

CITY OF ST. HELENS PLANNING DEPARTMENT
STAFF REPORT
Site Development Review SDR.9.21
Sign Permit S.9.21

DATE: June 30, 2021
TO: Planning Commission
FROM: Jacob A. Graichen, AICP, City Planner

APPLICANT: Angelo Planning Group for St. Helens School District
OWNER: COL CO AD SCHOOL DIST 502-ST HELENS

ZONING: Public Lands, PL

LOCATION: St. Helens High School at 2375 Gable Road

PROPOSAL: Addition and renovation of the existing high school. Includes modification to some parking areas and expansion and addition of outdoor sports facilities in existing open space/athletic fields

SITE INFORMATION / BACKGROUND

The site was annexed to St. Helens around 1971. The high school was already present at that time; the applicant notes some buildings on the site dating to the 1950s. In 1980 the city approved an expansion of the high school which required a Conditional Use Permit due to the R10 residential zoning of the property at the time. **The 1980 approved expansion increased student capacity from 600 to 1200.** Permits since the 1980 expansion are smaller in scale and includes:

- 1995 Site Development Review for concession/restroom facility associated with the athletic field.
- 2000 Site Development Review (SDR.15.00) for ??? (file misplaced)
- 2007 sign permit (S.36.07) to replace freestanding sign along Gable Road
- 2008 minor Site Development Review (SDRm.2.08) for a weight training building
- 2010 minor Site Development Review (SDRm.6.10) for a portable classroom

The current proposal is the most significant since the 1980 effort.

Site Development Review applications are normally administrative decisions. Pursuant to SHMC 17.24.090(2), the Planning Director may refer any application for review to the Planning Commission. Staff chose to refer this to the Commission given (1) the scale of this public project, (2) the significance of the high school to the community, (3) to provide a better platform for public testimony, and (4) the less defined standards of the Public Lands zoning district.

PUBLIC HEARING & NOTICE

Public hearing before the Planning Commission: July 13, 2021

Notice of this proposal was sent to surrounding property owners within 100 feet of the subject property(ies) on June 24, 2021 via first class mail. Notice was sent to agencies by mail or e-mail on the same date.

Notice was published on June 30, 2021 in The Chronicle newspaper.

APPLICATION COMPLETENESS

This application was originally received on May 14, 2021. 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 June 10, 2021. The applicant provided what was necessary and the application was deemed complete on June 14, 2021.

The 120-day rule (ORS 227.178) for final action for this land use decision is October 11, 2021.

AGENCY REFERRALS & COMMENTS

As of the date of this staff report, no agency referrals/comments have been received that are pertinent to the analysis of this proposal.

APPLICABLE CRITERIA, ANALYSIS & FINDINGS

Zoning Compliance: This starts on page 6 of the applicant's narrative.

The site is zoned Public Lands, PL. Public school is a permitted use. **The Commission needs to consider the standards of this zoning district as they involve more discretion than usual:**

- (a) The standards for the PL zone shall be determined by proximity to residential zones and the anticipated off-site impacts.
- (b) The maximum building height shall be determined on a case-by-case basis (see SHMC 17.68.040).

The north and south side of the subject property are bounded by developed public streets. The east side abuts Highway Commercial, HC zoned and developed property and proposed changes are insignificant on this side. The west "side" (irregular in geometry) abuts Apartment Residential, AR zoned land. Of this land, most along the northwest corner of the site is developed with residential uses, except property at 2625 Gable Road, a church. The residential zoned land along the southwest side is underdeveloped.

To address (a), the applicant proposes a 10' wide yard (setback) (that coincides with the rear yard requirement of the AR zone) where there are buildings on campus. Along the athletic fields, at least 10-foot separation is also proposed with some trees. However, some pole mounted lighting is also proposed in this area. The applicant notes no or minimal glare to neighboring properties for new lights. On the photometric plan, sheet E1.02 there is no photometric data for athletic field lighting. However, the photometric information for the athletic fields are included on a separate document (from Munsco Lighting) showing that glare will be minimal.

Final photometric plans will be required as part of building permits to account for any changes from these preliminary plans.

The Commission needs to determine that the methods proposed by the applicant are sufficient. Public testimony may be a consideration in this regard.

