

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

Subdivision Preliminary Plat, **SUB.1.25**
Subdivision Variance, **V.1.25**
Sensitive Lands Permit, **SL.1.25** (significant wetlands)
Sensitive Lands Permit, **SL.2.25** (steep slopes)
Sensitive Lands Permit, **SL.3.25** (drainageways)

DATE: August 28, 2025
TO: Planning Commission
FROM: Jacob A. Graichen, AICP, City Planner

APPLICANT: North 8th Street LLC (Shawn Clark)
OWNER: North 8th Street LLC (principal property involved)
*Elks Lodge Homeowners Association (Tract A, Elks Subdivision)
*St. Helens Lodge #1999 BPOE (Lot 1, Elks Subdivision)

ZONING: Mobile Home Residential, MHR and Moderate Residential, R7
LOCATION: At the current northern termini of N. 8th, 9th and 10th Streets lying north of Deer Island Road; also Tract A and Lot 1 of the Elks Subdivision located along Madrona Court.

5N1W-33-00700
*5N1W33AD 1900 & 1901

PROPOSAL: 66 lot Planned Development Subdivision Preliminary Plat

*These properties are only part of SL.1.25 (significant wetlands) related to a proposed extension of a public sanitary sewer line and pedestrian path associated with development of the principal property.

SITE INFORMATION / BACKGROUND

The subject property proposed to be subdivided is approximately 23.68 acres in size and is irregular in topography and contains multiple wetlands and drainages, which restricts how much can be developed. The other properties are involved with this proposal due to a proposed sanitary sewer extension and walking path.

This is a “reboot” (reapplication) of a previous approval. In March of 2022, the Planning Commission this subdivision preliminary plat and associated files. Two Time Extensions were approved (EXT.2.23 and EXT.5.25), each providing an additional year of decision validity. This extended the validity period to September 24, 2025. The original approval expires if at least substantial completion of the subdivision development work (e.g., roads, utilities) is not complete, amongst other things, and there is no final plat application. As physical development work has not started, expiration of the original 2022 decision is inevitable.

Given the reboot nature of this application the 2022 decision is attached. This report relies on that information, providing summaries and new considerations for this 2025 application.

PUBLIC HEARING & NOTICE

Public hearing before the Planning Commission: September 9, 2025

Notice of this proposal was sent to surrounding property owners within 300 feet of the subject property(ies) on August 20, 2025 via first class mail. Notice was sent to agencies by mail or e-mail on the same date.

Notice was published on August 29, 2025 in the Columbia County Spotlight newspaper.

APPLICATION COMPLETENESS

This application was originally received and deemed complete on July 22, 2025.

The 120-day rule (ORS 227.178) for final action for this land use decision is November 19, 2025.

AGENCY REFERRALS & COMMENTS

City Engineering: See attached Engineering Staff Report dated August 28, 2025.

City Water Quality: It appears that the entire subdivision discharges its sewage to the lift station off Madrona. This station is already at capacity during storm events and adding 66 more dwellings will ensure we overflow.

The other concern is that when the station is upgraded to handle the additional waste, the receiving manhole from the lift station pumps may also need to be upgraded to handle the addition.

CRFR: See attached from CRFR in response to August 2025 agency notice.

Columbia County Public Works: The Columbia County Public Works Department has concerns about existing drainage impacted by the proposed subdivision.

Currently, existing open drainageways convey overland sheet flow from the County property into wetlands through multiple low points along the property border. Reviewing the subdivision plans, it appears that the elevation of the North 8th Street LLC property will be raised up about 6' above the current elevation along the property line shared by the County. While the proposed plan set did address drainage from point sources to the south of the County property, it did not address the obstruction of the existing drainageways.

Our concern is that this development will change the existing drainage pattern by obstructing these drainageways and cause flooding and nuisance on our property. The existing drainage pattern from the County property to the North 8th Street LLC property will need to be addressed somehow with this new proposed subdivision.

APPLICABLE CRITERIA, ANALYSIS & FINDINGS

Planned Development Overlay Zone

As a “planned development,” in the eyes of the St. Helens Development Code, this development depends on a Planned Development Overlay Zone. Such was adopted for the subject property via Ordinance No. 3282 in 2022. Note that this approval included a condition that no development allowed using the overlay zone shall preclude manufactured homes.

2024 Ordinance No. 3305 created a time limit for Planned Development Overlay Zone validity, such that it becomes void on January 1, 2035 if not used. The overlay zone is still viable with ample validity time and if this proposal is successful, the overlay zone will be used and vested well before 2035.

2024 Ordinance No. 3305 also increased the initial preliminary development plan approval to two years.

A summary of the standards proposed for this development, as possible as a planned development, is **attached as Exhibit A from the 2022 effort**.

Cul-de-sac and access to the subdivision

Access options are limited given surrounding development, wetlands and topography. One of the consequences of this is a larger than normal cul-de-sac.

Normally, cul-de-sacs shall be no more than 400’ long and not provide access to more than 20 dwelling units per normal standards. The proposed cul-de-sac exceeds 1,000’ in length and provides access to approximately 44 lots. This is the reason for the **Subdivision Variance**.

Being longer than 150’ the cul-de-sac needs to terminate with a turnaround area meeting fire code standards (which exceeds the city’s normal cul-de-sac end standards). Plans show a 96-diameter cul-de-sac end, exclusive of sidewalks, which meets the minimum per the fire code.

Street connections are proposed by extension of N 8th and N 9th Streets. Pedestrian-only paths are proposed on the southwest side via N. 10th Street (based on the 2022 decision) and from Madrona Court from the northeast side (as originally proposed). The Madrona Court path is in conjunction with a sanitary sewer extension; this is why the “Elks Lodge” properties are involved.

As expected, and based on the traffic impact analysis, N. 9th Street will have the greatest vehicle impact and use. Though N. 8th and N. 9th Streets between the subject property and Deer Island

Road have roadway improvements, there is a consideration of how new improvements align with the old. As shown below, the N 8th Street's alignment is unquestionable; it was developed more recently has, curb and sidewalk, and aligns well. N 9th Street is different lacking defined edges that curbs provide and with the roadway section heavily skewed to the west side. Such misalignment is inappropriate for new streets; new street will have its roadway improvements centered in the right-of-way (ROW), and some of the *existing* N. 9th Street will need to be modified to transition to that.



CFFR provided comments for this 2025 effort, noting the limited access concerns and the complications that poses in the emergency event, street parking concerns and cul-de-sac standards concerns.

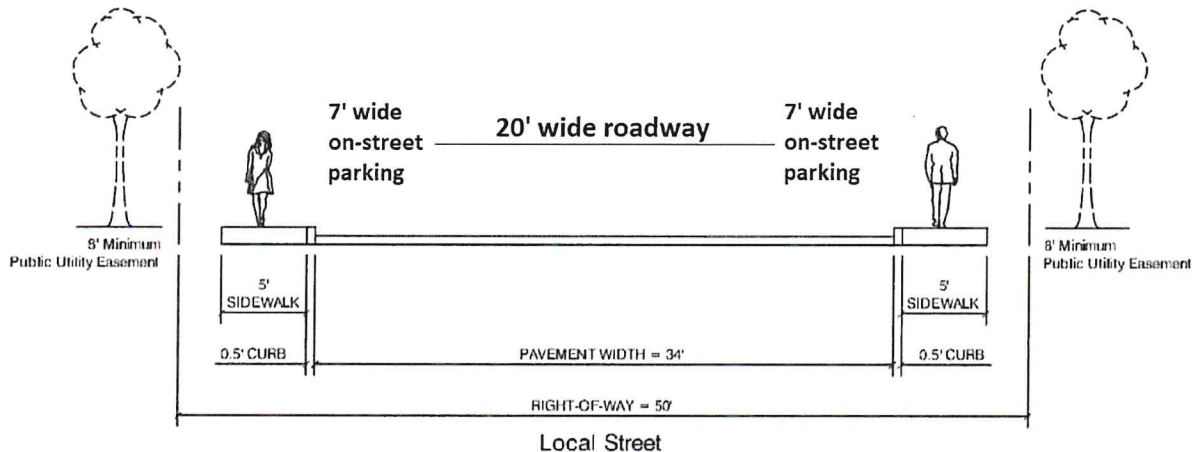
- Limited access concerns.

