



CITY OF MILWAUKIE

AGENDA

October 10, 2023

PLANNING COMMISSION

milwaukieoregon.gov

Hybrid Meeting Format: The Planning Commission will hold this meeting both in person at City Hall and through Zoom video. The public is invited to watch the meeting in person at City Hall, online through the City of Milwaukie YouTube page (https://www.youtube.com/channel/UCRFbfaq3OnDWLQKSB_m9cAw), or on Comcast Channel 30 within city limits.

Please note: City Hall has moved to 10501 SE Main St. Planning Commission meetings are held in Council Chambers located on the 3rd floor.

If you wish to provide comments, the city encourages written comments via email at planning@milwaukieoregon.gov. Written comments should be submitted before the Planning Commission meeting begins to ensure that they can be provided to the Planning Commissioners ahead of time. To speak during the meeting, visit the meeting webpage (<https://www.milwaukieoregon.gov/planning/planning-commission-2>) and follow the Zoom webinar login instructions.

1.0 Call to Order – Procedural Matters — 6:30 PM

1.1 Native Lands Acknowledgment

2.0 Planning Commission Minutes

3.0 Information Items

4.0 **Audience Participation** — This is an opportunity for the public to comment on any item not on the agenda

5.0 Community Involvement Advisory Committee (CIAC)

6.0 Hearing Items

6.1 CSU-2023-004 – Milwaukie High School Parking Modification

Summary: Type III Community Service Use; Modification to Existing Approval

Staff: Senior Planner Brett Kelter

7.0 Planning Department/Planning Commission Other Business/Updates

8.0 Forecast for Future Meetings

October 24, 2023 No items at this time

November 14, 2023 Hearing Item: CSU-2023-005 – Major Modification for Sunshine Daycare
Work Session Item: Title 17 Land Division

Milwaukie Planning Commission Statement

The Planning Commission serves as an advisory body to, and a resource for, the City Council in land use matters. In this capacity, the mission of the Planning Commission is to articulate the Community's values and commitment to socially and environmentally responsible uses of its resources as reflected in the Comprehensive Plan.

1. **PROCEDURAL MATTERS.** If you wish to register to provide spoken comment at this meeting or for background information on agenda items please send an email to planning@milwaukieoregon.gov.
2. **PLANNING COMMISSION and CITY COUNCIL MINUTES.** City Council and Planning Commission minutes can be found on the City website at www.milwaukieoregon.gov/meetings.
3. **FORECAST FOR FUTURE MEETINGS.** These items are tentatively scheduled but may be rescheduled prior to the meeting date. Please contact staff with any questions you may have.
4. **TIME LIMIT POLICY.** The Commission intends to end each meeting by 10:00pm. The Planning Commission will pause discussion of agenda items at 9:45pm to discuss whether to continue an agenda item to a future date or finish the item.

Public Hearing Procedure

Those who wish to testify should attend the Zoom meeting posted on the city website, state their name and city of residence for the record, and remain available until the Chairperson has asked if there are any questions from the Commissioners. Speakers are asked to submit their contact information to staff via email so they may establish standing.

1. **STAFF REPORT.** Each hearing starts with a brief review of the staff report by staff. The report lists the criteria for the land use action being considered, as well as a recommended decision with reasons for that recommendation.
2. **CORRESPONDENCE.** Staff will report any verbal or written correspondence that has been received since the Commission was presented with its meeting packet.
3. **APPLICANT'S PRESENTATION.**
4. **PUBLIC TESTIMONY.** Comments or questions from interested persons and testimony from those in support or opposition of the application.
5. **QUESTIONS FROM COMMISSIONERS.** The commission will have the opportunity to ask for clarification from staff, the applicant, or those who have already testified.
6. **REBUTTAL TESTIMONY FROM APPLICANT.** After all public testimony, the commission will take rebuttal testimony from the applicant.
7. **CLOSING OF PUBLIC HEARING.** The Chairperson will close the public portion of the hearing. The Commission will then enter into deliberation. From this point in the hearing the Commission will not receive any additional testimony from the audience but may ask questions of anyone who has testified.
8. **COMMISSION DISCUSSION AND ACTION.** It is the Commission's intention to make a decision this evening on each issue on the agenda. Planning Commission decisions may be appealed to the City Council. If you wish to appeal a decision, please contact the Planning Department for information on the procedures and fees involved.
9. **MEETING CONTINUANCE.** Prior to the close of the first public hearing, any person may request an opportunity to present additional information at another time. If there is such a request, the Planning Commission will either continue the public hearing to a date certain or leave the record open for at least seven days for additional written evidence, argument, or testimony. The Planning Commission may ask the applicant to consider granting an extension of the 120-day time period for making a decision if a delay in making a decision could impact the ability of the City to take final action on the application, including resolution of all local appeals.

Meeting Accessibility Services and Americans with Disabilities Act (ADA) Notice

The city is committed to providing equal access to public meetings. To request listening and mobility assistance services contact the Office of the City Recorder at least 48 hours before the meeting by email at ocr@milwaukieoregon.gov or phone at 503-786-7502. To request Spanish language translation services email espanol@milwaukieoregon.gov at least 48 hours before the meeting. Staff will do their best to respond in a timely manner and to accommodate requests. Most Council meetings are broadcast live on the city's YouTube channel and Comcast Channel 30 in city limits.

Servicios de Accesibilidad para Reuniones y Aviso de la Ley de Estadounidenses con Discapacidades (ADA)

La ciudad se compromete a proporcionar igualdad de acceso para reuniones públicas. Para solicitar servicios de asistencia auditiva y de movilidad, favor de comunicarse a la Oficina del Registro de la Ciudad con un mínimo de 48 horas antes de la reunión por correo electrónico a ocr@milwaukieoregon.gov o llame al 503-786-7502. Para solicitar servicios de traducción al español, envíe un correo electrónico a espanol@milwaukieoregon.gov al menos 48 horas antes de la reunión. El personal hará todo lo posible para responder de manera oportuna y atender las solicitudes. La mayoría de las reuniones del Consejo de la Ciudad se transmiten en vivo en el canal de YouTube de la ciudad y el Canal 30 de Comcast dentro de los límites de la ciudad.

Milwaukie Planning Commission:

Jacob Sherman, Chair
Joshua Freeman, Vice Chair
Aaron Carpenter
Joseph Edge
Amy Erdt
Lauren Loosveldt
Will Mulhern

Planning Department Staff:

Laura Weigel, Planning Manager
Brett Kever, Senior Planner
Vera Koliass, Senior Planner
Adam Heroux, Associate Planner
Ryan Dyar, Assistant Planner
Petra Johnson, Administrative Specialist II



CITY OF MILWAUKIE

To: Planning Commission
Through: Laura Weigel, Planning Manager
From: Brett Kelter, Senior Planner
Date: October 3, 2023, for October 10, 2023, Public Hearing
Subject: **File:** CSU-2023-004
Applicant/Owner: North Clackamas School District
Address: 2301 SE Willard St
Legal Description (Map & Tax Lot): 1S1E36BC05600
NDA: Historic Milwaukie

ACTION REQUESTED

Approve application CSU-2023-004 and adopt the recommended Findings in support of approval found in Attachment 1. This action would modify the existing community service use approval for Milwaukie High School by eliminating the requirement for off-street parking.

BACKGROUND INFORMATION

A. Site and Vicinity

The site, which is located at 2301 SE Willard St, is the campus of Milwaukie High School and is approximately 14.7 acres. The site is developed with a main classroom building, commons building, and performing arts center on the southern half of the property, as well as a gymnasium, track and athletic field, and grandstand on the northern half. There are off-street parking lots in the northwest, southwest, and southeast corners of the site.

The site has frontage on multiple public streets— Adams Street, Lake Road, 21st Avenue, 23rd Avenue, 25th Avenue, Washington Street, and Willard Street. Access is provided from driveways on each of those streets except Adams Street and Lake Road.

As shown in Figure 1, the land uses and development adjacent to the site are mixed and include institutional and commercial uses (churches and retail or office buildings), multifamily residential dwellings (apartments and condominiums), and single-unit and

duplex residential dwellings. The surrounding properties range in size from average sized single-unit residential lots to larger multifamily properties and church sites.

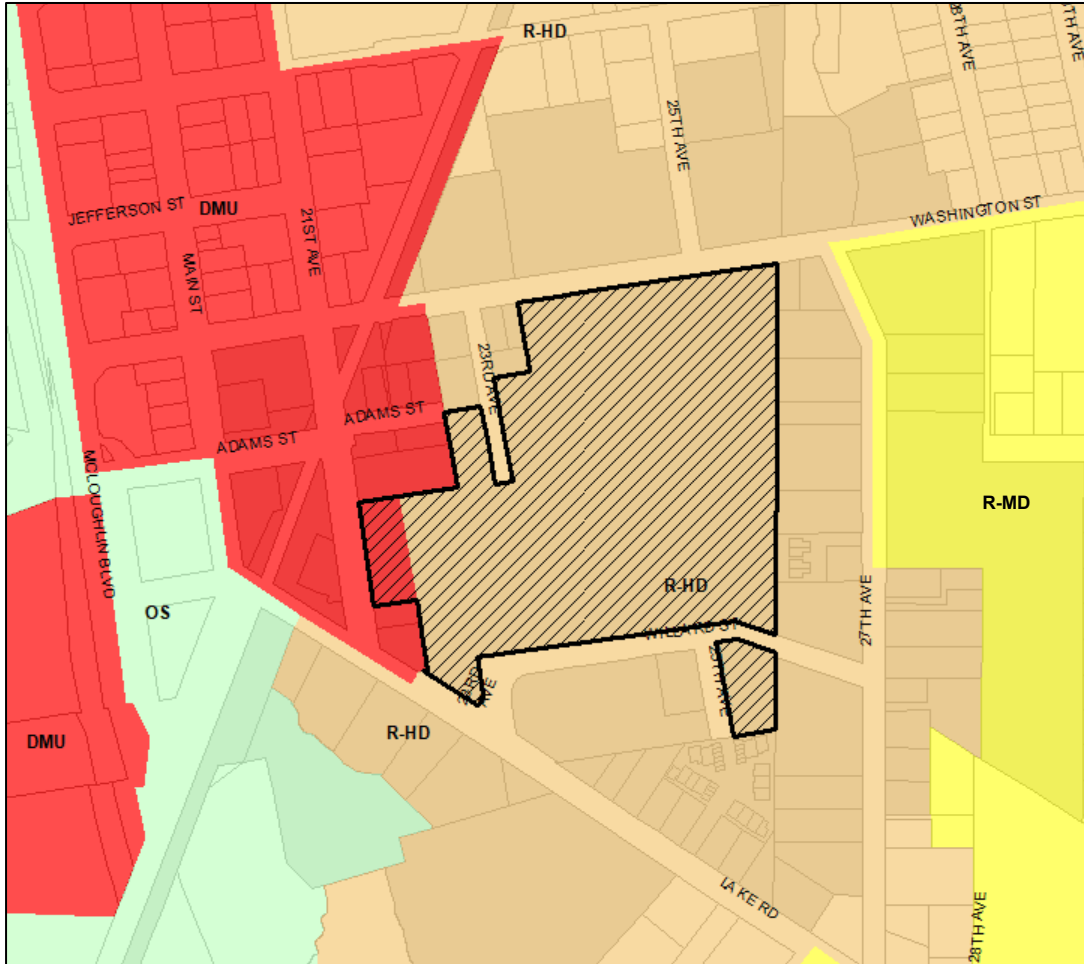
Figure 1. Aerial Photo



B. Zoning Designation

Most of the school property is zoned High Density Residential (R-HD), with the western portion of the fine arts building zoned Downtown Mixed Use (DMU). The R-HD zone allows higher density residential development that blends a range of housing types with a limited mix of neighborhood-scale commercial, office, and institutional uses. Schools are allowed in the R-HD zone subject to community service use (CSU) approval. To the north, south, and immediate east are properties also zoned R-HD, with properties to the west zoned DMU. Approximately one block to the east are properties zoned Moderate Density Residential (R-MD). The zoning in the vicinity of the school is shown in Figure 2.