Note that in the 1980 decision a buffer and screening finding noted that *“There will be fencing around the entire playing field area with a buffer zone in the northwestern area to provide extra buffering between playing fields and the residential area. All fencing will have 1’ setback from the property boundary.”* There is currently fencing along the playing fields on the west side of the site. Today there is a buffer in the northwestern area given the distance actual ball fields are from this area. The current proposal will result in specific sporting type improvements in this area.

Does the Commission think any new buffering is needed with this change since the non-sport programmed part of the field area of the last 40 years will be developed specifically as playing fields?

In regards to (b) the applicant notes that building height of any renovated building will not exceed 33 feet. Highest existing building on campus is 61 feet. 33 feet is below the maximum 35’ building height of the AR zone. Note that building maximum building height in the Highway Commercial, HZ zone is 40 feet.

This property consists of multiple properties that need to be combined for development purposes because of overlapping improvements. This can be done with a covenant to bind property recorded on the deed records of the County Clerk.

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Addition Yard Setback Reqs & Exceptions: This starts on page 10 of the applicant’s narrative.

The closest distance any building is from a property line is 11 feet along a side property line. Distances from streets are much greater. No conflict with Chapter 17.64 SHMC.

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Landscaping/buffering/screening: This starts on page 13 of the applicant’s narrative.

Street trees are required for projects of this magnitude. The segment of Gable Road between US30 and Columbia Boulevard was recently improved with sidewalk, curb/gutter, landscape strip and street trees. Along the high school property, a sidewalk has been in place for years but not a formal landscape strip defined by sidewalk on one side and curb (new with said project) on the other. Except for the westernmost portion of the subject property, street trees are behind the sidewalk and mature. These “old” street trees are proposed to be protected. Some additional trees are proposed behind the sidewalk to fill in some gaps.

The applicant is requesting an exception to keep the street trees behind the sidewalk, which is logical and acceptable under the circumstances. Reconstruction of the Gable Road street frontage is not warranted.

The applicant does not address street trees along Firlok Park Boulevard. There are groupings of trees along Firlok Park Boulevard, but large gaps too. Since the city is not requiring improvements Firlok Park Boulevard and site improvements are not proposed in the area adjacent to this street, additional street trees along Firlok Park Boulevard are not warranted.

This chapter requires buffering. Schools are not identified as a buffer requirement trigger per Figure 13 of this chapter, but large parking areas are. This is not an issue on the east side that abuts Highway Commercial property (and is not subject to much change). However, the west side the property abuts Apartment Residential, AR zoned property developed with detached single-family dwellings, generally. AR zoned properties are not subject to buffering protection in this case (R10, R7 and R5 are). However, a 10 swath of landscaping proposed would meet the intent of the buffer anyways if these properties were zoned R10, R7 or R5.

Note that on page 20, the applicant asks for an “in lieu” plan for buffering requirement. This is not necessary as the buffer requirement is not triggered.

Fencing. Applicant proposes some new fencing. No proposed fence is close to Gable Road or Firlok Park Boulevard or over 6’ in height. So, no setback, height or vision clearance issues as they pertain to fencing. Trash enclosure wall is proposed at 7 feet.

Fence (or wall) greater than 6’ is acceptable if the approval authority, as a condition of approval, allows such height to mitigate against potential adverse effects. High School age teens can be physical (able to clear 6’ walls) and enjoy mischief and hiding places (like trash enclosures). 7’ will help mitigate the temptations of teenager tendance towards mischief.

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

Because the parking lot 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.

Though there are some nice mature trees, none of the parking areas meet this “screening” requirement now. However, except for the parking areas on the east side, which are not proposed to be substantially modified, parking areas are proposed to have landscaping along the perimeter that includes a balance of low lying and vertical shrubbery and trees.

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.

Applicant notes new rooftop equipment that, where visible, will be screened by metal louver screening. Plans do not show this equipment in detail, however. Screening required in all cases.

In addition, the modular building currently on site (approved by SDRm.6.10 in 2010) included a similar screening requirement. At that time, the school district installed vinyl slatting, but that was removed after several years. Applicant notes adding this back. In addition, proposed landscaping will help too.



Above (left and right): Photos of the modular installed around 2010 and included in this proposed in a new location. As shown in the photos, modular units have mounted HVAC equipment which is not screened and positioned such that screening can be difficult.