Note that the 2022 decision referenced Oregon Fire Code Section D107, that requires developments of one- or two-family dwellings (such as that proposed) where the number of dwelling units exceeds 30, shall be provided with two separate and approved fire apparatus access roads. In this case about 44 lots proposed north of the proposed N. 8th/N. 9th Street intersection will have one vehicle access road. A condition was (and still is) included noting needing sprinkler systems for the effected dwellings.

- Street parking concerns. **This is something for the Commission's consideration.**

The proposed street is a standard 50' right-of-way with 34' pavement width. CRFR notes concerns emergency access.

The standard for a local street includes a 20' wide roadway for two-way traffic with a 7' wide swath on each side for on-street parking for a total roadway width of 34 feet. Curb and 5' wide sidewalk are intended to be on either side.



Based on the street being a local classified street, alone, probably doesn't justify cross section changes. **However, the Variance for the extra long and dwelling burdened cul-de-sac could be justification for a modified street section, such as a 34' paved width, with on-street parking on one side only for N. 9th Street.** $34' - 7' = 27'$; and $27/2 = 13.5'$ wide travel lanes. This could apply to the cul-de-sac portion only. The City Engineering staff report mentions this issue.

- Cul-de-sac standards

The end of the cul-de-sac shows a 96' diameter, exclusive of sidewalks, meeting the standards of the fire code for fire apparatus turnaround. "No parking" signage/markings was a condition of the 2022 decision (and is still proposed).

Note to remedy subdivision infrastructure construction traffic impacts to the neighborhood, in 2022 the Commission recommended use of adjacent city or county Public Works property, which was added as a recommendation condition.

Sanitary Sewer considerations

The Commission's March 2022 approval of this matter is important as it pertains to sanitary sewer, as it wasn't until later in 2022 with the Comstock Subdivision that the city's sanitary sewer deficiencies were considered in land use decisions. **This issue persists, and must now be considered for this 2025 effort.**

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 that the sanitary sewer main in the N/S 4th Street right-of-way has a portion currently operating at or above 100%. This is much greater than the industry and city standard 85% “at capacity” flows and is a portion of the conveyance system between the subject property and the wastewater treatment plant.

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. The N/S 4th Street sewer main is identified as a priority 1 basin 5 capacity improvement. 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 \$3,400, and this estimated amount is determined to be a fair share quantity for this proposal.

- Though denial of this proposal itself does not warrant a moratorium or public facilities strategy as there is no prior stoppage or restriction of permits, authorizations, or approvals*, the city recognizes that the sanitary sewer conveyance problems identified in the WWMP are widespread and denial could set a precedence of action that if continued for projects under similar circumstances, could be construed as a pattern or practice that at some point could warrant a moratorium or public facilities strategy.

*Per ORS 197.524 a local government is required to adopt a public facilities strategy under ORS 197.768 or a moratorium on construction or land development under ORS 197.505 to 197.540 when it engages in a pattern or practice of delaying or stopping the issuance of permits, authorizations or approvals necessary for land divisions or construction due to the shortage of public facilities (like sanitary sewer).

Another sanitary sewer consideration for the Commission not described above is Pump Station #5 at 240 Madrona Court, which is close to the area where the new sanitary sewer main will connect with the existing infrastructure. City staff has noted that the pump station is near its capacity limit now and the additional 66 residential lots of this subdivision could result in overflows.

Oregon DEQ has indicated that a predesign report and capacity study are needed to show what improvements are needed for Pump Station #5 to function adequately and not overflow. Without the improvements to the pump station, it can't handle the proposed development.

Storm Sewer considerations

Columbia County's Public Works shops property abuts the subject property. For this 2025 proposal, Columbia County noted concern about grading, fill, and obstruction of the existing drainageways from their property into the subject property. They are concerned about ponding and flooding of the County property. Drainage plans need to show how this will not happen.

CONCLUSION & RECOMMENDATION

Based upon the facts and findings herein, staff recommends approval of this proposal with conditions. Findings of a new decision will need to be updated too. The conditions from the 2022 decision with **potential new conditions in red** follows:

1. **This Subdivision Planned Development preliminary plat approval shall be effective for a period of two years from the date of approval.** The approval shall become void if a final plat prepared by a professional registered surveyor in accordance with (1) the approved preliminary plat, (2) the conditions herein, and (3) the form and content requirements of the City of St. Helens Development Code (SHMC Title 17) and Oregon Revised Statutes is not submitted within the two-year approval period. **Note: two time extensions are possible per SHMC 17.148.030(3).**
2. **The following shall be completed prior to submission and the City's acceptance of a final plat application:**
 - a. A Planned Development overlay (e.g., via file PD.1.22) shall be adopted and in effect for the subject property.
 - b. Homeowners Association (HOA) and CC&Rs for establishing the HOA shall be approved (see condition 8).
 - c. Engineering/construction plans for all public and other applicable improvements shall be submitted to the City for review and approval in compliance with all City of St. Helens laws and standards and in accordance with the conditions herein. As specific conditions of approval, these plans shall include:
 - i. Curb, sidewalk and street trees (i.e., frontage improvements) along portions of streets that will not abut buildable lots as explained in condition 2.e, *The Full Completion Method*. Street trees not required along open space tracts.
 - ii. Incorporate tree plans per condition 2.f. A protection program by an **qualified professional 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 development and/or building permit plan set(s) to ensure contractors and others follow the tree protection plan during site development.
 - iii. The proposed intersection of N.8th and N. 9th Streets shall be as near as 90 degrees as possible. Angle less than 60 degrees is prohibited.
 - iv. No-parking signage/markings at the cul-de-sac turnaround.

- v. Joint mailbox facility(ies) shall be included per City and USPS (Postmaster) standards.
 - vi. Streetlights are required at each intersection and at such locations to provide overlapping lighting to sufficiently illuminate the street. New streetlights shall use LED fixtures.
 - vii. Utility easements shall be at least 15' wide for linear improvements such as sanitary sewer lines.
 - viii. Any public improvement shall be legally and physically accessible.
 - ix. Minimum cover of pipe shall be 18 inches for ductile iron pipe and 36 inches for nonreinforced pipe.
 - x. A blow off shall be installed at the end of any water main that does not loop or reconnect to the public system.
 - xi. City requires a minimum 95% of the maximum density be achieved for trench backfill and in the public right-of-way.
 - xii. Easement or right-of-way, and improvements for non-vehicular access between N. 9th and N. 10th Streets.
 - xiii. Improvements to Sanitary Sewer Pump Station #5 to be able to accommodate the proposed development (e.g., without overflow). These improvements shall be based on the appropriate analysis (e.g., predesign report and capacity study).
 - xiv. Transition of existing skewed N. 9th Street roadway to the new portion of N. 9th Street.
 - xv. No parking along the cul-de-sac (no outlet / dead end) portion of N. 9th Street to help ensure adequate emergency response??? *If the Commission considers this, we'll need to discuss where the "no parking" should go.*
- d. ~~Prior to or with submission of engineering/construction plans per condition 2.e,~~ a drainage plan and full stormwater report shall be submitted that includes methods of downstream conveyance and pre and post conditions. The proposed development shall mitigate the increased stormwater flows from the site so that the increased runoff will not impact the downstream flows. Plans shall demonstrate how upstream properties will not be impacted by fill and grading, for example, by downstream drainage obstruction and resulting ponding and flooding. Final construction plans for the subdivision shall incorporate related storm water aspects.