Figure 2. Existing Zoning



C. Comprehensive Plan Designation

Public (P) (with the school parking lot at 25th Ave & Willard St designated Mixed-Use (C/HD))

D. Land Use History

- **Original development:** The main classroom building of Milwaukie High School was first constructed in 1925. A grandstand and athletic fields were added in 1938. The gymnasium was rebuilt after a fire destroyed the original in 1963. The fine arts building was built in 1970-71 when the high school itself was remodeled to meet current fire and safety codes.
- **1986:** Land use file #CSO-86-04, community service overlay approval for additional off-street parking.
- **1993:** CSO-93-02, approval to construct a new commons area.
- **1999:** CSO-99-05, approval to remodel the entire school.

- **2007:** CSU-07-05, approval to significantly upgrade the fine arts building, gymnasium, and athletic fields.
- **February 2018:** HR-2017-002, Historic Review approval to delete the Milwaukie High School site from the City's inventory of historic properties. This application was approved by the City Council on February 20, 2018 (Ord. 2159).
- **March 2018:** CSU-2017-007, approval of a major renovation of the school campus, including demolition and replacement of the main classroom building as well as replacement of the softball field (southeast part of campus) with off-street parking.
- **2019:** CSU-2019-002, approval to replace the pre-existing tennis courts in the southeast corner of the campus with off-street parking (constructed as part of the larger campus renovation).
- **March 2022:** CSU-2021-005, a Type III CSU sign application for an electronic reader board sign as newly allowed by ZA-2021-003.
- **May 2022:** CSU-2022-003, approval to modify two conditions of approval from CSU-2017-007 related to the vacation and/or dedication of public rights-of-way of Adams Street and 23rd Avenue on or near the high school campus.

E. Proposal

The applicant (North Clackamas School District) is proposing to modify the existing community service use (CSU) approval for Milwaukie High School to eliminate all past conditions of approval related to providing a minimum number of off-street parking spaces. Specifically, the District wishes to forego the renewal of shared parking agreements it has maintained for years with the St. John the Baptist Catholic Church (10955 SE 25th Ave) and St. Stephen Serbian Orthodox Church (11447 SE 27th Ave). The District has also proposed to eliminate the requirement to maintain an active transportation demand management program (TDMP).

A narrative description of the proposal is included in the applicant's submittal materials (see Attachment 2).

CONTEXT

The recent statewide rulemaking for Climate Friendly and Equitable Communities (CFEC) has been implemented through Oregon Administrative Rules (OAR) 660-012-0012 and 660-12-0440. The CFEC rules prohibit the City from enforcing minimum off-street vehicular parking requirements for development on sites within a half-mile of a frequent transit corridor or within three-quarters of a mile of a rail transit stop. For Milwaukie, which is reasonably well served by TriMet, the result is that the minimum parking quantities established in MMC Section 19.605 are no longer applicable for most of the city, including the Milwaukie High School site.

Historically, the high school has fallen short of meeting the minimum off-street parking requirements for high schools provided in MMC Table 19.605.1, which are based on the number

of students (0.25 spaces per student) and staff (1 space per staff). Over the past two decades, the school's capacity of 1,500 students and its staffing level ranging from around 100 to 140 has required a minimum of up to 515 parking spaces (before any allowed reductions). In 2007, the campus provided 198 on-site spaces, and the school used shared parking agreements with two nearby churches (103 spaces at St. John the Baptist Catholic Church on the north side of campus and 40 spaces at St. Stephan Serbian Orthodox Church on the south side)¹ to bring the site closer to conformance, but it still fell short by over 130 spaces. A condition of the school's CSU approval required it to retain no fewer than the number of off-street parking spaces it was providing at that time, whether on-site or shared.

Once the downtown light rail station was established in 2015, the minimum parking requirement was reduced by 25% (to 386 spaces at current staffing levels) as per MMC Subsection 19.605.3.B.2.c. Additional campus redevelopment projects from 2017-19 included the replacement of both the softball field and tennis courts with new surface parking lots, increasing the number of on-site parking spaces to 263. Adjustments to the previous church agreements reduced the shared parking number to 90, for a total of 353 off-street parking spaces—still more than 30 spaces short of the minimum number required by MMC Table 19.605.1.

It was not until school operations returned to normal following the pandemic that the most recent campus renovation was able to be more fully actualized, including the two new parking lots. The North Clackamas School District observed how the on-site parking was being utilized and conducted counts to collect data. They found that 80-90 of the on-site parking spaces (roughly one-third) were available at any given time, with none of the church-site shared spaces used by students or staff. The District decided it was worth exploring the possibility of not renewing the shared parking agreements, since they no longer appear to be necessary and represent an ongoing expense.

With the CFEC rules in effect, the question was whether any formal review was needed to make the proposed adjustment. The management of parking impacts is a condition of the school's ongoing CSU approval and, as a rule, conditions of approval can only be altered or eliminated by the Planning Commission through a Type III review process. Although the CFEC rules override the City's authority to require a minimum off-street parking quantity for the school, if the Commission were to find that there were parking-related impacts from the school's continued operation, they could impose any reasonable condition(s) besides requiring off-street parking to mitigate those impacts. For example, the Commission could consider a requirement for a residential on-street parking permit program to provide nearby residents with a mechanism for maintaining more predictable access to street parking near the campus.

Staff, in consultation with the City Attorney, determined that it would not be appropriate to simply point to CFEC and declare that any parking-related conditions of approval are now

¹ Shared parking agreements can be for unilateral or mutual use of parking by the involved parties. In this case, the District pays the churches for access to the parking spaces each church is willing to share—staff is not aware of either church regularly using any of the school's on-site parking in conjunction with their own activities.

void. Instead, a CSU review and public hearing are necessary to consider the District's formal request to eliminate the conditions of the CSU approval related to minimum off-street parking and the maintenance of an active TDMP.

KEY QUESTIONS

Analysis

Staff has identified the following key question(s) for the Planning Commission's deliberation. Aspects of the proposal not listed below are addressed in the Findings (see Attachment 1) and generally require less analysis and discretion by the Commission.

A. Are there any negative impacts from the proposal to retire the existing shared parking agreements?

As noted above, the high school campus currently provides over 280 on-site parking spaces. The District has reported that roughly one-third of those spaces (80-90) are available at any given point during the typical school day. By adding approximately 80 new on-site spaces since 2007, the school site appears to now have an abundance of off-street parking. The City has not received any complaints about school-related parking spilling over onto adjacent neighborhood streets for either normal school day use or for after-school athletic or other special events happening on campus.

The applicant has indicated that the school administration has been directing students not to use either of the shared church parking lots, since ample parking is available on campus. As noted above, even without the shared spaces, many on-site spaces remain available. Neither of the CSU approvals for the churches includes a condition requiring a shared parking agreement with the school, and neither church has contacted the City with concerns about the proposed cancellation of shared parking agreements. Staff imagines that the churches can negotiate their own new agreements with the District if they decide in the future that they need access to parking spaces on the school campus for their own activities.

Staff does not believe there are any negative impacts from the proposal to cancel shared parking agreements that require mitigation.

B. Should the requirement to maintain an active TDMP be kept in place?

The school's 2007 CSU approval included a condition requiring the development of a TDMP that would improve the functioning of the existing parking situation at the school and reduce demand for the limited number of off-street spaces. The TDMP was to include the formation of a transportation committee composed of students, faculty, and staff that would study parking demand and develop and promote alternative transportation options (including carpooling). A transportation resource center was also to be established on campus.

The 2007 condition for a TDMP was not fully implemented—at least, staff did not follow up regularly between 2007 and 2017 to verify that a transportation committee had been established and alternative modes were being promoted. There were no complaints received

regarding on-street parking conflicts in adjacent neighborhoods, and the parking arrangement appeared to function adequately during that decade. In retrospect, it seems fair to view the TDMP requirement as a sort of compromise for not forcing the site to come fully into compliance with the minimum required number of spaces (which would have been physically and financially infeasible) rather than as a response to an identified parking problem.

The proposed campus renovation in 2017 offered an opportunity to revisit the parking issue, and the TDMP requirement was retained as a condition, with an added emphasis on the promotion of carpooling. That focus was largely related to the applicant's request for a variance from the carpooling standard of MMC Section 19.610, which was not addressed directly in 2007. The applicant explained that informal carpooling was common among the student body and suggested that designated carpool parking spaces would be difficult to monitor and enforce and would not result in a notable increase in carpooling. Again, there were no public comments received that indicated there was a parking problem, but it seemed appropriate to address the school's nonconformance with the minimum requirements for both the parking quantity and carpooling standards by upholding the TDMP condition at that time.

The Planning Commission specifically required the applicant to return for review and approval of an updated TDMP within the first month of the new school year after construction began. In hindsight, it may have been more reasonable to ask for a revised TDMP within the first few months of the new school year after construction was completed instead, given the significant adjustments and disruptions involved with demolishing the main classroom building, temporarily relocating classrooms to the main athletic field, and having construction activity spread across the campus. Regardless, the COVID pandemic delayed the return to in-person classes, and staff did not immediately pursue the TDMP issue with school administrators.² When staff did raise the issue, the District indicated its interest in revising the CSU approval to eliminate both the parking quantity and TDMP requirements.

Since the TDMP does not itself require off-street parking (it is about managing parking demand), the CFEC rules do not prevent it from being a tool at the City's disposal. The Commission could require that the school continue to maintain and operate a TDMP to ensure that students and staff carpool or use alternative modes to get to and from the school in an effort to keep school-related parking from generating on-street parking conflicts with adjacent uses (primarily residential). However, staff has not received any indication that parking and transportation demand at the school needs special management. If the school provided no or considerably less on-site parking than it currently does, it would seem appropriate to use a TDMP to prevent or minimize conflicts. But given the existing

² It is also unclear what criteria the Planning Commission would have used for the conditioned "review and approval" of the updated TDMP. At the time, staff envisioned a Type III public hearing but without a new CSU land use application. The 2017 condition was not worded as clearly as necessary to be practical and legally defensible.

situation, staff does not believe it is necessary to require the District to invest the time and resources that would be involved with maintaining a TDMP.

CONCLUSIONS

Staff recommendation to the Planning Commission is as follows:

1. Approve the proposed modification to the Milwaukie High School CSU. This will remove the requirements to provide a minimum number of off-street parking spaces and maintain a TDMP.
2. Adopt the attached Findings in support of approval.

CODE AUTHORITY AND DECISION-MAKING PROCESS

The proposal is subject to the following provisions of the Milwaukie Municipal Code (MMC).

- MMC Chapter 19.600 Off-Street Parking and Loading
- MMC Section 19.904 Community Service Uses
- MMC Section 19.1006 Type III Review

This application is subject to Type III review, which requires the Planning Commission to consider whether the applicant has demonstrated compliance with the code sections shown above. In Type III reviews, the Commission assesses the application against review criteria and development standards and evaluates testimony and evidence received at the public hearing.

The Commission has four decision-making options as follows:

- A. Approve the application subject to the recommended Findings.
- B. Approve the application with modified Findings. Such modifications need to be read into the record.
- C. Deny the application upon finding that it does not meet approval criteria.
- D. Continue the hearing.

The final decision on this application, which includes any appeals to the City Council, must be made by December 23, 2023, in accordance with the Oregon Revised Statutes and the Milwaukie Zoning Ordinance. The applicant can waive the time period in which the application must be decided.

COMMENTS

Notice of the proposed changes was given to the following agencies and persons: City of Milwaukie Community Development, Engineering, Building, Public Works, Police, and Code Compliance departments; City Attorney; Clackamas Fire District #1 (CFD); Historic Milwaukie Neighborhood District Association (NDA) and Land Use Committee (LUC); and NW Natural. In addition, public notice was provided as required by MMC Subsection 19.1006.3 on September 20, 2023.