Refuse container or collection area are required to be screened (e.g., trash enclosure). A new trash and generator enclosure is shown on the plans. It is screened by a proposed 7' tall CMU wall with sight obscuring doors.

Interior parking lot landscaping. When off-street parking lots have more than 20 spaces, landscape islands are required with trees. 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.

The parking lot areas of the high school currently do not meet this requirement. Parking areas subject to substantial change are proposed to meet this requirement, which is logical under the circumstances. The proposed new “tree islands” appear to meet the size and plating requirements.

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Visual Clearance: This starts on page 24 of the applicant’s narrative.

Chapter 17.76 SHMC requires proper sight distances at intersections to reduce traffic hazard potential.

This applies to accesses proposed to be modified by this proposal, all of which are from Gable Road. Plans demonstrate compliance at these driveway locations.

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Off-Street Parking/Loading: This starts on page 27 of the applicant’s narrative.

Off street parking is existing and proposed to be modified in places.

Dimension and type. All proposes spaces are standard size and meet the normal dimensional requirements (i.e., 9 x 18 feet).

Location. Parking spaces are required to be within 200 feet from the building/use proposed to be served. This is the case.

Accessible (disabled person) spaces. Required to comply with State and Federal Standards. Upon project completion, the applicant anticipates 541 off-street parking spaces.

Per the 2019 Oregon Specialty Code, this requires at least 11 accessible spaces, 2 of which are required to be wheelchair use only. Preliminary plans show about 15 such spaces with wheelchair aisles wide enough for wheelchair use only.

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. It appears the applicant has taken this into consideration.

Bicycle parking. The normal bicycle parking requirement is 2 per classroom. The applicant notes 55 classrooms, which would normally require 110 bicycle spaces. The school district does not want to install this quantity. There is currently a typical small bike rack near the front of the school (Gable Road side). Bike parking does not appear to have been required previously.

Per the applicant, the minim off-street parking requirement for the high school (if built today) would be 337 spaces. The minimum for the proposed renovation is 434. This is a difference of 97 off-street parking spaces or an increase of about 29 percent. Parking for proposals with existing development is based on the increase. Applying this to bicycle parking, 29% of 110 is 31.9 or 32 bicycle spaces. The applicant proposes 17 bicycle parking and 20 skateboard/scooter spaces—a total of 37, which is acceptable.

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. A freestanding metal

canopy is proposed to cover the bike/skateboard/scooter spaces and the location is otherwise appropriate. **However, there is no plan for the metal canopy.**

Why does sheet A1.01 show bike parking along the east side, which is not otherwise mentioned? Plans also are inconsistent as to bike parking.

Number of off-street parking spaces required. The calculation for high schools includes several factors. The applicant breaks this down showing that the minimum off-street parking for the proposal is 434 and 541 are proposed.

Aisle width. Aisle widths appear adequate.

Markings. All interior drives and access aisles are required to be marked and signed to indicate direction flow. This is generally depicted on the preliminary plans. However, some locations are missing such (e.g., the one-way only exit driveway onto Gable Road).

Surface area. All areas used for parking, storage or maneuvering of vehicles (including things towed by vehicles) shall be paved. No exception to this is proposed.

Wheel stops. Wheel stops are required along the boundaries of a parking lot, adjacent to interior landscape area, and along pedestrian ways. Applicant doesn't address this properly. Wheel stops will be required per Chapter 17.80 SHMC. For example, where the front of the stall has landscaping within three feet that could be damaged by vehicular overhang or abut a walkway less than 7 feet wide (3 feet overhand + 4 foot minimum walkway width per Chapter 17.84 SHMC). Based on the preliminary plans submitted this will apply to several parking spaces.

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). Proposed drainage plans are included with the applicant's preliminary utility plans.

Lighting. Required to be directed to avoid glare from surrounding residences and roads/streets. Applicant has taken this into consideration.

Loading/unloading driveways. Uses such as a school or other meeting place designed to accommodate > 25 people at one time are required to have a driveway designed for continuous forward flow of passenger vehicles for the purpose of loading and unloading passengers. This applies in this case.

There are both such areas for busses and parents. However, the non-bus drop off area is within the parking area for staff only (parking area "C" - see page 4 of applicants narrative).

What is the school districts method of preventing confusion of this?