- e. *The Full Completion Method.* **All public improvements shall be completed, in place and acceptable to the City.** The only exception to this is that portions of sidewalk that abut buildable lots created by this subdivision where there may be a driveway approach are often not built until the lot is developed. Though some portions of sidewalk will be required where there will be no driveway approach such as corners and along non-buildable tracts. For these portions of sidewalk allowed to be left unfinished for the final plat, a performance guarantee will be required prior as approved by City Engineering. Completion includes providing final approved as-build plans to the City and any other guarantees (e.g., bonds) of workmanship or guarantees of performance for public improvements that may required;

Or

The HB 2306 Method (Oregon Laws Chapter 397). **All public improvements shall be “substantially completed,” in place and acceptable to the City.** **“Substantial completed”** means the city, county or other appropriate public body has inspected, tested and found acceptable under applicable code requirements, unless the parties agree to a lower standard: (A) The water supply system; (B) The fire hydrant system; (C) The sewage disposal system; (D) The storm water drainage system, excepting any landscaping requirements that are part of the system; (E) The curbs; (F) The demarcating of street signs acceptable for emergency responders; and (G) The roads necessary for access by emergency vehicles. The remaining public improvements are secured with some type of financial guarantee such as a bond. Other guarantees (e.g., bonds) of workmanship or guarantees of performance for public improvements may also be required. As-build plans shall be required unless insufficient work will be done per this “substantially completed” option, in which case the as-build plans shall be bonded.

- f. A tree plan for the planting, removal, and protection of trees by a certified arborist pursuant to SHMC 17.132.025 shall be submitted to the City for review and approval. The plans will need to detail the inventory of each individual property involved (three total) separately for the purposes of determining the 50% retainage provision and replacement trees.
- g. Areas where natural vegetation has been removed, and that are not covered by approved landscaping, shall be replanted pursuant to SHMC 17.72.120. This includes the proposed lots to be developed to show how the lot themselves will be covered to prevent erosion, stream sedimentation, ground instability, or other adverse on-site and off-site effects or hazards before development of that specific lot commences.
- h. Restoration (of impacts from the 2019 logging activity and proposed impacts), protection measures and guarantees of plant survival per SHMC 17.40.055(6) shall be required for all previous impacts and those proposed in the wetland

protection zones of wetland D-10 and D-11. Materials and methods subject to city review and approval. As there are three separate properties involved, each with different ownership and two of which are not part of the subdivision itself, this may result in three different sets of documentation (e.g., management plans), contracts, etc.

3. In addition to compliance with local, county, state and other requirements, the following shall be included on/with (for recordation) the final plat:

- a. Minimum 8' wide public utility easements will be required along the street frontage of all lots (and tracts) unless a greater width is determined necessary by City Engineering.
- b. All utility easements necessary, as identified on approved engineering/construction plans shall be included on the final plat.
- c. The County Surveyor shall approve the name of the plat.
- d. Easement or right-of-way for non-vehicular access between N. 9th and N. 10th Streets.
- e. Right-of-way dedication for the northerly continuation of the N. 10th Street right-of-way.
- f. Access control guarantees in a form approved by the city for the extension of N. 10th Street. This shall be a note on the plat as approved by the city.
- g. Tracts shall be identified as to purpose.
- h. Declaration of Protective Covenants, Conditions and Restrictions (CCRs) and Establishment of a Homeowners Association (HOA) shall be recorded with and noted on the final plat for HOA responsibility for common improvement maintenance (see condition 8).
- i. Conveyance of tracts and any other common area to the Planned Development's Homeowner's Association.

4. Prior to any construction or development of the subject property to develop this subdivision:

- a. Performance guarantees (e.g., performance bond) as approved by City Engineering shall be required for storm drainage systems, grading and erosion control. In addition, engineering/construction plans shall be approved.
- b. Applicant shall provide a copy of the approved 1200-C permit from Oregon DEQ.

- c. Applicant shall provide a copy of USACE approval of this proposal.
5. **After completion of construction and City approval, all public improvements shall be guaranteed** (e.g., warranty bond) for at least two years as to workmanship in a form and value as required by City Engineering.
6. **The following requirements shall apply to the development of the lots of this Subdivision:**
- a. If the “*HB 2306 Method*” is chosen under condition 2.e, certificate of occupancy for residential dwellings shall not be granted if **all public improvements are not completed, in place and acceptable to the City**. This includes providing final approved as-build plans to the City and release of any and all financial guarantees for improvements used to allow submission of the final plat or recordation of the final plat, before completion of said improvements.
 - b. Building permits for Lots created by this Subdivision cannot be accepted until the final plat is recorded.
 - c. If not otherwise recorded with the final plat as required, a Declaration of Protective Covenants, Conditions and Restrictions (CCRs) and Establishment of a Homeowners Association (HOA) shall be recorded (see condition 8).
 - d. Curb/sidewalk shall be completed and street trees will be required along all streets as lots are developed.
 - e. Areas where natural vegetation has been removed, and that are not covered by approved landscaping, shall be replanted pursuant to SHMC 17.72.120.
 - f. Lots north of the proposed N. 8th/N. 9th Street intersection shall have automatic sprinkler systems as required by Oregon Fire Code Section D107 and required as a condition of approval of the subdivision variance of this proposal.
 - g. Sensitive Lands Permit will be required for any proposed structure to be placed or constructed on slopes of 25% or greater per Chapter 17.44 SHMC.
 - h. 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 \$3,400.
7. The zoning standards for this development shall be those as proposed per **Exhibit A**, attached hereto.

8. Declaration per ORS Chapter 94 that establishes the Planned Community **shall be recorded with the final plat**. Subject to review and approval by the City, it shall include the following:
- a. A Planned Development Homeowners Association formed as a nonprofit corporation.
 - b. Bylaws.
 - c. Specific language that prohibits the Homeowners Association from selling, transferring, conveying or subjecting to security interest of any platted open space or wetland tract without City of St. Helens approval.
 - d. The Planned Development Homeowners Association shall be responsible for all common improvements including but not limited to any open space tract, wetland tract, trail, stormwater quality facility (see condition 11), and subdivision entry monument signage.
 - e. Provisions for the City to veto dissolution of the Homeowners Association or have the right to assess owners for taxes and maintenance or lien properties.
 - f. Responsibility for common improvement maintenance. This includes but is not limited to the long term operation and maintenance of the water quality facilities and wetland responsibilities.
 - g. Per condition 12.
 - h. As applicable per condition 2.h.
9. Any new sign (e.g., entrance monument signs for the development) requires a sign permit prior to installation.
10. All new utilities shall be underground pursuant to SHMC 17.152.120.
11. The city will not accept any open space, wetland, or stormwater facility tract or improvement. Ownership shall belong to the Homeowners Association of this Planned Development.
12. This planned development shall not preclude (prevent) manufactured homes.
13. 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.

14. Owner/applicant and their successors are still responsible to comply with the City Development Code (SHMC Title 17).
15. The Planning Commission recommends consideration of the use of adjacent City or County Public Works Properties (accessed from Oregon Street) as access for construction vehicles for construction of the subdivision infrastructure (not home building after the infrastructure is in place). The purpose would be to lessen construction traffic in existing residential neighborhoods.