The following is a summary of the responses received by the City. See Attachment 3 for further details.

- **Ray Bryan, neighbor:** Agrees that there are plenty of off-street parking spaces during the average school day but has observed that peak parking demand is more often connected to evening and weekend events, both at the school and at the churches that share parking. Suggests that the school and nearby churches continue to share and organize off-street parking.

Staff response: As noted above in the discussion about the new CFEC rules, the City is no longer empowered to require off-street parking, whether on-site or shared. The school and churches are free to negotiate shared parking agreements if they choose, but shared parking can no longer be a condition of the CSU approval for the school (or for either of the churches).

ATTACHMENTS

Attachments are provided as indicated by the checked boxes. All material is available for viewing upon request.

	Public Copies	E-Packet
1. Findings in Support of Approval	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Applicant's Submittal Materials <i>(received August 4, 2023, unless otherwise noted)</i>		
a. Application Form	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
b. Narrative	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
c. Land Use Plans	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Public comments	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Key:

Public Copies = materials posted online to application website (<https://www.milwaukieoregon.gov/planning/csu-2023-004>)

E-Packet = meeting packet materials available one week before the meeting, posted online at <https://www.milwaukieoregon.gov/planning/planning-commission-93>

ATTACHMENT 1
Recommended Findings in Support of Approval
File #CSU-2023-004
Milwaukie High School Parking Requirements

Sections of the Milwaukie Municipal Code (MMC) not addressed in these findings are found to be inapplicable to the decision on this application.

1. The applicant, North Clackamas School District, represented by Cindy Detchon (Assistant Superintendent of Operations), has applied to modify the existing community service use (CSU) approval for Milwaukie High School as relates to off-street parking requirements. The subject property is located at 2301 SE Willard St and is primarily zoned High Density Residential (R-HD), with a small portion of the western side of the campus zoned Downtown Mixed Use (DMU). The land use application file number is CSU-2023-004.
2. The applicant is proposing to eliminate all past conditions of the Milwaukie High School CSU approval related to providing a minimum number of off-street parking spaces. Specifically, the applicant wishes to forego the renewal of shared parking agreements it has maintained for years with the St. John the Baptist Catholic Church (10955 SE 25th Ave) and St. Stephen Serbian Orthodox Church (11447 SE 27th Ave). The applicant has also proposed to eliminate the requirement to maintain an active transportation demand management program (TDMP).
3. The proposal is subject to the following provisions of the Milwaukie Municipal Code (MMC):
 - MMC Chapter 19.600 Off-Street Parking and Loading
 - MMC Section 19.904 Community Service Uses
 - MMC Section 19.1006 Type III Review

The application has been processed and public notice provided in accordance with MMC Section 19.1006 Type III Review. A public hearing was held by the Planning Commission on October 10, 2023, as required by law.

4. MMC Chapter 19.600 Off-Street Parking and Loading

MMC 19.600 regulates off-street parking and loading areas on private property outside the public right-of-way. The purpose of these requirements includes providing adequate space for off-street parking, minimizing parking impacts to adjacent properties, and minimizing environmental impacts of parking areas.

MMC Section 19.602 establishes the applicability of the provisions of MMC 19.600. Per Oregon Administrative Rules (OAR) 660-012-0012 and 660-12-0440, which relate to Climate-Friendly and Equitable Communities (CFEC) rulemaking, the City is prohibited from mandating minimum off-street vehicular parking quantity requirements on sites within a half-mile of a frequent transit corridor or within three-quarters of a mile of a rail transit stop. However, all other provisions of MMC 19.600 may still apply.

The subject property is located within a few blocks of the downtown station for TriMet's Orange MAX light rail line, so as per the CFEC rules the minimum off-street vehicle parking requirements of MMC Section 19.605 cannot be enforced. However, compliance with other applicable sections of MMC 19.600 is required.

The applicant has proposed to modify conditions of the school's existing CSU approval related to minimum parking quantity and the maintenance of an active TDMP. No physical changes to the existing physical parking situation are proposed. The CSU conditions in question are discussed in Finding 5.

The Planning Commission finds that the applicable standards of MMC 19.600 are met.

5. MMC Section 19.904 Community Service Uses

MMC 19.904 provides standards and procedures for review of applications for community service uses (CSUs). These are uses that are not specifically allowed outright in most zoning districts but that address a public necessity or otherwise provide some public benefit. CSUs include schools and accompanying sports facilities.

a. MMC Subsection 19.904.2 Applicability

MMC 19.904.2 establishes applicability of the CSU regulations, including a requirement for review to establish or modify a CSU.

The application is to modify the conditions of approval for an existing CSU.

The Planning Commission finds that the standards of MMC 19.904 are applicable to the proposed development.

b. MMC Subsection 19.904.3 Review Process

MMC 19.904.3 establishes the review process for CSUs. Except for wireless communication facilities and minor modifications to existing CSUs, applications for CSUs are subject to Type III review (MMC 19.1006).

The proposal is for modifying conditions of approval for an existing CSU and does not qualify as a minor modification as per MMC Subsection 19.904.5.C.

The Planning Commission finds that the proposed development is subject to the procedures for Type III review.

c. MMC Subsection 19.904.4 Approval Criteria

MMC 19.904.4 establishes the following approval criteria for CSUs:

- (1) The building setback, height limitation, and off-street parking and similar requirements governing the size and location of development in the underlying zone are met. Where a specific standard is not proposed for a CSU, the standards of the underlying zone must be met.

No physical changes are proposed to the site. As noted in Finding 2, the applicant is proposing to eliminate all past conditions of the existing CSU approval related to providing a minimum number of off-street parking spaces maintaining an active

TDMP. As discussed in Finding 4, the requirement for minimum off-street parking quantity is no longer enforceable. All other applicable standards continue to be met.

This criterion is met.

- (2) Specific standards for the proposed uses as found in MMC 19.904.7-11 are met.

The proposed modifications are subject to the standards provided in MMC Subsection 19.904.7 for schools, including the requirement to provide off-street parking as per MMC Chapter 19.600.

As noted in Finding 4, the state's CFEC rules prohibit the City from mandating minimum required off-street parking quantity requirements. While other standards of MMC 19.600 remain applicable, the applicant has not proposed changes to any other off-street parking standards.

This criterion is met.

- (3) MMC Subsection 19.904.4.C requires the hours and levels of operation of the proposed use to be reasonably compatible with surrounding uses.

No change to the existing approved hours and levels of operation are proposed.

This criterion is met.

- (4) MMC Subsection 19.904.4.D requires that the public benefits of the proposed use be greater than the negative impacts, if any, on the neighborhood.

In general, the community benefits from having its public high school near the downtown core and a variety of multimodal transportation options. The proposed modification relates to the school's provision of a minimum number of off-street parking spaces and its management of parking and transportation demand.

Under the now-inapplicable minimum parking ratios and with the allowed reduction for proximity to transit, the school's student capacity and current staffing level would require a minimum of 386 off-street parking spaces. The school campus currently provides over 280 on-site parking spaces. The applicant has reported that roughly one-third of those spaces (80-90) are available at any given point during the typical school day. The school site appears to now have an abundance of off-street parking.

The City has not received any complaints about school-related parking spilling over onto adjacent neighborhood streets for either normal school day use or for after-school athletic events or other special events happening on campus. Neither of the churches with whom the applicant has maintained shared parking agreements has contacted the City with concerns about the proposal not to renew them. There are no new impacts that would result from the proposed modification.

The Planning Commission finds that the public benefits of the existing school CSU continue to outweigh any negative impacts.

This criterion is met.

- (5) MMC Subsection 19.904.4.E requires the location to be appropriate for the type of use proposed.

The school is an approved CSU that provides a significant number of on-site parking spaces, roughly a third of which the applicant reports are regularly available during the typical school day. The subject property's proximity to a light rail station and several bus routes, as well as to bike lanes and a public sidewalk network, mean that it is well positioned for students, staff, and visitors to utilize any one of several alternative modes of travel. The proposed modifications are supportable in large part because of the school's location with respect to transportation infrastructure and options.

This criterion is met.

As proposed, the Planning Commission finds that the proposed new CSU meets the approval criteria of MMC 19.904.4.

The Planning Commission finds that the proposed development meets all applicable standards of MMC 19.904 to be approved as a new CSU. This standard is met.

6. The application was referred to the following departments and agencies on August 28, 2023:
- Milwaukie Community Development Department
 - Milwaukie Engineering Department
 - Milwaukie Building Department
 - Milwaukie Public Works Department
 - Milwaukie Police Department
 - Milwaukie Code Compliance
 - City Attorney
 - Historic Milwaukie Neighborhood District Association (NDA) Chairperson and Land Use Committee (LUC)
 - Clackamas Fire District #1 (CFD)
 - NW Natural

In addition, public notice was provided on September 20, 2023, as required by MMC Subsection 19.1006.3. The responses received are summarized as follows:

- **Ray Bryan, neighbor:** Agrees that there are plenty of off-street parking spaces during the average school day but has observed that peak parking demand is more often connected to evening and weekend events, both at the school and at the churches that share parking. Suggests that the school and nearby churches continue to share and organize off-street parking.



MILWAUKIE PLANNING
 6101 SE Johnson Creek Blvd
 Milwaukie OR 97206
 503-786-7630
 planning@milwaukieoregon.gov

Application for Land Use Action

Primary File #: CSU-2023-004

Review type*: I II III IV V

CHECK ALL APPLICATION TYPES THAT APPLY:

- | | | |
|--|---|--|
| <input type="checkbox"/> Amendment to Maps and/or
<input type="checkbox"/> Comprehensive Plan Map Amendment
<input type="checkbox"/> Zoning Text Amendment
<input type="checkbox"/> Zoning Map Amendment
<input type="checkbox"/> Code Interpretation
<input checked="" type="checkbox"/> Community Service Use
<input type="checkbox"/> Conditional Use
<input type="checkbox"/> Development Review
<input type="checkbox"/> Director Determination
<input type="checkbox"/> Downtown Design Review
<input type="checkbox"/> Extension to Expiring Approval
<input type="checkbox"/> Historic Resource:
<input type="checkbox"/> Alteration
<input type="checkbox"/> Demolition
<input type="checkbox"/> Status Designation
<input type="checkbox"/> Status Deletion | <input type="checkbox"/> Land Division:
<input type="checkbox"/> Final Plat
<input type="checkbox"/> Lot Consolidation
<input type="checkbox"/> Partition
<input type="checkbox"/> Property Line Adjustment
<input type="checkbox"/> Replat
<input type="checkbox"/> Subdivision
<input type="checkbox"/> Mixed Use Overlay Review
<input checked="" type="checkbox"/> Modification to Existing Approval
<input type="checkbox"/> Natural Resource Review**
<input type="checkbox"/> Nonconforming Use Alteration
<input type="checkbox"/> Parking:
<input type="checkbox"/> Quantity Determination
<input type="checkbox"/> Quantity Modification
<input type="checkbox"/> Shared Parking
<input type="checkbox"/> Structured Parking | <input type="checkbox"/> Planned Development
<input type="checkbox"/> Residential Dwelling
<input type="checkbox"/> Manufactured Dwelling Park
<input type="checkbox"/> Manufactured Dwelling
<input type="checkbox"/> Temporary Dwelling Unit
<input type="checkbox"/> Transportation Facilities Review**
<input type="checkbox"/> Variance:
<input type="checkbox"/> Use Exception
<input type="checkbox"/> Variance
<input type="checkbox"/> Willamette Greenway Review
<input type="checkbox"/> Other: _____
Use separate application forms for:
Annexation and/or Boundary Change <ul style="list-style-type: none"> • Compensation for Reduction in Property • Value (Measure 37) • Daily Display Sign • Appeal |
|--|---|--|

RESPONSIBLE PARTIES:

APPLICANT (owner or other eligible applicant—see reverse): North Clackamas School District - Cindy Detchon

Mailing address: 12400 SE Freeman Way State/Zip: OR / 97222

Phone(s): Contact Applicant's Representative Email: Contact Applicant's Representative

Please note: The information submitted in this application may be subject to public records law.