Off-street loading spaces. New or altered buildings or structures which receive and distribute material or merchandise by truck are required to maintain off-street loading and maneuvering area if they are at least 10,000 square feet in size. This applies to commercial or industrial uses

(not institutional uses necessarily). The applicant notes an area near the proposed trash/recycling enclosure area, behind (opposite side of Gable Road) the school.

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Access/egress/circulation: This starts on page 40 of the applicant’s narrative.

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. Distance of vehicle access from a building is normally 50 feet for residential, commercial and industrial developments. Code is silent for civic uses.

The site substantially abuts the following streets:

Street/Road Name	Public or Private	Street Class (TSP)	Jurisdiction	Improved?
Gable Road	Public	Collector	County	Yes, fully
Firlok Park Blvd	Public	Collector	County	Partial; no sidewalks or other frontage improvements

The site utilizes these streets for access. Vehicle access within the site is within 50 feet in many places. Where there is >50 feet, vehicle proximity still appears reasonable for the use proposed.

Vehicular access spacing, amount, etc. The number and location of accesses along Gable Road is not changing. Some are proposed to be modified. The improvements proposed are focused in areas accessed by Gable Road. All Gable Road accesses meet the minimum 100’ separation and the number over a course of approximately 1,180 liner feet of Gable Road frontage, there are four access points. 1 access point per 295 liner feet is reasonable. No clear reason to remove, consolidate or move an access point.

The number and location of accesses along Firlok Park Boulevard is not changing. None are proposed to be modified and site improvements are not proposed in proximity to this street.

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 (civic), 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.

There is a series of proposed walkways that provides multiple connections within the site.

One question for the Commission is if there are enough paths from the Gable Road sidewalk connected directly to the high school campus. There are such around the driveway approaches

on the eastern half (based on the Gable Road frontage) but none on the west side. Should there be such a walkway by the westernmost driveway approach along Gable Road?

And/or, should there be such a walkway off another adjoining street such as Alexandria Lane? This location coincides with the City of St. Helens' recreation center proposed at 2625 Gable Road (CUP.1.21), which may act as an extension of some school related activities.

What about a path from the southwest side off Firlok Park Boulevard?

In parking lots one acre or larger, pedestrian walkways shall connect from buildings to sidewalks in the adjacent rights-of-way, and shall be provided at least every 150 feet between rows of parking.

This is intended for large parking areas. The high school's parking areas exceed one acre. The applicant acknowledges a lack of walkways from the sidewalk to the school buildings for the parking area "D" (the westernmost parking area along Gable Road). Starting at the most northerly point of the property (also the most westerly point adjacent to Gable Road), there is a distance of over 640 feet to the first walkway directly off the Gable Road sidewalk. This exceeds the 150' distance considerably. Applicant notes that this is intentional to channel pedestrians to walkways that lead to the main entrance.

Again, should there be another path off a Gable Road into the subject property closer to the west side. Or a western path from another adjoining street such as Alexandria Lane?

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.

All pedestrian crossings across vehicle drive aisles are less than 36 feet. Note the pedestrian island within the westernmost Gable Road driveway to maintain this. All walkways appear to be 4 feet wide or more.

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 appear paved. Walkways are illuminated, though, path in the athletic fields is assumed to be illuminated only when field lighting is on.

Access requirements based on type and intensity of use. All accesses have a net width of less than 50 feet. The number of access points is acceptable.

Variances. The applicant talks about access variances but did not apply for any.

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Signs: This starts on page 51 of the applicant’s narrative.

There are several existing signs. One new “St. Helens High School” wall sign is proposed. This section addresses this proposed sign.

Applicable Sign District per SHMC 17.88.050: For Public Lands, PL zoning, the sign district that applies to the sign is the closest other zone to the sign.

The proposed wall sign is closest to Highway Commercial, HC zoning, thus the Commercial/Industrial, sign district applies. This differs from the applicant’s assumptions.

Applicable Sign District Standards: Wall sign cannot exceed 8% of the façade it is proposed to be on, with a maximum individual sign face of 120 square feet (or 199 for facades that exceed 5,000 square feet). If the total sign area measured within one rectangular area is considered (2 x 36 feet) the total area is around 72 square feet. Per the applicant, the façade is just under 17,000 square feet. Proposed sign is within size limitation.