Attachment(s):

Exhibit A from the [2022 effort](#) (proposed Planned Development standards)

Engineering Staff Report dated August 28, 2025

CRFR in response to August 2025 agency notice

St. Helens Wastewater Collection System New Sewer Connection Surcharge memo dated December 1, 2022 (excerpts: pgs. 1-6, 16, and 25-26)

Exhibit B, City Engineering Comments from the [2022 effort](#)

Exhibit C, Area Connectivity Map from the [2022 effort](#)

Exhibit D, General Conditions N. 10th, N. 9th, and N. 8th Streets from the [2022 effort](#)

Applicant's Planned Development Narrative (includes copy of DSL permit) from the [2022 effort](#)

Applicant's Density Calculations from the [2022 effort](#)

Applicant's Sensitive Lands Narrative from the [2022 effort](#)

Applicant's Transportation Impact Study (except Appendix B, traffic data) from the [2022 effort](#)

Applicant's Preliminary Stormwater Report (except Appendix C, Section 401 WQC-Post Construction Submission Checklist and Appendix D, Stormwater Calculations) from the [2022 effort](#)

Applicant's plan set from the [2022 effort](#)

*NORTH 8TH STREET PLANNED DEVELOPMENT STANDARDS

The base standards the MHR zone, those which can deviate as a Planned Development, and those proposed:

PLANNED DEVELOPMENT STANDARDS TABLE

STANDARD	MHR ZONING DISTRICT	PD ALLOWS FLEXIBILITY?	PROPOSED
Min. lot size	5,000 s.f. for detached single-family dwellings and duplexes	Yes	3,690 s.f. for detached single-family dwellings and duplexes
Min. lot width at building line (interior lots)	50 feet for detached single-family dwellings and duplexes	Yes	29 feet for detached single-family dwellings and duplexes
Min. lot width at building line (corner lots)	50 feet for detached single-family dwellings and duplexes	Yes	43 feet for detached single-family dwellings and duplexes
Min. lot width at street (standard)	50 feet for detached single-family dwellings and duplexes	Yes	29 feet for detached single-family dwellings and duplexes
Min. lot width at street (cul-de-sac)	30 feet	Yes	30 feet
Min. lot width at street (flag lot)	20 feet	Yes	20 feet
Min. lot depth	85 feet	Yes	85 feet
Min. front yard (setback)	20 feet	Yes (except along perimeter of PD and for garage structures which open facing a street)	20 feet (20 feet required along perimeter of PD and for any garage structure which opens facing a street)
Min. side yard (setback)	5 feet for interior lots and 10 feet for sides of corner lots along street for detached single-family dwellings and duplexes	Yes	4 feet all sides for detached single-family dwellings and duplexes
Min. rear yard (setback)	10 feet	Yes (except along perimeter of PD)	10 feet (10 feet along perimeter of PD)
Min. interior yard (building/structure separation)	6 feet	No	6 feet
Max. building height	35 feet	Yes	35 feet
Max. lot coverage	Buildings and structures shall not occupy more than 40% of the lot area for detached single-family dwellings and duplexes	No	Buildings and structures shall not occupy more than 40% of the lot area for detached single-family dwellings and duplexes
Min. landscaping	25% of the lot area	No	25% of the lot area

No other code exceptions or modifications are proposed.

*Final subdivision name requires approval by the County Surveyor. This is a preliminary name and may change.

February 2022



ENGINEERING STAFF REPORT

PROJECT/SITE:

REPORT DATE

08/28/2025

PROJECT NAME

Boulder Ridge Subdivision

PREPARED BY

Alexander Bird

CONCLUSIONS/RECOMMENDATIONS

STREETS

- There needs to be a blended transition to existing pavement on N 9th Street to connect to the proposed street limits. The existing street pavement is slightly skewed and is not in the middle of the Right of Way Limits on N 9th Street. The Public Improvements Plans do not account for this pavement transition, and more details need to be provided. The N 8th Street pavement does not require a transition segment.
- The Fire Marshall stated some concerns regarding clear width along the drive isles. The 34-foot paved cross section supports 20' of clear travel lanes and 7' for on-street parking on both sides. The plans show 8' parallel parking spaces which reduces the 20' of clear travel lane width to 18'. To meet the 20' clear width requirement, there needs to be additional areas striped for No Parking for fire access or revise the parking width to be 7'.

SEWER

- The proposed sewer main from the subdivision is draining towards Pump Station #5. There are capacity concerns if the additional 66 Lots are draining to this Pump Station. With the increased flows, the likelihood of overflows is significant. DEQ has indicated that a predesign report, and capacity study needs to be completed by the developer and improvements to the pumps/conveyance system need to be done. The design must meet the ability to not overflow in the 5-year, 24-hour storm. A land use compatibility statement is also needed as well.
- Sewer Capacity (non-SDC) fee applies. Project is in the N 11th Sewer Basin which flows through the North Willamette and Interceptor Basins before going to the Wastewater Treatment Plant. The fee is \$3,400 per new upstream EDU.

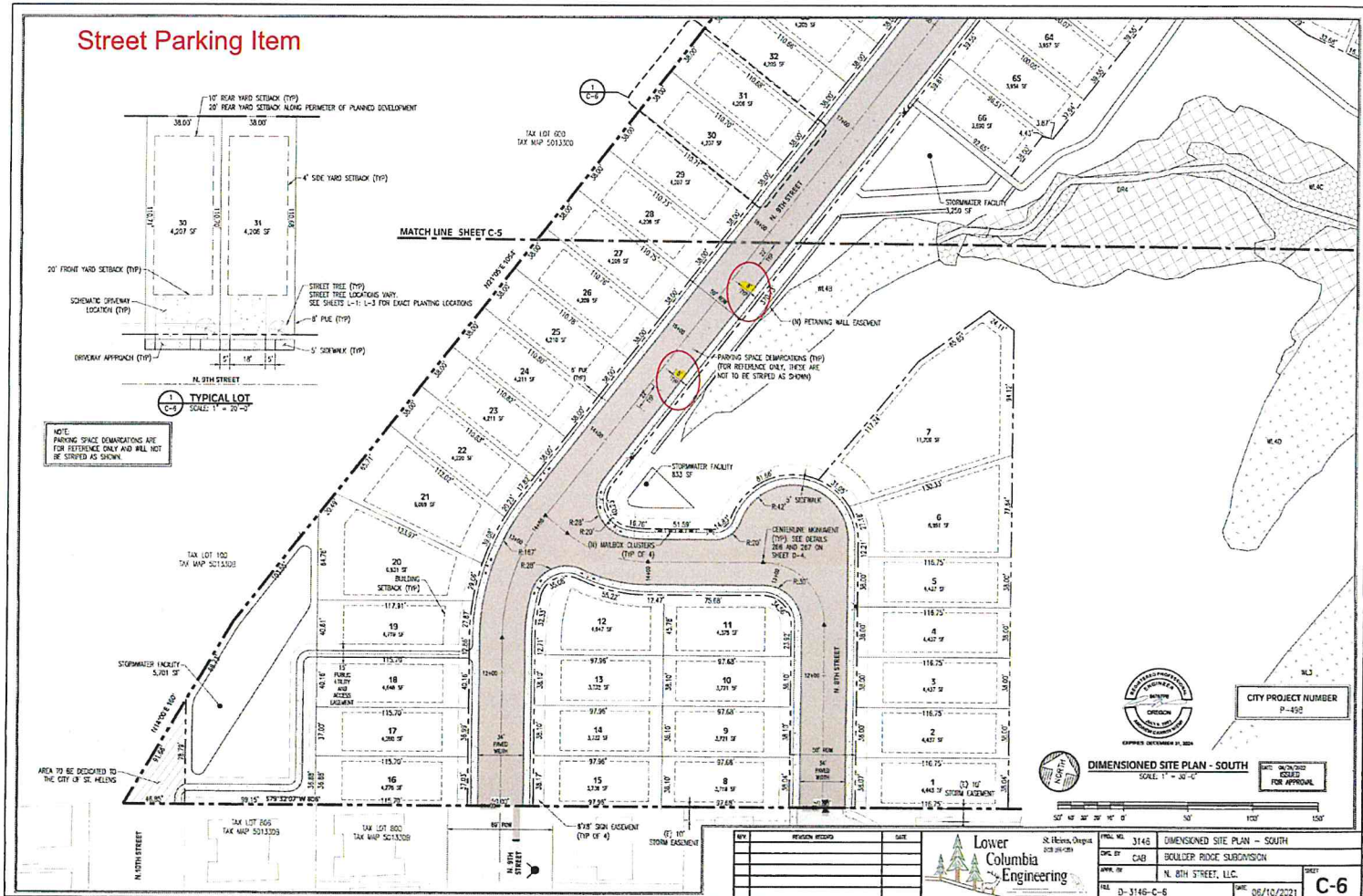
STORM

- Columbia County has voiced concerns about drainage on the west side of Lots 20-43. Please ensure that the grades will continue to follow the natural drainage path and not cause any ponding issues on the County's property – Tax Lot 600 Tax Map 5013300.