APPLICANT'S REPRESENTATIVE (if different than above): 3J Consulting, Inc.

Mailing address: 9600 SW Nimbus Ave. Suite 100 State/Zip: OR / 97008

Phone(s): (503) 946-9365 x251 Email: sam.huck@3j-consulting.com

SITE INFORMATION:

Address: 2301 SE Willard St. Milwaukie, OR 97222 Map & Tax Lot(s): 1S1E36BC Tax Lot 5600

Comprehensive Plan Designation: P, HD, TC Zoning: HDR / DMU Size of property: ± 14.7 acres

PROPOSAL (describe briefly):

Proposal to modify existing Milwaukie High School CSU to remove parking minimums or maximums, remove requirement that the District maintain shared parking agreements, and remove the requirement for a TDMP.

SIGNATURE: I attest that I am the property owner or I am eligible to initiate this application per Milwaukie Municipal Code Subsection 19.1001.6.A. If required, I have attached written authorization to submit this application. To the best of my knowledge, the information provided within this application package is complete and accurate.

Submitted by: C. Detchon

Date: 8/1/2023

IMPORTANT INFORMATION ON REVERSE SIDE

*For multiple applications, this is based on the highest required review type. See MMC Subsection 19.1001.6.B.1.

** Natural Resource and Transportation Review applications may require a refundable deposit.

WHO IS ELIGIBLE TO SUBMIT A LAND USE APPLICATION (excerpted from MMC Subsection 19.1001.6.A):

Type I, II, III, and IV applications may be initiated by the property owner or contract purchaser of the subject property, any person authorized in writing to represent the property owner or contract purchaser, and any agency that has statutory rights of eminent domain for projects they have the authority to construct.

Type V applications may be initiated by any individual.

PREAPPLICATION CONFERENCE:

A preapplication conference may be required or desirable prior to submitting this application. Please discuss with Planning staff.

DEPOSITS:

Deposits require completion of a Deposit Authorization Form, found at www.milwaukieoregon.gov/building/deposit-authorization-form

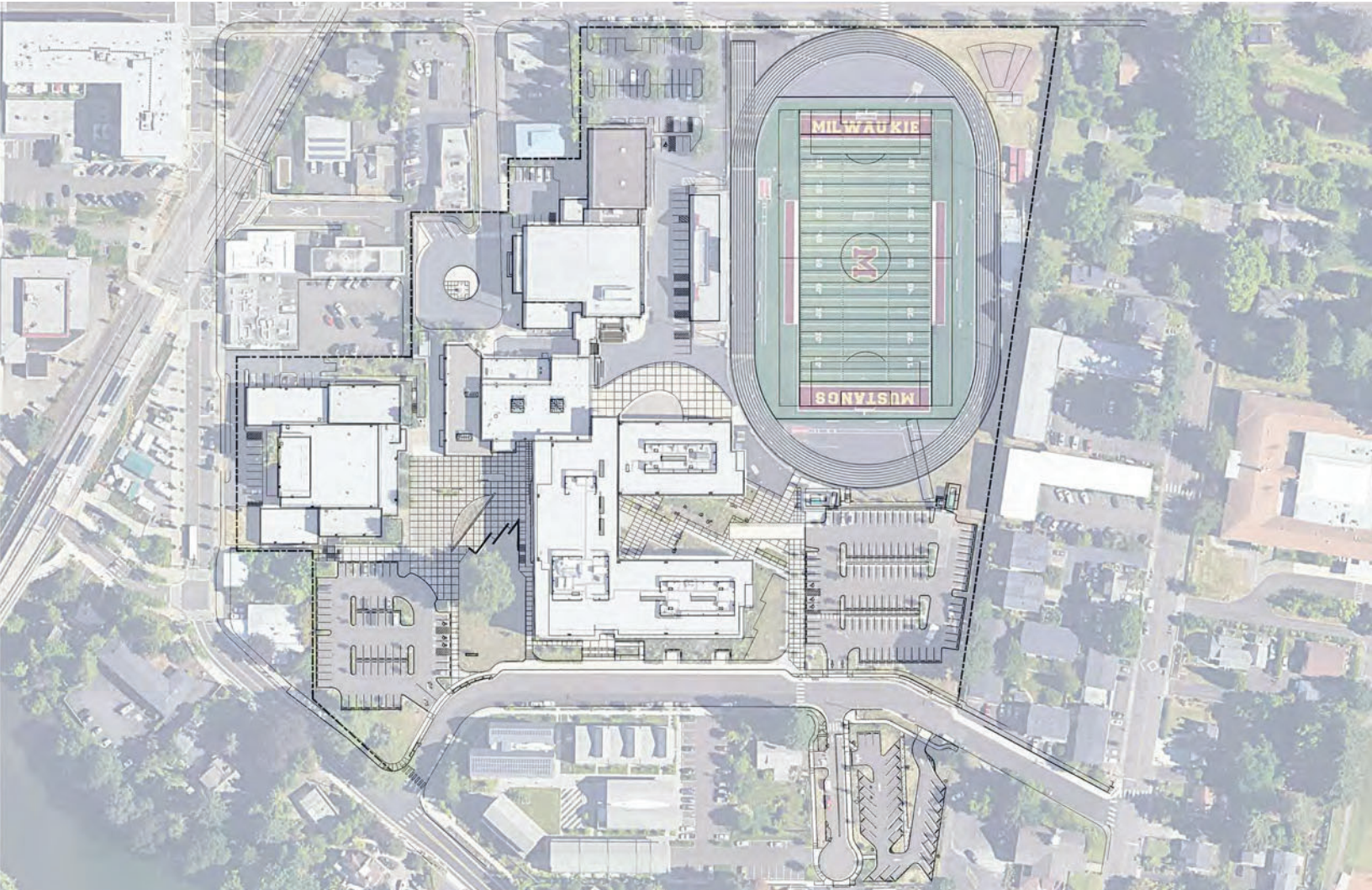
REVIEW TYPES:

This application will be processed per the assigned review type, as described in the following sections of the Milwaukie Municipal Code:

- Type I: Section 19.1004
- Type II: Section 19.1005
- Type III: Section 19.1006
- Type IV: Section 19.1007
- Type V: Section 19.1008

THIS SECTION FOR OFFICE USE ONLY:

FILE TYPE	FILE NUMBER	AMOUNT <small>(after discount, if any)</small>	PERCENT DISCOUNT	DISCOUNT TYPE	DATE STAMP
Primary file	CSU-2023-004	\$ 2,000			Materials submitted 8/04/2023 Payment received 8/08/2023
Concurrent application files		\$			
		\$			
		\$			
		\$			
Deposit (NR/TFR only)				<input type="checkbox"/> Deposit Authorization Form received	
TOTAL AMOUNT RECEIVED: \$ 2,000			RECEIPT #:	RCD BY:	
Associated application file #s (appeals, modifications, previous approvals, etc.):					
Neighborhood District Association(s):					
Notes:					



MILWAUKIE HIGH SCHOOL: CSU MODIFICATION

2301 SE WILLARD ST. MILWAUKIE, OR 97222

OWNER | APPLICANT:

NORTH CLACKAMAS SCHOOL DISTRICT
12400 SE FREEMAN WAY
MILWAUKIE, OR 97222
CONTACT: CINDY DETCHON
PHONE: (503) 353-6017

APPLICATION TYPE

TYPE III - CSU MAJOR MODIFICATION

APPLICANT'S REPRESENTATIVE

3J CONSULTING, INC.
9600 NW NIMBUS AVENUE, SUITE 100
BEAVERTON, OR 97008
CONTACT: SAM HUCK
PHONE: (503) 946-9365 x251

SUBMITTAL DATE

AUGUST 4, 2023

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Appendices

Appendix A – Land Use Application

Appendix B – Proof of Ownership

Appendix C – Land Use Plans

GENERAL INFORMATION

Property Owner and Applicant:	North Clackamas School District 12400 SE Freeman Way Milwaukie, OR 97222 Contact: Cindy Detchon Assistant Superintendent Phone: (503) 353-6017
Applicant's Representative:	3J Consulting, Inc. 9600 SW Nimbus Avenue, Suite 100 Beaverton, OR 97008 Contact: Sam Huck Phone: (503) 946-9365 x 251 Email: sam.huck@3j-consulting.com

SITE INFORMATION

Map Number and Parcel Number:	11E36BC, Tax Lot 5600
Address:	2301 SE Willard St. Milwaukie, OR 97222
Gross Site Area:	± 14.7 acres
Zoning Designation:	High Density Residential (R-HD) / Downtown Mixed Use (DMU)
Comprehensive Plan Designation:	Public (P)
Existing Use:	Community Service Use – Milwaukie High School
Surrounding Zoning:	The properties to the north and south are zoned R-HD. The properties to the east are zoned R-HD and R-MD past SE 27th Avenue. The properties to the west are zoned DMU.
Street Classification:	SE 27th Avenue is classified as a Neighborhood Route, SE Washington Street is classified as a Collector, and SE Willard Street is classified as Local in the Clackamas County Department of Transportation & Development Road Functional Classification.

INTRODUCTION

APPLICANT'S REQUEST

North Clackamas School District ("the District") proposes to change the total number of off-street parking spaces approved through previous land use decisions that are available to site users of Milwaukie High School ("MHS") and Milwaukie Academy of the Arts ("MAA") herein referred to as the "Campus" or "the site". The District is seeking approval of a Type III CSU Modification.

The District is requesting approval from the City of Milwaukie Planning Commission to remove conditions of approval from the existing CSU approvals that require the District to maintain a shared parking agreement at St. Stephen Serbian Orthodox Church ("St. Stephen's"), remove conditions of approval that require a shared parking agreement at St. John the Baptist Catholic Church ("St. John's"), remove conditions of approval of any other shared parking agreements for the purpose of meeting a specific threshold of parking spaces on the Campus, and to remove the conditions of approval that require the District to create, maintain, and enact a Transportation Demand Management Program ("TDMP").

This narrative has been prepared to describe the proposal and to document compliance with the relevant sections of the Zoning Ordinance of the City of Milwaukie, Oregon: Chapters 19.900, and 19.1000.

The Type III CSU Major Modification application is evaluated under the quasi-judicial decision process. The Planning Commission will render the decision after a public hearing is held.

SITE DESCRIPTION/SURROUNDING LAND USE

The Campus is located at 2301 SE Willard Street within the City of Milwaukie. The site consists of one tax lot, 1S1E36BC 5600, which is traversed by SE Willard Street. The site is approximately 14.7 acres and is primarily zoned R-HD, with a small portion of the site east of 21st Avenue zoned DMU. The existing school consists of a primary academic and administrative building, with several connecting additions made to the Campus over the years.

The surrounding zoning and development to the north and west of the site is mostly DMU and R-HD zoning and contains mostly commercial and retail use areas. The zoning adjacent to the site on the east is zoned R-HD. The neighborhood immediately adjacent to the High School is primarily residential, with some mix of uses.

PROPOSAL

The District is proposing to manage and mitigate impacts related to parking without being required by the City to maintain any shared parking agreements and without being required to develop, maintain, and enact a Transportation Demand Management Program (TDMP) or similar tools.

This Type III CSU Major Modification application seeks approval to remove any conditions of approval related to off-street parking requirements, which relate to and require the District to maintain shared parking agreements at St. Stephen's and St. John's churches as established by CSU-2017-007, and CSU-2019-002, and any other shared parking agreements as previously required. This Type III CSU Major Modification application also seeks to remove the Transportation Demand Management Program as previously required by the City of Milwaukie in the Notices of Decision for CSU-2007-005 and CSU-2017-007, and to remove any other conditions of approval from any previous land use decisions on the Campus for the existing use that require the District to maintain any shared parking agreements and adhere to any parking spaces minimum requirements for the subject site.