Sign Type Specific Standards: Wall sign cannot be more than 12” from the wall its attached to. It cannot project above a roof line, or the top of a parapet wall, whichever is higher. No external braces, guy wires or similar external (visible) mounting systems shall be used. Proposed sign(s) appear to comply with these provisions. No marquee or mansard roof is involved, which would include other standards.

Illumination Standards: Proposed signage includes illumination via building-mounted wall wash fixtures. The illumination standards of 17.88.125 apply.

Other: A new athletic scoreboard is proposed, adding to an existing one. The building mounted scoreboard will be internally illuminated, which complies with the residential sign district; the athletic fields are adjacent to residential zoned lands, so this differs from the proposed wall sign. In addition, the scoreboard is assumed to be exempt from sign permitting based on 17.88.040(15):

Signs located within a sports stadium or athletic field or other outdoor assembly area which are intended for viewing by persons within the facility. The signs shall be placed so as to be oriented towards the interior of the field and the viewing stands.

Details are few in the application packet. If this is not the case, sign permitting could be required.

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Solid Waste/Recyclables: This starts on page 61 of the applicant’s narrative.

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.

As the high school has been in place for decades and the student capacity is not increasing, the school district has had much experience to be knowledgeable about their waste management needs. Thus, the applicant is using the “waste assessment” method per this chapter to demonstrate compliance. This is logical in this case. Further, the waste enclosure area proposed is substantial and appears compliant.

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Site Development Review: This starts on page 65 of the applicant’s narrative.

Note that this chapter discusses preservation and replacement of tree 6” diameter at breast height. This is in addition to the emphasis of trees greater than 12” diameter at breast height per Chapter 17.132 SHMC.

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Tree Removal/Preservation: This starts on page 78 of the applicant’s narrative.

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.

The applicant provided a tree inventory showing 110 total existing trees. Of those, 35 are proposed to be removed. Of the 35 proposed to be removed, 28 are greater than 6” DBH (ref Site Development Review chapter). In regard to this Chapter, more than 50% of trees greater than 12” DBH are proposed to be preserved, which keeps the replacement ratio for these larger trees at 1:1.

Thus, at least 28 replacement trees are required. Applicant proposes approximately 99 new trees.

A protection program by a qualified professional 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.

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Street/Right-of-Way Standards: Streets and utility discussion starts on page 83 of the applicant’s narrative.

The site substantially abuts the following streets:

Street/Road Name	Street Class (TSP)	Required Min. ROW Width	Current Min. ROW Width	Improved?
Gable Road	Collector	60 feet	≥60 feet	Yes, fully
Firlok Park Blvd	Collector	60 feet	50 feet	Partial; no sidewalks or other frontage improvements

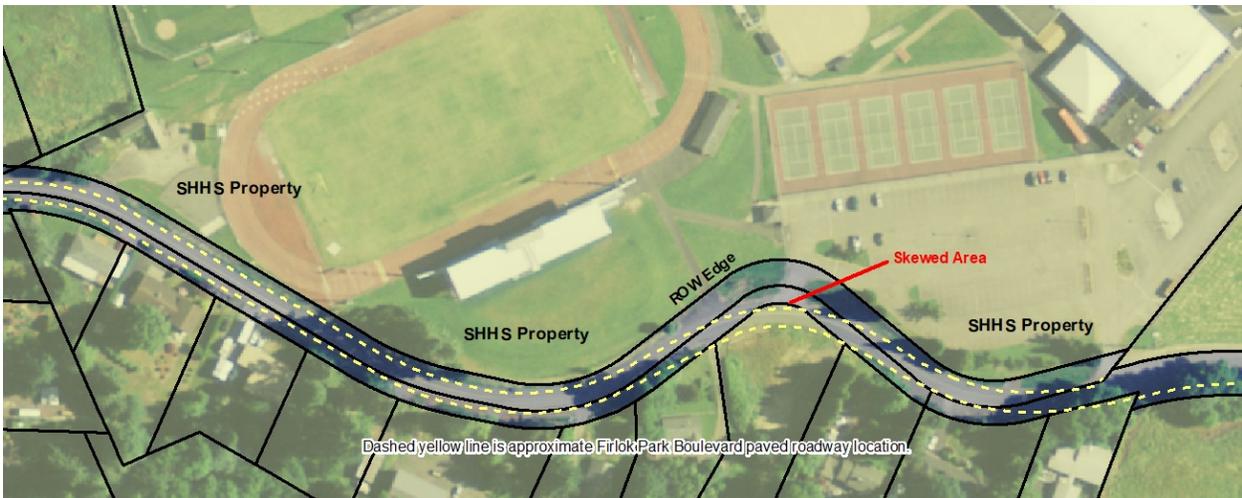
The improvements to the site are concentrated along Gable Road and the northern section of the athletic fields on the west side of the site. Gable Road is fully built. It is proposed to be modified, which will require public improvement plans subject to review by city engineering.

