCALE: 1" = 40'  
0' 10' 20' 30' 40' 80'

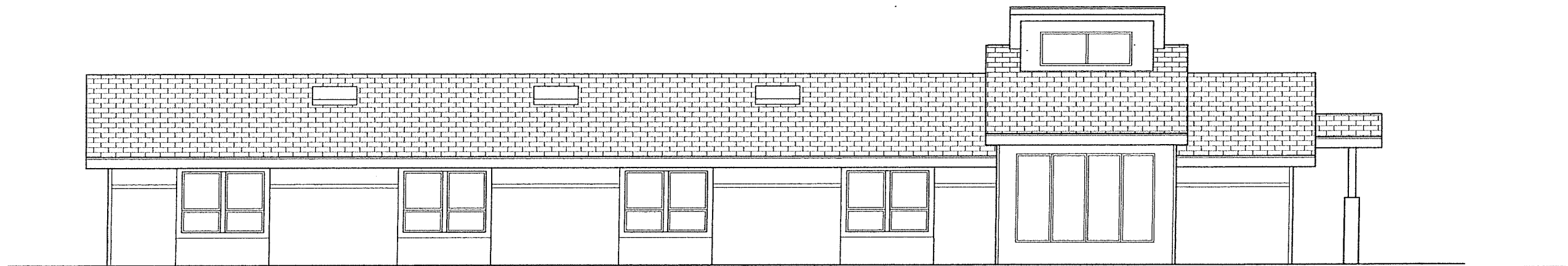
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**Design Development Set**  
08/05/2024  
NOT FOR CONSTRUCTION



← PHASE 1 | PHASE 2 →

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



2 ELEVATION - NORTH ( GABLE ROAD )  
1/4" = 1'-0"

PROJECT TEAM

CIVIL ENGINEER:  
HUMBER DESIGN C  
110 SE Main Street  
Portland, OR 97214  
P: 503.488.5711

STRUCTURAL ENG  
PETERSON STRUC  
9400 SW Barnes Rd  
Portland, OR 97225  
P: 503.292.1635

MEP ENGINEER:  
MKE & Associates, Inc  
6915 SW Macadam /  
Portland, OR 97219  
P: 503.892.1188

**CCMH - NEW FACILITY**  
Columbia Community Mental Health

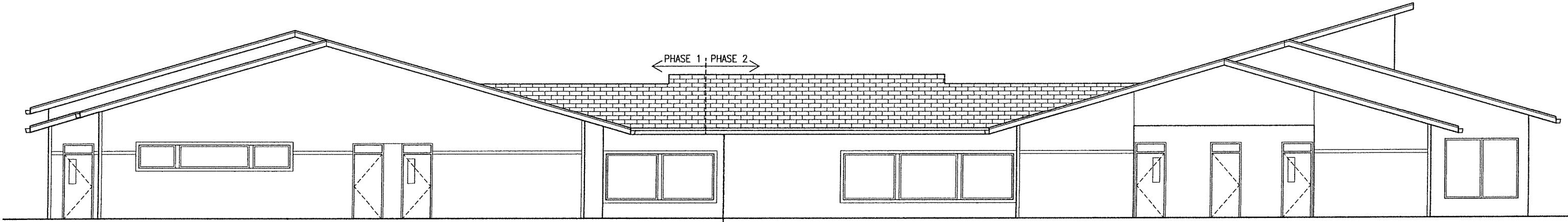
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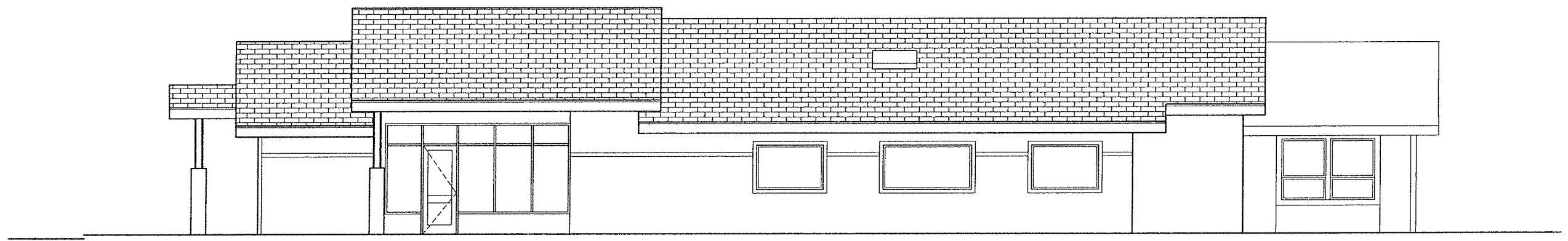
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EXT  
ELEV/

SHEET NO.



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



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

PROJECT TEAM

CIVIL ENGINEER:  
HUMBER DESIGN C  
110 SE Main Street,  
Portland, OR 97214  
P: 503.468.5711

STRUCTURAL ENG  
PETERSON STROCK  
9400 SW Barnes Rd  
Portland, OR 97225  
P: 503.292.1635

MEP ENGINEER:  
MKE & Associates, ll  
6915 SW Macadam,  
Portland, OR 97219  
P: 503.892.1180

**CCMH - NEW FACILITY**  
Columbia Community Mental Health

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