The existing CSU approvals officially recognize the number of parking spaces on-site as 263. The District has been maintaining shared parking agreements with the two nearby churches which brought the total official count of available parking spaces to 353 spaces (263 on-site and 90 off-site shared parking). The District has used the most recent as-built civil drawings from the recent Campus renovation, current aerial photographs, and current street view photographs, which indicate that the total number of on-site parking spaces is 282. This is demonstrated on the Site Plan submitted with this narrative in Appendix C.

Approval of this proposal for a Type III CSU Major Modification for the Campus would bring the total approved on-site parking spaces to 282, with 0 off-site parking spaces. The shared parking agreements with St. Stephen Serbian Orthodox Church and St. John the Baptist Catholic Church will not be renewed upon approval of this land use application, and the District would continue to appropriately mitigate the impacts related to parking without the requirement to meet on-site parking minimums, without any shared parking agreements, and without a Transportation Demand Management Program (TDMP) or similar tools.

VICINITY MAP



Figure 1 - Vicinity Map of the subject site.

APPLICABLE CRITERIA

The following sections of Zoning Ordinance of the City of Milwaukie, Oregon have been extracted as they have been deemed to be applicable to the proposal. Following each **bold** applicable criteria or standard, the District has provided a series of draft findings. The intent of providing code and detailed responses and findings is to document, with absolute certainty, that the proposed development has satisfied the approval criteria for a Type III CSU Major Modification application.

CHAPTER 19.900 LAND USE APPLICATIONS

19.904 COMMUNITY SERVICE USES

19.904.2 Applicability

Any community service use shall be subject to the provisions of this section. Application must be submitted to establish or modify a community service use. Community service uses include certain private and public utilities, institutions, and recreational facilities as listed below:

A. Institutions—Public/Private and Other Public Facilities

1. Schools, public or private, and their accompanying sports facilities, day-care centers, private kindergartens;
2. Government office buildings for local, state, or federal government such as a City Hall, courthouse, police station, or other similar buildings;
3. Hospital;
4. Cemetery;
5. Residential care facility;
6. Religious institutions;
7. Community meeting building;
8. Temporary or transitional facility;
9. Other similar uses as determined by the Planning Commission.

Finding: The CSU provisions are applicable as both MHS and MAA are Public Schools, which are listed as Institutions as defined in this code. This standard is met.

19.904.3 Review Process

Except as provided in Subsections 19.904.5.C for minor modifications and 19.904.11 for wireless communication facilities, community service uses shall be evaluated through a Type III review per Section 19.1006.

Finding: The District understands that the CSU Major Modification application will be evaluated through a Type III review per Section 19.1006. The review process and requirements are addressed further in this narrative.

19.904.4 Approval Criteria

An application for a community service use may be allowed if the following criteria are met:

A. The building setback, height limitation, and off-street parking and similar requirements governing the size and location of development in the underlying zone are met. Where a specific standard is not proposed in the CSU, the standards of the underlying zone are met;

Finding: Previous land use files #CSU-2017-007 and #CSU-2019-002 used Table 19.605.1 to determine the minimum and maximum requirements for the Campus. The minimum parking spaces required through Table 19.605.1 is 515 and the maximum is 635 spaces. With the proximity to the Orange Line Light-Rail station in downtown Milwaukie, the previous land use approvals established that the High School qualifies for a 25% reduction in the minimum parking requirement, reducing the minimum requirement in those approvals from 515 to 386 spaces.

Previously approved CSU Modification for the major renovation of the school in 2017 provided a total of 333 parking stalls available for use by the students and staff, of which, 243 spaces were provided on-site, and 90 spaces provided off-site through the use of shared parking agreements with St. John's and St. Stephen's.

Previously approved CSU Modification for the construction of a new parking lot on the old tennis courts in 2019 provided a net total additional 20 parking spaces to the Campus, bringing the total parking spaces on-site to 263 spaces. With the shared parking agreements at the neighboring St. John's and St. Stephen's still in place, an additional 90 off-site spaces have been available to the site users, bringing the total spaces to 353 spaces.

The most recent shared parking agreements between the District and both St. John's, and St. Stephen's was for a total of 96 off-site spaces available to site users, of which, 36 spaces are provided at St. Stephens, and 60 spaces provided at St. Johns. These most recent shared parking agreement leases were for a greater number of spaces than required by the existing CSU approvals.

A parking space count was conducted in July 2023 using the most recent Civil Record Set of plans (completed in May of 2021), and the most recently available aerial photographs and street view photographs to determine the current parking spaces that are available on the Campus. These counts indicate the total number of on-site parking spaces is 282. This parking count is demonstrated on the Site Plan and selected Civil Sheets from the May 2021 Record Set, along with screenshots of parking areas from street view, which are submitted with this narrative as Appendix C – Land Use Plans.

This application seeks approval of a CSU Major Modification for 282 parking spaces to be the total number of on-site, off-street parking spaces available to users of the site. This application also seeks approval of removing the existing TDMP as a requirement for the Campus, as the existing parking and current operations have met the needs of the site users, and have mitigated impacts to the community. No changes are proposed to any of the existing built conditions on the site.

The District finds that the State of Oregon has established Transportation Planning rules that the City of Milwaukie is subject to. The City has retained their land use regulations with parking mandates established, therefore the provisions of OAR 660-012-0425 through OAR 660-012-0450 establish the parking requirements for the City and this Type III CSU Major Modification application. The City has followed the requirements of the Department of Land Conservation and Development (DLCD) Parking Reform Summary, "Parking A",¹ by no longer enforcing parking requirements, except where sites are located farther than $\frac{3}{4}$ mile from rail or $\frac{1}{2}$ mile from frequent transit corridors.

OAR 660-012-0440: Parking Reform Near Transit Corridors, establishes that Cities that are within a metropolitan area and have not adopted land use regulations without parking mandates as provided in OAR 660-012-0420, may not require parking spaces for developments on a lot or parcel that includes lands within three-quarters mile of rail transit stops.

¹ (2022) Oregon Department of Land Conservation and Development: Parking Reform Summary
<https://www.oregon.gov/lcd/CL/Documents/ParkingReformOverview.pdf>

The general purpose of the State of Oregon's parking reforms is to reduce the number of parking spaces that are mandated by local jurisdictions. The DLCD Parking Reform Summary site describes minimum parking requirements as a "one-size-fits-all approach that ends up hiding the costs of parking in other goods, from housing to business costs to wages. That means the costs of car ownership and use are subsidized, leading people to own more cars and drive more than they would if they were aware of the true costs. Providing 300 square-feet of parking lot for each car that wants a parking spot is a significant cost...Because of the cookie-cutter approach of mandates, parking is often over-built, adding unnecessary costs, while pushing apart buildings and making areas less walkable. That means more driving, and more pollution"

The District finds that the 282 parking spaces on the Campus meet the needs of the site users, and that there are other opportunities besides driving and parking to the site that serve the site users. By approving this Type III CSU Major Modification application, the City of Milwaukie will be in-line with the intent of the new rules on Parking Reform.

Due to the proximity of the subject site to the TriMet MAX Orange Line Stop at Milwaukie/Main St, the District finds that the City may not have the ability to regulate the requirement to retain the established minimum parking spaces through previous CSU approvals.

This standard is met.

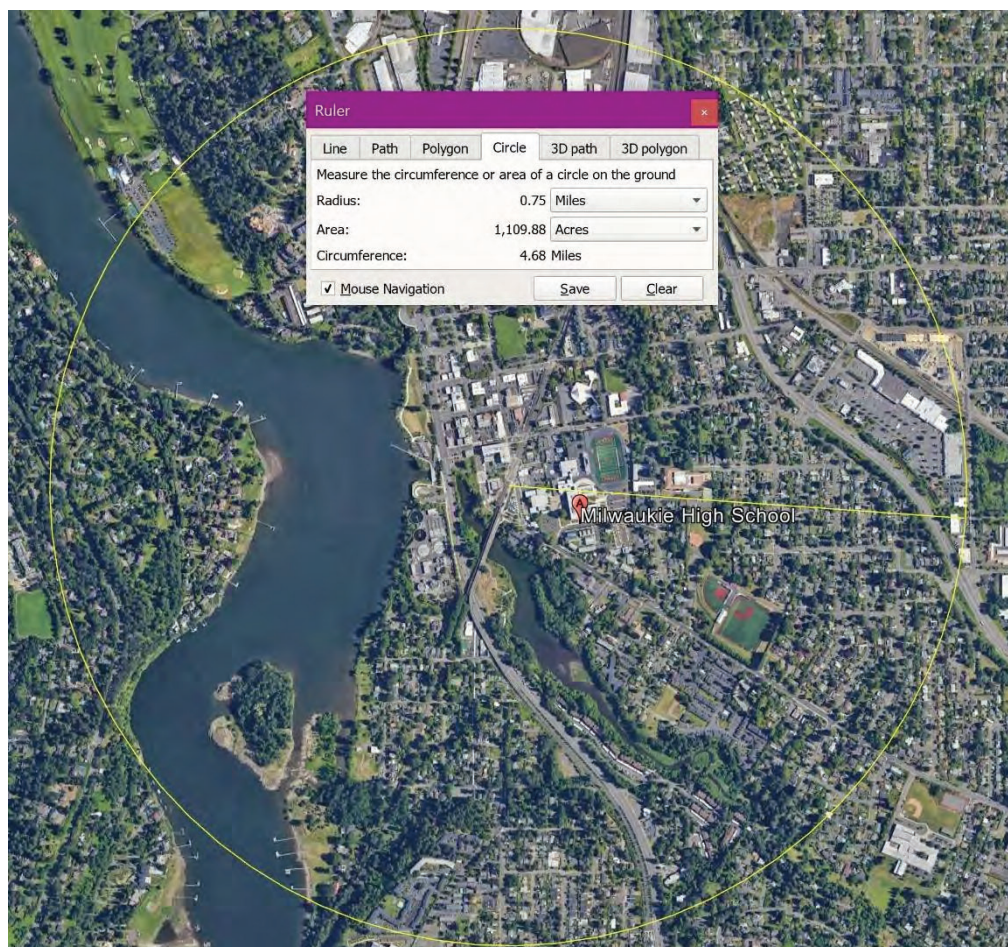


Figure 2 - Proximity of the site to MAX rail station

B. Specific standards for the proposed uses as found in Subsections 19.904.7-11 are met;

Finding: Specific standards for Schools 19.904.7 are addressed further in this narrative.

C. The hours and levels of operation of the proposed use are reasonably compatible with surrounding uses;

Finding: The District is not proposing to change any of the hours and levels of operations of the proposed use from the existing CSU approvals with this application.

D. The public benefits of the proposed use are greater than the negative impacts, if any, on the neighborhood; and

Finding: The overall site specific public benefits will not change, as the overall parking spaces on-site will not change. The public benefits will broadly affect the entire community which will be established by the District not having to spend money every year on shared parking lease agreements. The money that has been spent on shared parking agreement leases has not been the preferred use of funds by the District, and a public benefit would be the ability for the District to better use these funds to support positive student outcomes more directly.

The District finds that in the context of the new statewide regulations as discussed above, and the proximity of the High School to a rail station as demonstrated in Figure 2, that the parking minimums currently in place for the City of Milwaukie should not be the guiding principle for this decision.

The District has conducted counts of the available parking spaces on the site in order to demonstrate that the current amount of off-street parking spaces is adequate for the site users. These counts have been conducted at different times of the school year, and at different times during the day, when shared parking agreements were in place.