Even though the area adjacent to Firlok Park Boulevard is not proposed to be redeveloped, the scale of the project is such that consideration of advancing public interest is germane for this review process.

Firlok Park Boulevard is less than the minimum right-of-way (ROW) width. Normally, the requirement for right-of-way dedication would be half of the required width (i.e., 30 from ROW centerline). However, a portion the improved street in relation to the right-of-way appears particularly skewed.

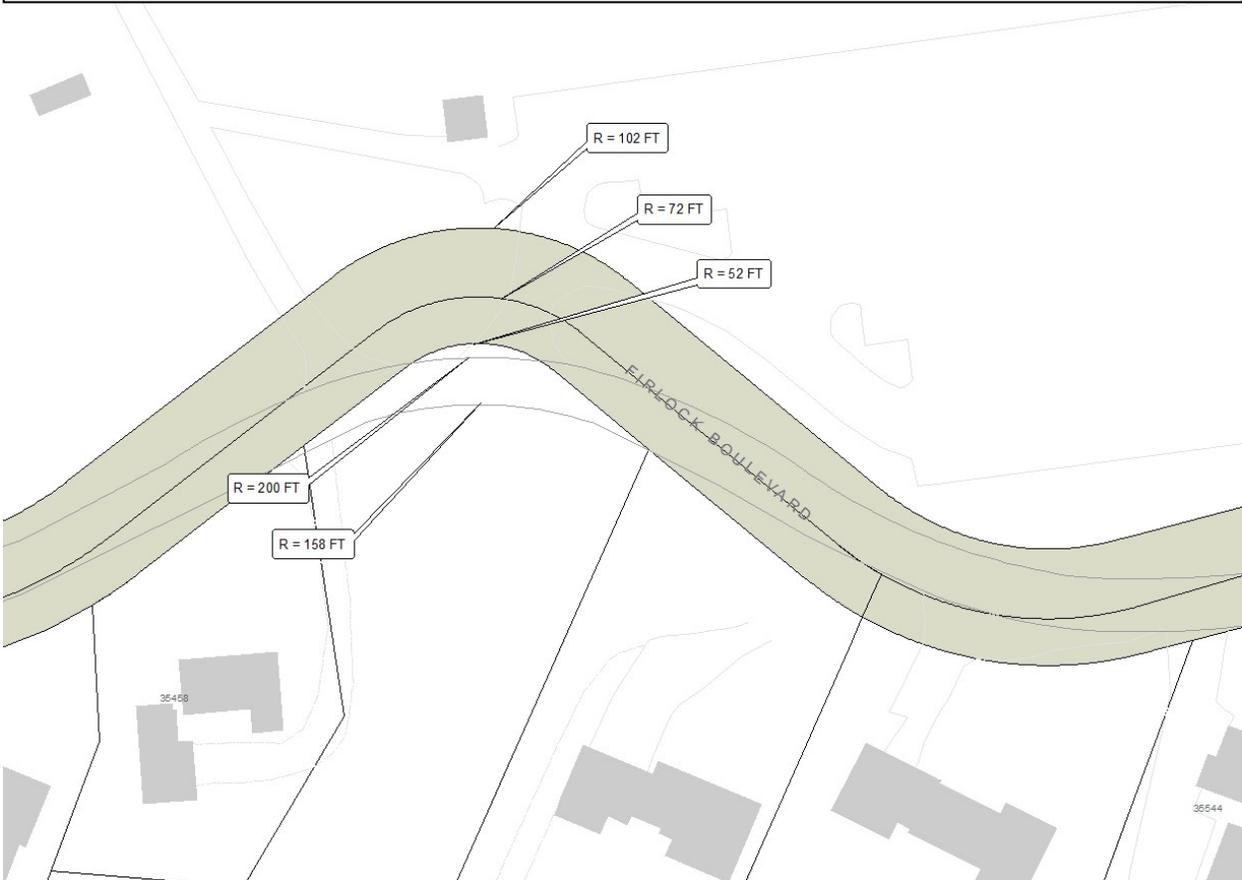
In addition to being skewed, the centerline curve radius of the ROW is less than 100 feet and the paved road itself larger but still well below the normal 500' radius standard for collector streets. For this section, additional right-of-way from the high school property is unlikely needed because road improvements would be less likely to be rebuilt to a lesser curve radius. If 5' was dedicated elsewhere, when Firlok is re-built in the to-be-determined future, there would be more area to straighten the curve out in addition to meeting the standard ROW width requirement.