WATER

- No major concerns with water supply. Plans show gate valves every 500' or less along the water main per Public Works direction.

Street Parking Item



STRIPING LEGEND

AREA WHERE CURB TO BE PAINTED YELLOW FOR FIRE LANE/NO PARKING

NOTE

1. ALL STREETS, CURBS AND CURB SIDEWALK DROPS SHALL BE PAINTED WITH SITE DEVELOPMENT. ESPECIALLY PAINTED SIDEWALK AREAS SHOWN WITHIN THIS PLAN INDICATE WHAT PORTIONS OF SIDEWALK SHOULD BE CONSTRUCTED WITH SITE DEVELOPMENT. ALL OTHER SIDEWALK SHALL BE PAINTED BY THE HOMEOWNER.

Street Parking Item

Additional No Parking Striping required if driveway access isle is not met.



CITY PROJECT NUMBER
P-498



OVERALL STRIPING AND SIGNAGE PLAN
SCALE: 1" = 50'-0"

DATE: 08/16/2021
FOR APPROVAL



FILE NO.	3145	OVERALL STRIPING AND SIGNAGE PLAN
DESIGN BY	CAB	BOULDER RIDGE SUBDIVISION
DATE	07/01/2021	
PROJECT NO.	3-3145-L-5	
SHEET NO.		L-5



Columbia River Fire & Rescue

ADMINISTRATION OFFICES

270 Columbia Blvd * St Helens, Oregon * 97051
Phone (503)-397-2990 * www.crrf.com * FAX (503)-397-3198

SUB. 1.25
AUG 2025

To: City of St Helens Planning Commission

From: Eric Smythe, Fire Chief

Re: North 8th St "Boulder Ridge" subdivision

The Fire District has reviewed the plans presented in the email dated August 19, 2025, and has the following concerns regarding the project:

1. ****Access and Egress Limitations****: North Eighth Street originally had a dead end. With the addition of 66 residential buildings, access and egress will be extremely limited. In the event of an evacuation, having only one road in and out could pose a significant problem. The area adjacent to the project has limited access and a heightened risk for wildland fire incidents that may necessitate an evacuation, potentially causing critical traffic issues. One road serving up to 500 residents will create a bottleneck during emergencies.
2. ****Street Parking Concerns****: If the plan allows street parking on both sides of the road, this will pose challenges for emergency response. A 34-foot-wide street, with vehicles parked on both sides, could reduce the usable road width by approximately 18 feet, leaving only 14 feet for actual access and egress. This width is insufficient for two vehicles to pass safely. An operational fire apparatus equipped with tools and equipment typically requires about 10 feet of width.
3. ****Cul-de-Sac Standards****: The proposed cul-de-sac does not meet current driveway standards. Columbia County requires a 96-foot turnaround for cul-de-sacs, while the plan as presented only provides a 48-foot turnaround.

The Fire District supports the City of St. Helens' growth and expansion; however, the increasing density of housing presents serious challenges for emergency services due to limited access and egress. We urge you to consider these concerns when deciding whether to approve this project.

RECEIVED

AUG 25 2025

CITY OF ST. HELENS



EXCERPT FOR
FILE SUB. 1.25 et. al.
PAGES 1-6, 16, & 25-26

St. Helens Wastewater Collection System New Sewer Connection Surcharge

December 1, 2022
Revision 01

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

TABLE OF CONTENTS

SECTION 1 – BACKGROUND	3
1.1 Wastewater Masterplan 2021 Update.....	3
1.2 New Development Sewer Surcharge	4
SECTION 2 – ST. HELENS SEWER TRUNKLINE BASINS.....	5
2.1 Sanitary Sewer Trunk Basins Methodology.....	5
2.2 Allendale Sewer Basin	7
2.3 Diversion Trunk.....	8
2.4 Firlock Sewer Basin.....	9
2.5 Gable Sewer Basin	10
2.6 The Interceptor	11
2.7 Matzen Sewer Basin.....	12
2.8 McNulty Sewer Basin	13
2.9 Middle Trunk Sewer Basin	14
2.10 Millard – OPR Sewer Basin	15
2.11 North 11th Sewer Basin.....	16
2.12 North Willamette Sewer Basin.....	17
2.13 Pittsburg Sewer Basin.....	18
2.14 Port Sewer Basin.....	19
2.15 South Trunk Sewer Basin	20
2.16 Southwest Sewer Basin	21
2.17 Sunset Sewer Basin	22
2.18 Sykes Sewer Basin	23
2.19 Vernonia Road Sewer Basin.....	24
SECTION 3 – SEWER SURCHARGE CHART.....	25
SECTION 4 – EQUIVALENT DWELLING UNIT CONVERSION	26

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.

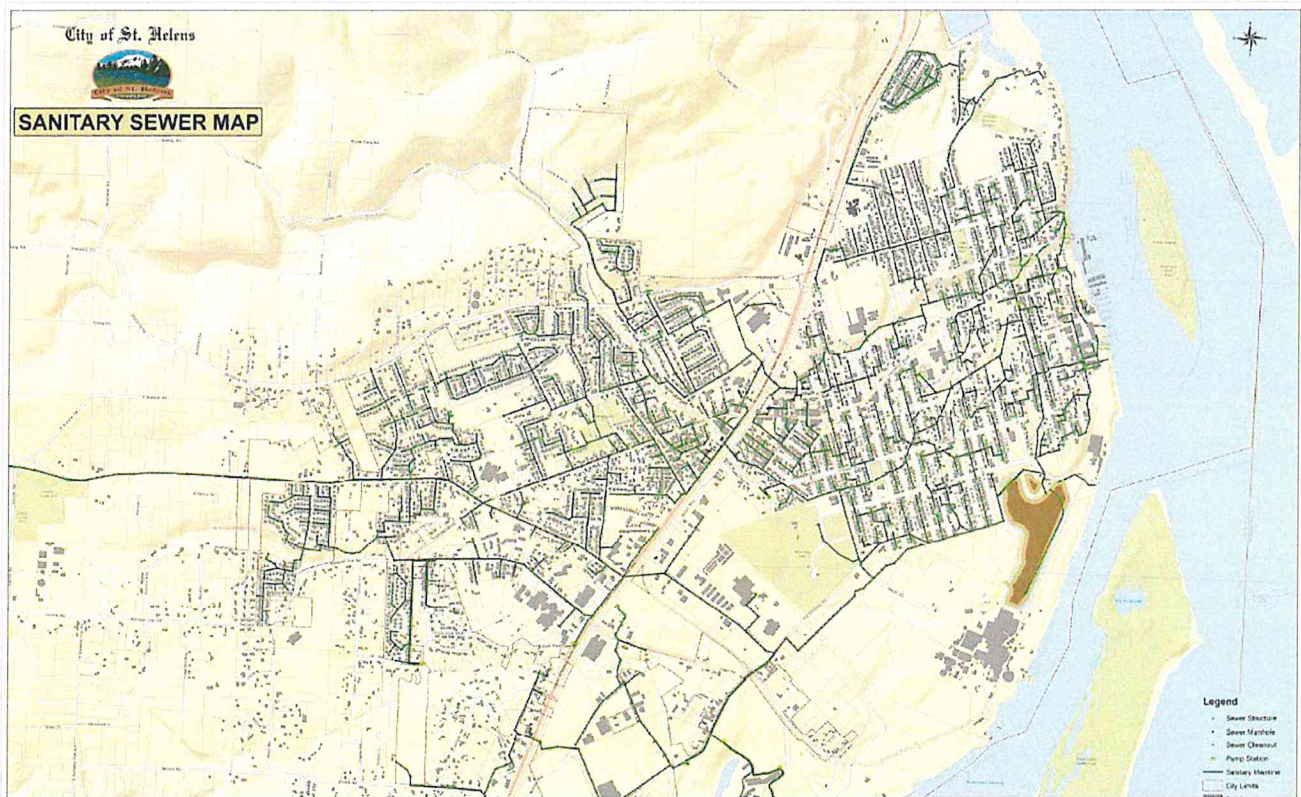


Figure 1.1.A St. Helens Sanitary Sewer Map

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.