Table 1 – District Staff Parking Counts: on-site, off-site, and total vacant parking spaces

Date	Time	# of On-Site Parking Spaces Open	# of Off-Site Parking Spaces Open (Shared Parking Agreements at Churches)	Total # of Available Parking Spaces
11/21/2022	9:45 a.m.	78	96	174
01/12/2023	2:05 p.m.	85	96	181
01/18/2023	8:40 a.m.	91	96	187
03/08/2023	9:10 a.m.	82	96	178
04/27/2023	11:10 a.m.	89	96	185

These counts show that the off-site parking spaces provided through the shared parking agreements at St. Stephen’s and St. John’s are unnecessary for the daily operations of the High School. With the removal of the 96 shared parking spaces available to site users, the Districts finds that there will still be vacant parking spaces on-site and available to site users. The abundance of availability of on-site, off-street parking will mitigate any impacts to the surrounding areas, as the District is providing more than enough parking on site to meet the needs of the site users. On a given day during the academic school year, there are regularly at least 70 parking spots available to site users, as demonstrated in the above Parking Counts in Table 1.

The District also collects information on students who have District Transportation available to them through the school buses. This data is demonstrated below in Table 2.

Table 2 – Number of Students Using District Transportation

School	Students Within District Busing Boundary
Milwaukie High School	783 MHS students
Milwaukie Academy of the Arts	104 MAA students
Total	887 Total Students with Access to District Transportation

Out of the 822 students grade 9-12 at MHS, and 295 students at MAA, equaling a total of 1,117 student site users, 887 students have access to District provided transportation, which is over 79 percent of the student site users having access to District provided transportation. The District does not count the number of students who use the bus on a daily basis but represents that 887 students have assigned bus stops to their home address.

The District is aware that most of the families of MHS and MAA do not have the financial resources for their children to have cars, and that the majority of students who have a bus stop use the District provided transportation or public transportation. This is also a reason why the number of student parking permits is relatively low compared to the student population, as shown below in Table 3. The number of students (41) that are upper class students and have applied for and obtained parking permits for the on-site parking available, represent a small percentage of students (3.6% of 1117 students enrolled in 2023). The cost for a student parking permit is \$25 per semester. The District provides a total of 90 parking spaces designated for and available to students with permits, of which less than half are used, and the rest are open/vacant. The cost of a permit keeps students from parking on the Campus when they have a car available on sporadic days, keeping the use of the student parking areas consistent throughout the school year.

The most recent Enrollment Forecasts for the District show a decline in enrollment for the MHS Feeder System (elementary schools and middle schools that feed into MHS). The enrollment forecast was conducted by the Portland State University Population Research Center, and published in 2017.² The MHS Feeder System is forecasted to have a -5% change in enrollment for the 2026-2027 school year compared to the 2016-2017 enrollment numbers. The enrollment at MHS for the 2026-2027 school year when compared with the 2016-2017 enrollment numbers is forecasted to have a -18% change in students. The 2017 Population Research Center report supports this application proposal, and demonstrates that the number of students who obtain a parking permit is not likely to increase over the next several years, and may decrease with the forecasted decrease in enrollment. If a similar percentage of the student population at MHS request and obtain parking permits with the forecasted enrollment numbers, the District could expect approximately 34 students to request and obtain parking permits in 2026-2027. This would reduce the student parking need by seven parking

² (2017) North Clackamas School District Population and Enrollment Forecasts 2017-18 to 2026-27 <https://pdxscholar.library.pdx.edu/cgi/viewcontent.cgi?article=1104&context=enrollmentforecasts>

spaces, making those spaces open/vacant for that school year. The forecasted decrease in enrollment for MHS and the MHS Feeder System support this application proposal.

Staff are not assigned parking spaces and can park anywhere on-site outside of the student lots. In total, there are 107 staff which includes full-time, part-time, and custodial staff. If all of the staff (107) parked on-site at a single time, combined with the number of students who park on site with a parking permit (41), there would be 148 out of 282 parking spaces used, with 134 spaces open/vacant. This further supports that the District is properly mitigating the parking impacts needed on a daily basis by providing 282 spaces on-site. The number of open/vacant spaces that the District counted as outlined in Table 1, combined with the full possibility of all students and staff parking at the same time, demonstrate that there will be open spaces on-site during any given day, with some margin of error unaccounted for.

The margin of error in the amount of open spaces in Table 1 could be explained by District staff miscounting the open spaces, by not counting all the spaces available to all site users, by other community members in the surrounding area using the on-site parking spaces, by visitors and other school volunteers, or through a combination of these potential areas of error. The takeaway remains the same, that the Campus has enough on-site spaces to accommodate the site users.

Table 3 - Number of Students Using Other Transportation Available

Students Using Other Transportation Available	
Parking Permits	41 students issued parking permits per year
TriMet Bus Passes	13-18 students issued bus passes per week

Some of the site users choose to use, or are best served by public transit in the area, further reducing the need for the excess shared parking agreements at St. John’s and St. Stephen’s. The District represents that when students are experiencing temporary or long-term houselessness, they are provided district transportation or given free TriMet passes. Of the total student population, the District issues 13-18 TriMet Bus Passes per week.

In previous land use approvals, the District has been conditioned to create and maintain a Transportation Demand Management Program (TDMP). The district hired Lancaster Mobley in 2021 to create a TDMP for the Campus. The District represents that the added pressure of the District to participate in the list of suggested activities in the approved TDMP is not sustainable. The turnover of administration and office staff is high, and even if one person takes it on for a year, it is highly unlikely any of the programs will continue from year to year. This is the primary reason the 2021 TDMP has not been implemented, as District staff have not had the capacity to implement the recommendations. Without the use of the TDMP, the District has been mitigating any negative impacts to the community and the site has been working well, proving that the requirement for the TDMP is not necessary. Without the use of the TDMP, there are still open/vacant parking spaces on the Campus, indicating that it is not a necessary requirement. With this finding, the District represents that the removal of a TDMP as a condition of the existing CSU will not impact the neighborhood.

For peak events, the District has all of the parking on site available, is served by the excellent public transit options as discussed in further detail below, and has access to additional parking spaces at the Lake Road fields and Milwaukie El Puente Elementary School, both of which are owned and

operated by the District. Between these sites, the District is not aware of any parking issues during large events, with the biggest event being a Friday night football game or a weekend basketball tournament. This “overflow” parking that is available at the Lake Road fields and the Milwaukie El Puente Elementary School lots adds a total of at least 53 spaces at the Lake Road fields, and at least 56 spaces available at El Puente Elementary School, confirmed with recent aerial photography.

The District finds that the removal of the parking agreements at St. John’s and St. Stephen’s, any other existing shared parking agreements required, and the requirement to maintain a TDMP would have no net negative consequences to the site users and surrounding neighborhood. The District represents that the removal of the requirement for shared parking agreements offers a positive consequence for the entire community due to this being a cost-saving mechanism for the publicly funded School District.

As demonstrated in the findings herein, the District is properly mitigating the impacts to the community by providing 282 off-street, on-site parking spaces.

The District finds that because of the new rules on Parking Management established by the State of Oregon as discussed above, with the demonstrated on-site parking counts and other transportation options outlined in Tables 1, 2, and 3, and the locational characteristics of the site as discussed below, that the parking and transportation needs of the site are adequately met with the current use of the on-site parking. The District finds that the public benefits of the proposed modification of the CSU are greater than the negative impacts, if any, on the neighborhood.

This standard is met.

E. The location is appropriate for the type of use proposed.

Finding: The site has a variety of locational factors that make the 282 off-street on-site parking spaces an appropriate amount to mitigate any impacts. Because the use of the site is an existing High School the District provides school bus transportation to and from the school every single school day, which allows for a number of students to not use the existing 282 parking spaces provided on the Campus as demonstrated in Table 2 above.

Additionally, the site is located in a highly accessible part of Milwaukie through uniquely exceptional access to public transit options. The High school is surrounded by TriMet bus stops located at SE Washington St and 25th Ave., SE Washington St. and 23rd Ave., SE Washington and 21st Ave., SE 21st and SE Adams St. and SE Lake Rd. and 23rd Ave. These surrounding bus stops provide access for students and staff to the following bus lines: 29, 32, 33, 34, and 152. The 33 line is a frequent service bus line, which arrives every 15 minutes or less most of the day, every day of the week. The Campus is less than 1,000 feet to the Max Orange line Milwaukie/Main St. Station, which is located near the SE 21st Ave. and SE Adams St. intersection.

This exceptional access to transit in the area combined with the number of students who use District provided transportation, and the operational needs of the High School, combine to create special characteristics that make the 282 off-street, on-site parking spaces appropriate for the use. The location of the public transit in relation to the Campus is shown below in Figure 3.

The District finds that the location of the Campus is appropriate for the type of use proposed, and the location of the Campus is appropriate to approve this application. This standard is met.

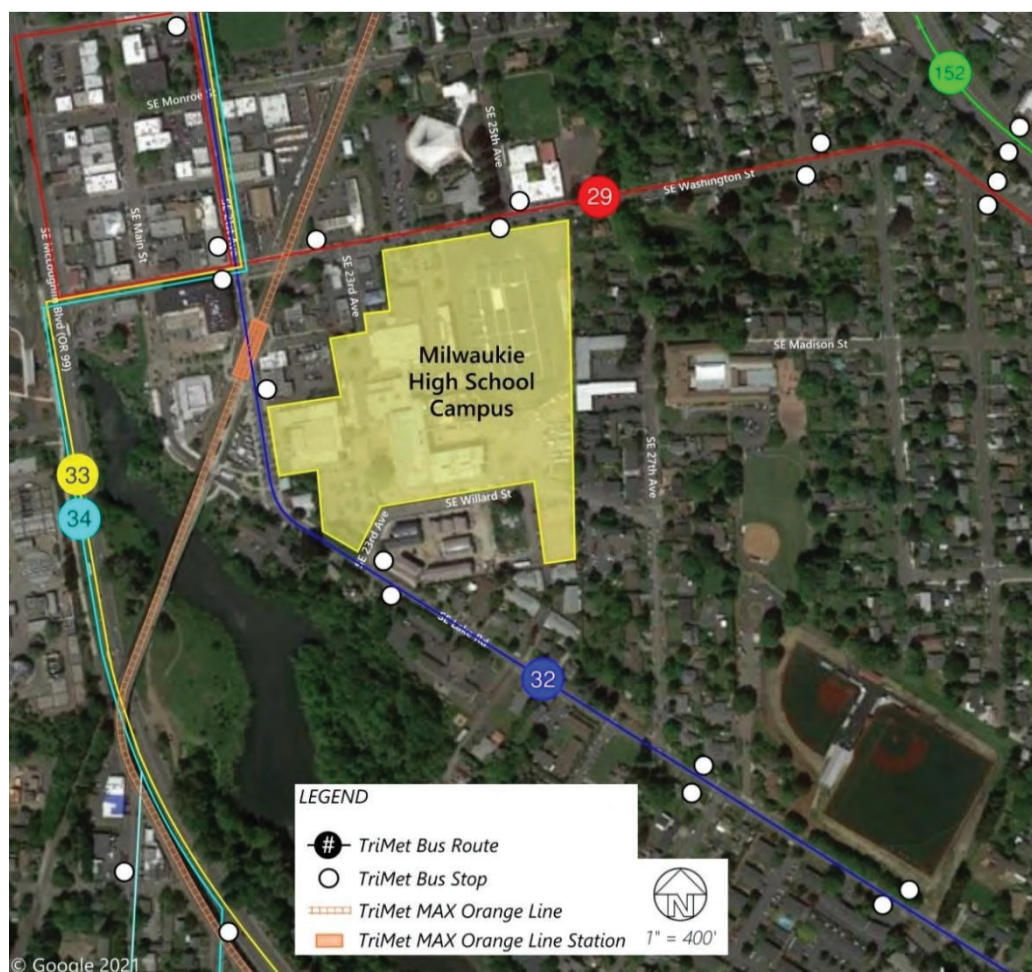


Figure 3 – Transit Facilities in proximity to the Campus.