Staff referenced the surveys for Partition Plat No. 1993-31 and the Firlok Park Subdivision (1951) for the location of the 50' right-of-way on either side of the portion of Firlok Park Boulevard adjacent to the south side of the high school property and that 5' of dedication on either side will achieve the 60 feet centered from these adjacent surveys. There may be some mapping errors. Surveyor will be needed for final confirmations.



Above: image showing the offset between the dedicated right-of-way (ROW) versus the improved roadway of Firlok Park Boulevard.

Below: a closer look at the skewed area and radii of ROW lines and the roadway. City's standards call for a minimum centerline curve radius of not less than 700 feet on arterials, 500 feet on collectors, or 100 feet on other (local) streets. As a collector, Firlok Park Boulevard appears to have a right of way curve radius (assuming county taxlot data reflects things correctly) below local standards. The actual road surface exceeds the local standard but is still below the collector's minimum radius. This discrepancy results in the offset.



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Utility Standards: Streets and utility discussion starts on page 83 of the applicant’s narrative.

Water: City water is available along both Gable Road and Firlok Park Boulevard. Some public water infrastructure is located within the boundaries of the property. The city has water easement on the property per Book 138, Page 444 as recorded in 1959.

Sanitary Sewer: City sanitary sewer is available along Gable Road.

Storm Sewer: On site storm is proposed to be directed to the adjacent right-of-way.

Other: Except for overhead utilities along Gable Road and Firlok Park Boulevard, all utilities are underground now. No new overhead utilities are proposed.

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Trails/bikeways: As collector streets bike lanes are components of both Gable Road and Firlok Park Boulevard. Gable Road is fully built and includes bike lanes. Firlok Park Boulevard lacks frontage improvements along the subject property as well as bike lanes.

Staff does not recommend frontage or any other improvement to Firlok Park Boulevard. Should the project include a way into the property (e.g., from the SW corner) into the site for students (etc.) who walk or bike to school from the SW side? The segment of Firlok Park Boulevard on the east side, between US30 and the high school property (but not the high school property itself) includes a sidewalk (a form of non-motorized safe passage). But this is lacking altogether on the west side. An internal path starting from the SW corner could reduce time spent walking (or riding) to school on a road lacking non-vehicular transportation mode accommodations for those who reside in the SW quadrant of the city.

There is no trail identified in the city’s adopted parks and trails master plan through the subject property.

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Traffic Impact Analysis: The high school’s 1980 expansion increased student capacity from 600 to 1200. Though the currently proposal is substantial, it will not result in an increase of student capacity (will still be around 1,200). As such, the project is neutral from a traffic generation standpoint and no traffic impact analysis is warranted.

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Other Considerations: The School District has the challenge of keeping school services underway during construction. As such, the applicant proposes to temporarily site 11 modular buildings plus a modular restroom building.

For land use purposes, the city can consider this a construction phase since they will be gone for project completion and are on the same site. These are considered temporary; required to be removed before project completion. Temporary fencing is also included to separate the temporary modular campus from construction activities.

Proposed temporary modular classroom buildings are within immediate proximity of trees proposed to be preserved. Existing tree protection measures shall apply to the temporary modular campus and be reflected on plans just like the permanent improvements.