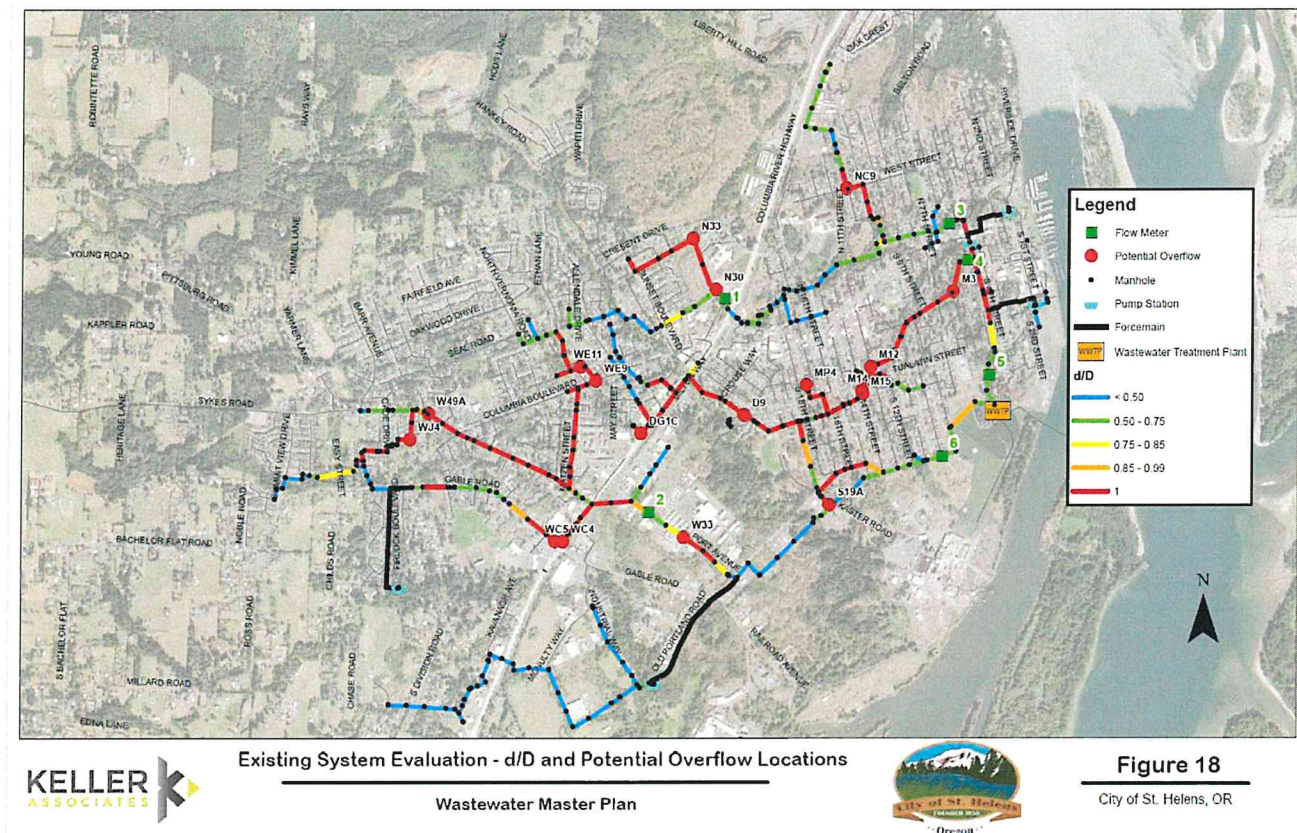


Figure 1.1.B Existing Sanitary Sewer Evaluation Map (2021 WWMP)

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.

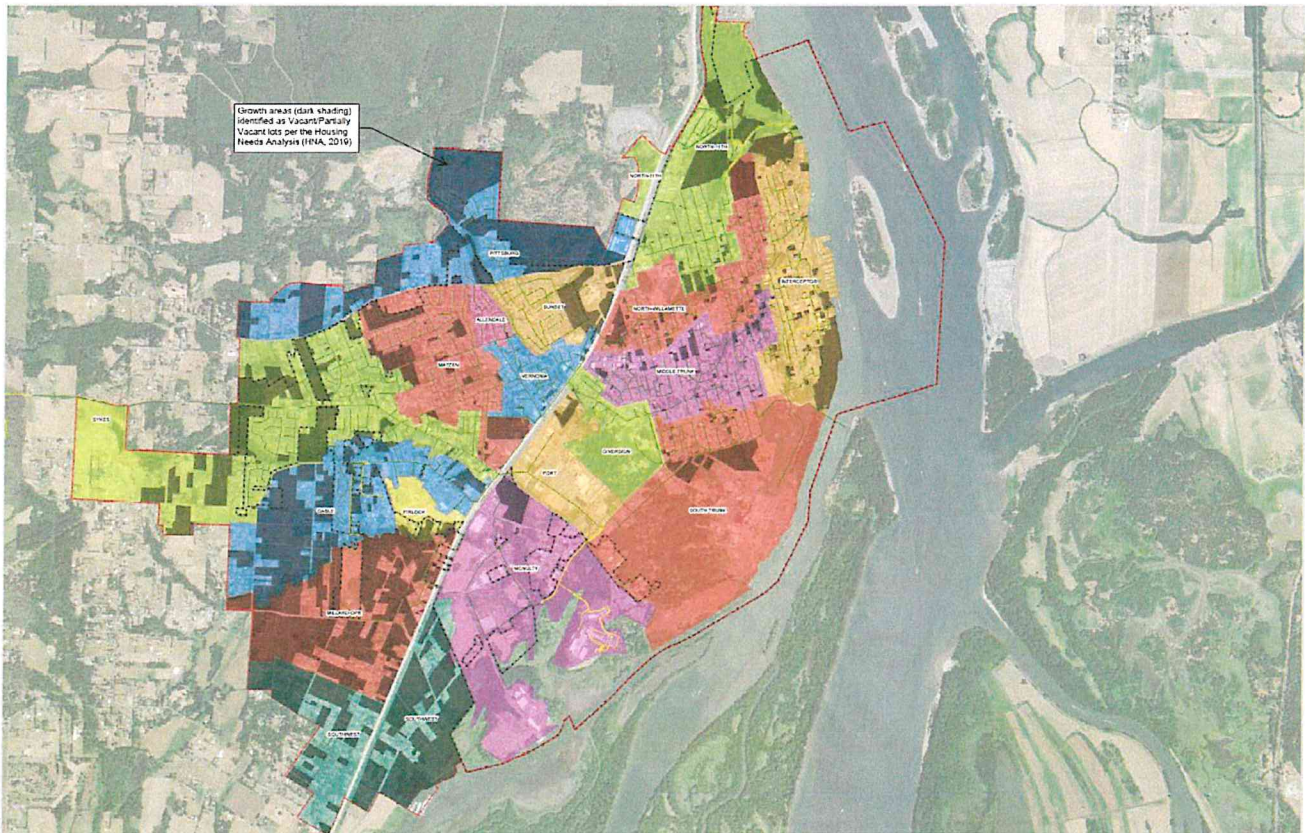


Figure 2.1.A St. Helens Sanitary Sewer Trunkline Basin Delineations

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.