19.904.5 Procedures for Reviewing a Community Service Use

A. The Planning Commission will hold a public hearing on the establishment of, or major modification of, the proposed community service use. If the Commission finds that the approval criteria in Subsection 19.904.4 are met, the Commission shall approve the designation of the site for community service use. If the Commission finds otherwise, the application shall be denied. An approval allows the use on the specific property for which the application was submitted, subject to any conditions the Planning Commission may attach.

Finding: The District understands that the application for a proposed Major Modification of the CSU will be evaluated through a Type III review per Section 19.1006 and that the Planning Commission will hold a public hearing on the application to find if the approval criteria of Subsection 19.904.4 are met.

B. In permitting a community service use or the modification of an existing one, the City may impose suitable conditions which assure compatibility of the use with other uses in the vicinity. These conditions may include but are not limited to:

1. Limiting the manner in which the use is conducted by restricting the time an activity may take place and by minimizing such environmental effects as noise and glare;
2. Establishing a special yard, setback, lot area, or other lot dimension;
3. Limiting the height, size, or location of a building or other structure;
4. Designating the size, number, location, and design of vehicle access points;
5. Increasing roadway widths, requiring street dedication, and/or requiring improvements within the street right-of-way including full street improvements;
6. Designating the size, location, screening, drainage, surfacing, or other improvement of a parking area or truck loading area; and/or
7. Limiting or otherwise designating the number, size, location, height, and lighting of signs.

Finding: The District understands that conditions may be imposed on the application for a modification of an existing CSU.

19.904.6 Application Requirements

An application for approval of a community service use shall include the following:

- A. Name, address and telephone number of applicant and/or property owner;**
- B. Map number and/or subdivision block and lot;**
- C. Narrative concerning the proposed request;**
- D. Copy of deed, or other document showing ownership or interest in property. If applicant is not the owner, the written authorization from the owner for the application shall be submitted;**
- E. Vicinity map;**
- F. Comprehensive plan and zoning designations;**
- G. A map showing existing uses, structures, easements, and public utilities and showing proposed development, placement of lot lines, etc.;**
- H. Detailed plans for the specific project;**
- I. Any information required by other applicable provisions of local, state or federal law;**
- J. Proof of payment of the applicable fees;**
- K. Additional drawings, surveys or other material necessary to understand the proposed use may be required.**

Finding: This application contains the following as required:

- A. Name, address and telephone number of District representative is included in this narrative on page 3,
- B. Map number included in this narrative on page 3,
- C. This narrative concerning the proposed request,
- D. Copy of deed of ownership attached to this narrative as Appendix B,
- E. A vicinity map included in this narrative on page 5,
- F. Comprehensive plan and zoning designations are included in this narrative on page 3,
- G. Land Use Plans with this information have been submitted with this application as Appendix C,
- H. Land Use Plans with this information have been submitted with this application as Appendix C,
- I. No other information is required by other application provisions of local state or federal law,
- J. Applicable fees have been submitted to the City upon submittal of this land use application,

- K. No other drawings, surveys, or other material is expected to be necessary to understand the proposed use, however the District will submit any additional material deemed necessary to complete this review.

The above requirements have been met.

19.904.7 Specific Standards for Schools

Public, private or parochial, elementary, secondary, preschool, nursery schools, kindergartens, and day-care centers are included.

A. Public elementary or secondary schools shall provide the site area/pupil ratio required by state law. Other schools shall provide 1 acre of site area for each 75 pupils of capacity or for each 2½ classrooms, whichever is greater, except as provided in Subsection 19.904.7.B below.

B. Preschools, nursery schools, day-care centers, or kindergartens shall provide a fenced, outdoor play area of at least 75 sq ft for each child of total capacity, or a greater amount if so required by state law. In facilities where groups of children are scheduled at different times for outdoor play, the total play area may be reduced proportionally based on the number of children playing out-of-doors at one time. However, the total play area may not be reduced by more than half. These uses must comply with the State Children's Services Division requirements as well as the City provisions.

C. Walkways, both on and off the site, shall be provided as necessary for safe pedestrian access to schools subject to the requirements and standards of Chapter 19.700.

D. Where Subsection 19.904.7.B is applicable, a sight-obscuring fence of 4 to 6 ft in height shall be provided to separate the play area from adjacent residential uses.

E. Public facilities must be adequate to serve the facility.

F. Safe loading and ingress and egress will be provided on and to the site.

G. Off-street parking (including buses) shall be provided as per Chapter 19.600.

H. Minimum setback requirements:

Front yard: 20 ft

Rear yard: 20 ft

Side yard: 20 ft

Setbacks may be increased depending on the type and size of school in order to ensure adequate buffering between uses and safety for students.

I. Bicycle facilities are required which adequately serve the facility.

J. 15% of the total site is to be landscaped.

Finding: The existing use of the site is not proposed to change from the existing Community Service Use for the students and staff of Milwaukie High School and Milwaukie Academy of the Arts. This application does not propose any changes to any buildings on the subject site, and does not propose any changes, increase, or decrease, to the site users which has been approved with a capacity of 1,500 students with a staff of up to 140 through existing CSU approvals.

Off-street parking requirements and the removal of the TDMP is the only proposed change with this application, which has been addressed above in this narrative.

The above standards are met.

CHAPTER 19.1000 REVIEW PROCEDURES

19.1006 TYPE III REVIEW

Type III applications are quasi-judicial in nature and are subject to approval criteria that require the exercise of discretion and judgment and about which there may be broad public interest. Impacts may be significant and development issues complex. Extensive conditions of approval may be imposed to mitigate impacts or ensure compliance with applicable approval criteria and development standards. The review process requires notice to nearby property owners and at least one public hearing before the Planning Commission.

When the Design and Landmarks Committee is required to conduct a design review meeting for applications in the downtown zones per Section 19.907, the design review meeting shall be in addition to the public hearing before the Planning Commission. The procedures for a design review meeting are contained in Section 19.1011.

19.1006.1 Preapplication Conference

A preapplication conference is required for Type III applications per Section 19.1002.

Finding: Staff from the City of Milwaukie Planning Department have indicated in writing to the District that a formal preapplication conference is not necessary for this land use application. A Preapplication Conference Waiver has been submitted with this application. This standard is met.

19.1006.2 Type III Application Requirements

A. Type III applications shall be made on forms provided by the Planning Director and shall include all of the information required by Subsection 19.1003.2.

B. Type III applications are subject to completeness review per Subsection 19.1003.3.

Finding: This Type III application for a CSU Major Modification has been made on the forms provided by the Planning Director, and includes all of the information required in Subsection 19.1003.2. The District understands and acknowledges the completeness review provisions of Subsection 19.1003.3. This standard is met.

19.1006.3 Type III Public Notice

...

C. Referral

Within 7 days after the application has been deemed complete, the City shall provide a copy of all application materials to the parties listed below for their review and comment. If no comments are received within 14 days from the date of the referral, the City will presume that no comments will be submitted.

- 1. Any City-recognized neighborhood district association whose boundaries include the subject property or are within 300 ft of the subject property.**

2. The Design and Landmarks Committee for applications in downtown zones or involving a designated historic resource.
3. Affected City departments and any governmental agency that is entitled to notice by the municipal code.

Finding: The District understands and acknowledges that the City will provide a referral copy to the above listed parties after the application has been deemed complete.

D. Mailed Notice

The purpose of the public notice is to provide nearby property owners and other interested parties with an opportunity to review the application, submit written comments, and participate in the proceedings concerning the Type III decision. The goal of this notice is to invite relevant parties of interest to participate in the process.

1. At least 20 days prior to the first public hearing on the application, except for continuations as noted in Subsection 19.1001.6.C.3, public notice of the application shall be mailed to the parties listed below. Notice requirements specific to Zoning Map amendments are listed in Subsection 19.1006.3.D.3.
 - a. The applicant and/or applicant's authorized representative.
 - b. The owner(s) of record of the subject property.
 - c. Owners of record of properties located within 300 ft of the perimeter of the subject property.
 - d. Neighborhood district associations to which the application was referred.
2. The public notice shall include the following information:
 - a. The case file number and a brief summary of the proposal.
 - b. A brief description of the subject property, including street address, if available, map and tax lot number, and zoning designation.
 - c. The date, time, and place of the hearing.
 - d. A statement that any member of the public may submit written comments prior to the hearing and may appear and provide written or oral testimony at the hearing.
 - e. A statement that only those who have submitted written comments prior to the hearing or participated at the hearing shall be entitled to appeal.
 - f. A general explanation of the requirements for submission of testimony and the procedure for conduct of public hearings.
 - g. A statement that a copy of the staff report will be available for review at no cost, and a copy will be provided at a reasonable cost, at least 7 days prior to the hearing.
 - h. The applicable approval criteria and/or development standards against which the proposal will be evaluated.
 - i. A statement that all application materials and applicable approval criteria and development standards are available for review at the City, and that copies can be obtained at a reasonable cost.
 - j. The name and phone number of the City representative to contact for additional information.
 - k. The following statement: "Notice to mortgagee, lien holder, vendor or seller: The Milwaukie Municipal Code requires that if you receive this notice it shall be promptly forwarded to the purchaser."

Finding: The District understands and acknowledges that the City will provide Mailed Notice in accordance with these standards.

E. Sign Notice

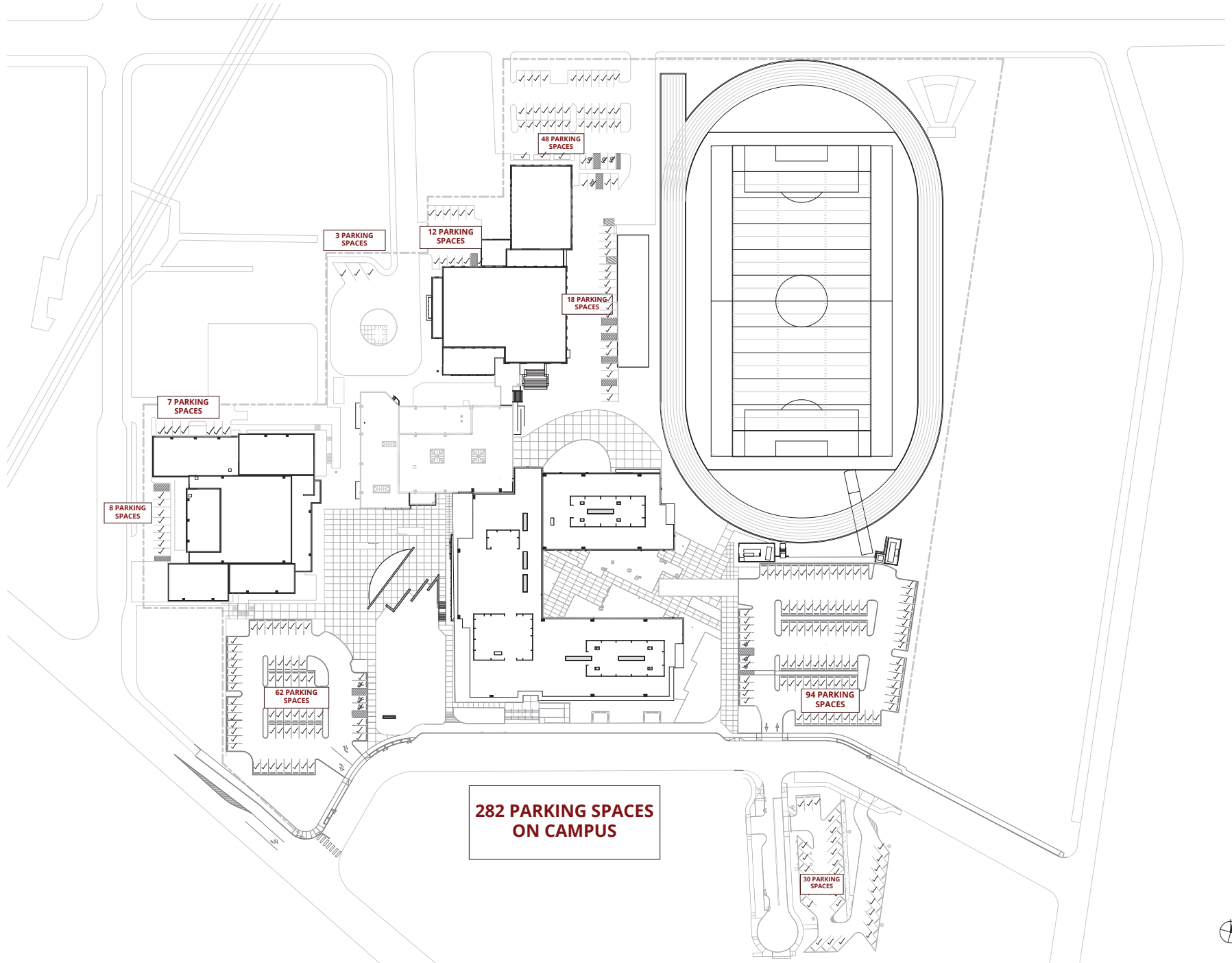
At least 14 days prior to the hearing, except for continuations as noted in Subsection 19.1001.6.C.3, notice of the application shall be posted on the subject property by the applicant and shall remain continuously posted until the hearing. Sign notice shall meet the requirements of Subsection 19.1001.6.C.1.b.