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CONCLUSION & RECOMMENDATION

Based upon the facts and findings herein, staff recommends approval of this proposal with the following conditions:

1. This **Site Development Review** approval is valid for a limited time (to establish the use) pursuant to SHMC 17.96.040. This Site Development Review approval is valid for 1 year. A 6-month extension is possible but requires an application and fee. If the approval is not vested within the initial 1 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. See SHMC 17.96.040.
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 site development review and sign permit with the following additions and/or corrections:
 - i. As per condition 4.
 - ii. Plans for the freestanding metal canopy proposed to cover the bike/skateboard/scooter spaces. Shall comply with Chapter 17.124 SHMC, Accessory Structures.
 - iii. All interior drives and access aisles are required to be marked and signed to indicate direction flow.
 - iv. Wheel stops are required along the boundaries of a parking lot, adjacent to interior landscape area, and along pedestrian ways.
 - v. A protection program by a qualified professional 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 development and/or building permit plan set(s) to ensure contractors and others follow the tree protection plan during site development. This applies to permanent improvements and temporary, including the temporary modular buildings.
 - vi. Applicant shall provide legal descriptions and a map exhibit from an Oregon Registered Professional Land Surveyor for 5' of right-of-way dedication of Firlok Park Boulevard except at the "skewed area" as described and depicted herein. Professional surveyor shall prepare the legal descriptions in cooperation with the city.
 - vii. Final photometric plans.

- viii. Any other condition of the Planning Commission in regards to the PL zoning requirements? Public testimony may be a consideration in this regard.

Is the 10 yard (setback) adjacent to residential property sufficient? Note that vertical landscaping is proposed along the parking area along Gable Road and the corner of the property at abuts Alexandria Lane.

Does the Commission think any new buffering is needed with this change since the non-sport programmed part of the field area of the last 40 years will be developed specifically as playing fields?

- ix. How is the school district going to prevent confusion having the non-bus vehicular drop off/loading area within the parking area for staff only (parking area "C" - see page 4 of applicants narrative)?

Any conditions warranted?

- x. Should there be a walkway leading into the site from the Gable Road sidewalk closer to the west side than proposed?

And/or should there be another path from the west enabling a route separate from Gable Road? For example via Alexandria Lane. Note this is also the location of the City of St. Helens' recreation center proposed at 2625 Gable Road (CUP.1.21), which may act as an extension of some school related activities.

Considerations are walkway for 150' of parking lot standard and 640' distance between most westerly point adjacent to Gable Road and closest path from Gable Road sidewalk into the site. Unless there is a fence or wall, staff does not believe students coming from this direction will walk that extra distance so another path from the west side should be provided.

Remember, applicant's intent is to channel pedestrians to walkways (off Gable Road) that lead to the main entrance.

- xi. Should there be a path from the SW corner into the site from Firlok Park Boulevard?

An internal path starting from the SW corner could reduce time spent walking (or riding) to school on a road lacking non-vehicular transportation mode accommodations for those who reside in the SW quadrant of the city.

- b. Engineering construction plans shall be submitted for review and approval addressing all public improvements including but not limited to changes proposed to Gable Road.

- c. A drainage and stormwater plan certified by a registered professional engineer shall be submitted for review and approval that addresses any increase in runoff from the site and how the potential impacts will be mitigated. Plans shall include oil/water separation.
 - d. Covenant to combine properties shall be recorded on the deed records of the County Clerk for the subject property. Applicant shall provide legal descriptions.
3. The following shall be required **prior to** Certificate of Occupancy by the City Building and project completion:
 - a. All improvements necessary to address the requirements herein, and in accordance with approved plans, shall be in place.
 - b. Firlok Park Boulevard right-of-way dedicated per condition 2 shall be recorded with the County Clerk.
 - c. Any modular building allowed for temporary placement to maintain school operations during construction shall be removed along with all other temporary items such as fencing.
 - d. 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 (or those existing on the modular building permitted in 2010) 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. A 7 foot in height wall for trash, etc. enclosure is allowed.
6. Any new utilities shall be underground. Existing overhead utilities may remain above ground.
7. If new athletic scoreboard is determined to not be exempt based on SHMC 17.88.040(15), sign permitting and compliance with Chapter 17.88 SHMC, Signs shall be required.
8. No plan submitted to the City for approval shall contradict another.
9. Owner/applicant and their successors are still responsible to comply with the City Development Code (SHMC Title 17).

Attachment(s): “cheat sheet” from staff (a review aid for the Commission)

Plan set

APG Memo Dated May 25, 2021 regarding modular buildings

Applicant’s narrative document (May 2021)