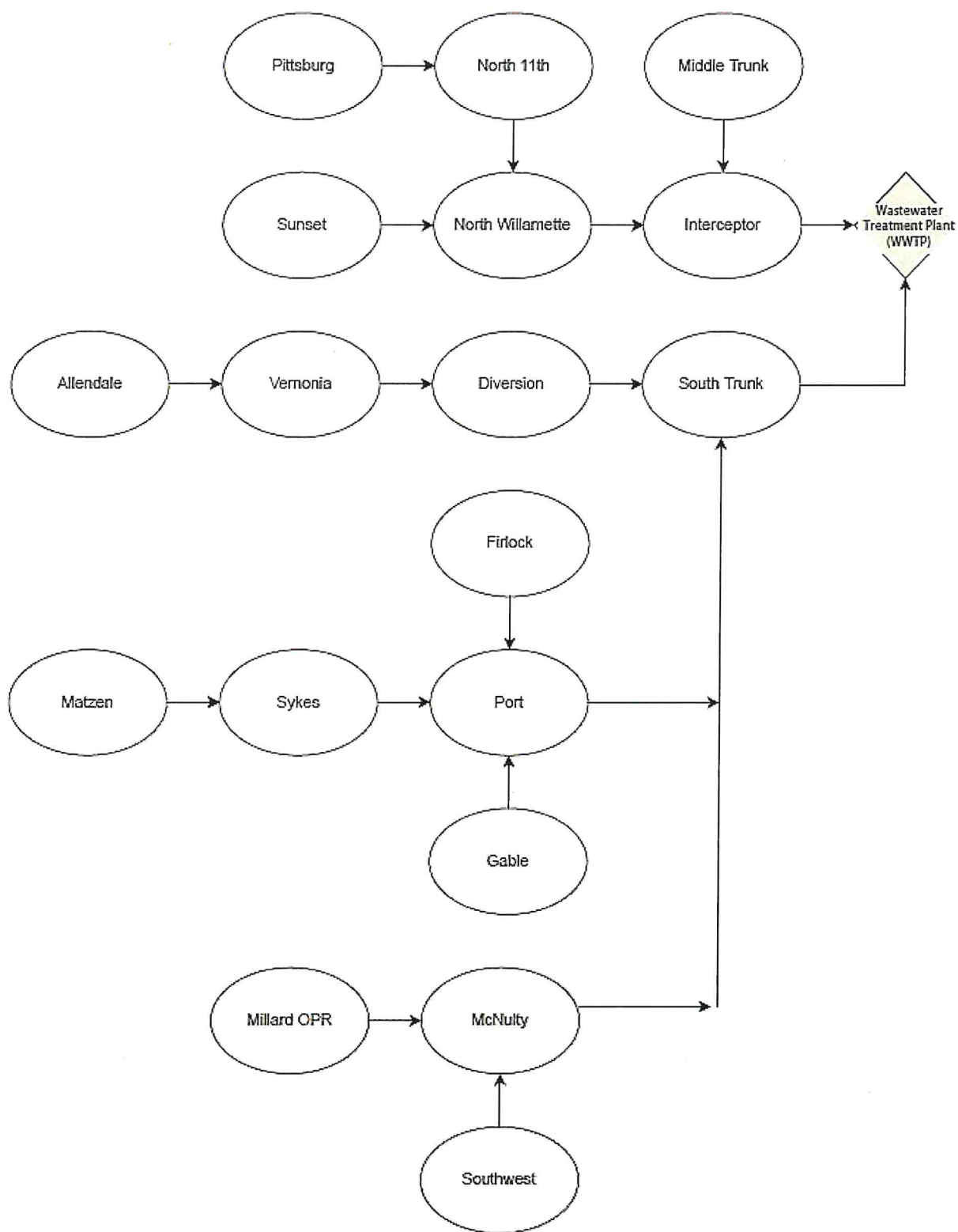


Figure 2.1.B St. Helens Sanitary Sewer Trunkline Basin Flow Paths

2.11 North 11th Sewer Basin

The North 11th sewer basin area has 304 new In-Basin EDUs.

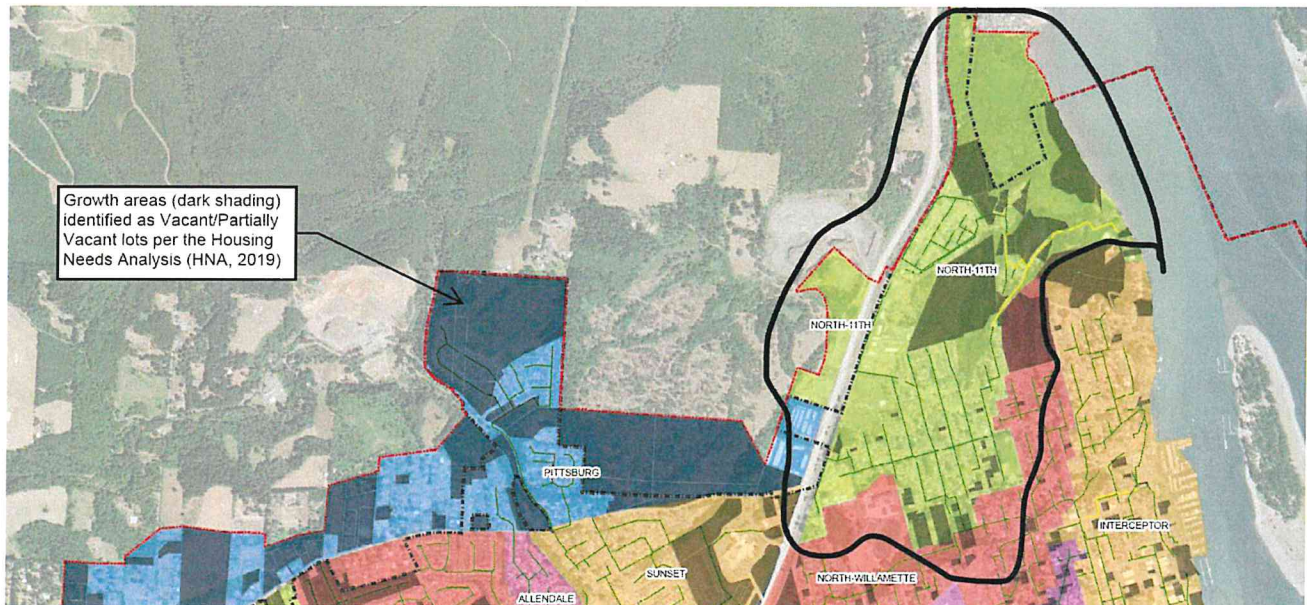


Figure 2.11.A North 11th Sanitary Sewer Basin

The allocation of the North 11th sewer basin's downstream CIP share per new upstream EDU, which consists of North 11th, North Willamette, and the Interceptor basins, is \$3,400.

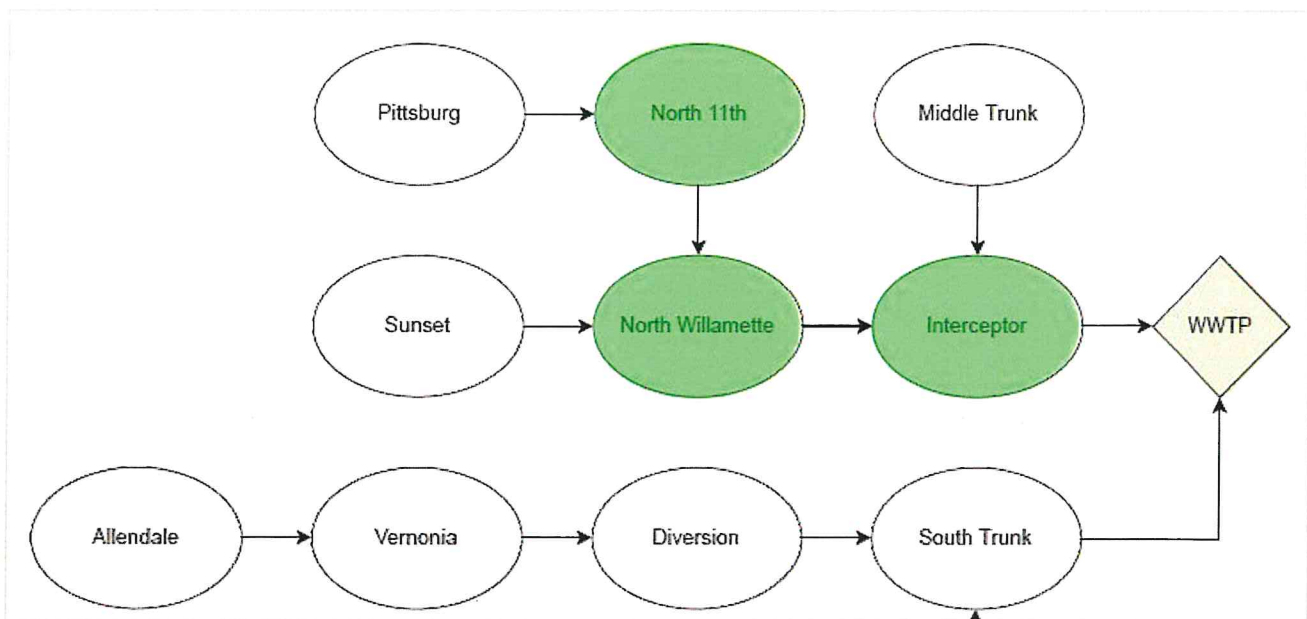


Figure 2.11.B North 11th Sewer Basin Flow Path to WWTP

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.

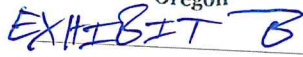
SECTION 4 – EQUIVALENT DWELLING UNIT CONVERSION

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



MEMORANDUM

The Engineering Division has the following conditions of approval regarding the N 8th St Planned Development,

-

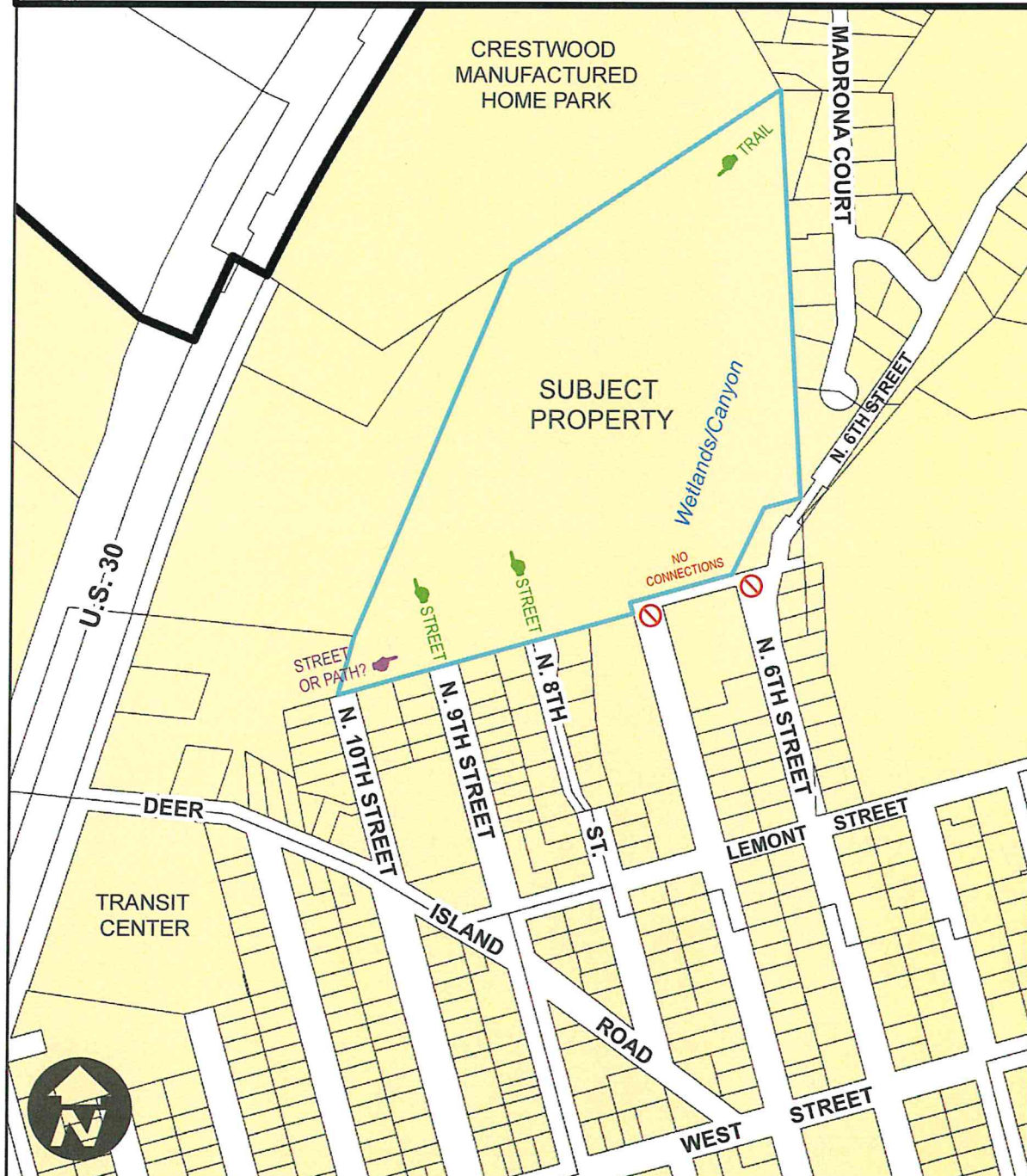
- Page | 1

4. Storm drain and storm structures that are proposed to be public shall be in the public right of way or within public easements of adequate width and in easily accessible locations for maintenance and repair.
5. The stormwater facilities shall remain under the ownership and management of the N 8th Street Subdivision's HOA. As a rule, the City does not accept facilities which are not designed for use by the general public as public infrastructure. Reference SHMC 17.152.100 (6) and 13.20.050 (4) regarding the City's acceptance of stormwater facilities.
6. Minimum cover of pipe shall be 18-inches for ductile iron pipe and 36-inches for non-reinforced pipe. In no case shall pipe cover be less than 18-inches. (Pipe cover less than 18-inches was seen throughout the prelim. plans)
7. A blow off shall be installed at the end of any water main that does not loop or reconnect to public system.
8. A 2-year maintenance/warranty period is required, not 1 year as the stormwater report states.
9. The Geotech report recommends that fill be compacted to 90% of the maximum dry density. Our standards require that a minimum of 95 percent of the maximum density be achieved for trench backfill and in the public right of way.

AREA CONNECTIVITY

As the Planning Commission considers the developed streets between the subject property and Deer Island Road, N.10th Street should not be overlooked. Also see Exhibit D.

Feb. 2022



SUB.1.22, et. al. - EXHIBIT D

GENERAL EXISTING CONDITIONS

N. 10th, 9th, and 8th STREETS

N. 10th, 9th and 8th Streets are all classified as local per St. Helens' Transportation Systems Plan. Standards for local streets include a roadway width of 34 feet (20 feet for two-way travel plus 7 foot on each side for on-street parking) with curb and 5 foot wide sidewalk on either side of the roadway.

The Commission needs to consider the deficiencies of N. 8th and especially N. 9th for vehicular and non-vehicular use as these streets are intended to be extended with increased use on these existing segments upon build out.

Since N. 10th abuts the property, it must also be considered for connectivity too.

SOURCE: City of St. Helens. Aerial photo from 2009.

Feb. 2022