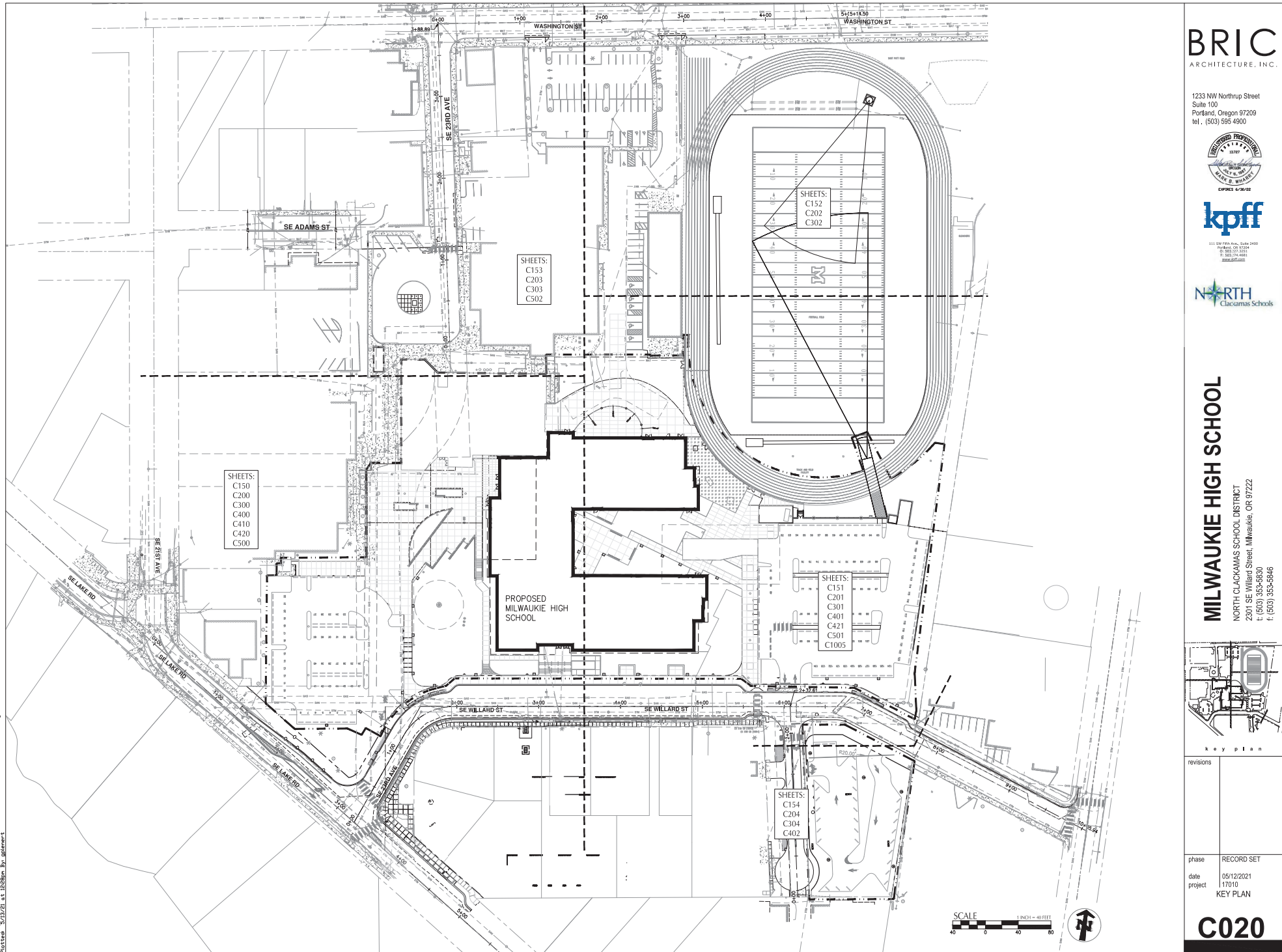
Finding: The District or their representative will post a Sign Notice on the subject site meeting the requirements of Subsection 19.1001.6.C.1.b. The District or their representative will post the required sign and submit an affidavit of posting prior to the issuance of the decision so that it is made part of the case file before the Planning Commission. This standard will be met.

SUMMARY AND CONCLUSION

The District finds that this narrative demonstrates that with new rules on Parking Management established by the State of Oregon; the demonstrated on-site parking counts and other transportation options available to site users; and the unique locational characteristics of the site, that the parking and transportation needs of the site are adequately met with the 282 on-site, off-street parking spaces without the use of a Transportation Demand Management Program. The District has demonstrated in this narrative that any negative impacts related to parking at the High School have been and will continue to be appropriately mitigated by the District.

Based upon the materials submitted herein, the District respectfully requests approval from the City of Milwaukie Planning Commission for this Type III CSU Major Modification application to remove any conditions of approval related to parking requirements, which relate to and require the District to maintain shared parking agreements at St. Stephen's and St. John's or any other shared parking agreements, to remove the Transportation Demand Management Program as a requirement, and to remove any other conditions of approval requiring the District to maintain any number of parking minimums.





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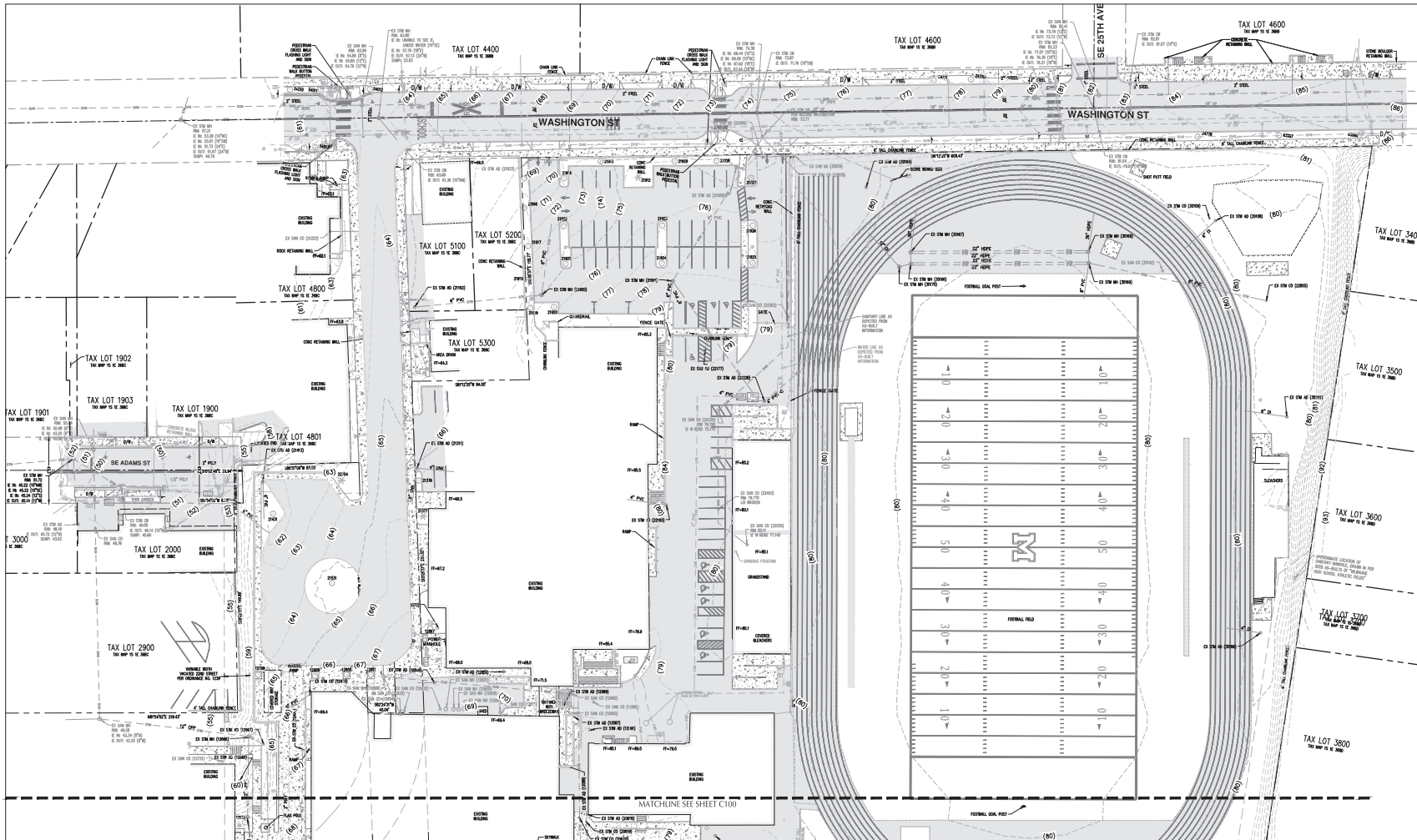


key plan

revisions	

phase	RECORD SET
date	05/12/2021
project	117010 KEY PLAN

C020



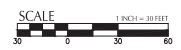
- NOTES:**
- UTILITIES SHOWN ARE BASED ON UNDERGROUND UTILITY LOCATE MARKINGS AS PROVIDED BY OTHERS, PROVIDED PER UTILITY LOCATE TICKET NUMBER 1700003, 1800000, 1800004, 1807004, AND 1807004. THE SURVEYOR MAKES NO GUARANTEE THAT THE UNDERGROUND LOCATES REPRESENT THE ONLY UTILITIES IN THE AREA. CONTRACTORS ARE RESPONSIBLE FOR VERIFYING ALL EXISTING CONDITIONS PRIOR TO BEGINNING CONSTRUCTION.
 - FIELD WORK WAS CONDUCTED MARCH 8-22, APRIL 10 & 14, AUGUST 14-18 2017, AND APRIL 9-12, APRIL 30-31 & MARCH 1, 2018.
 - VERTICAL DATUM: ELEVATIONS ARE HANDBOOK DERIVED FROM THE TRIMBLE VRS NOW NETWORK. NETWORK ELEVATIONS WERE CHECKED AGAINST PUBLISHED DATASHEET ELEVATIONS AT NCS BENCHMARK NO. RD1487, RD1488, AND RD1491.
 - THIS MAP DOES NOT CONSTITUTE A PROPERTY BOUNDARY SURVEY.
 - SURVEY IS ONLY VALID WITH SURVEYOR'S STAMP AND SIGNATURE.
 - BUILDING FOOTPRINTS ARE MEASURED TO SIDING UNLESS NOTED OTHERWISE. CONTACT SURVEYOR WITH QUESTIONS REGARDING BUILDING TIES.
 - CONTAINMENT INTERVAL IS 1 FOOT.
 - TREES WITH DIAMETER OF 4" AND GREATER ARE SHOWN. TREE DIAMETERS WERE MEASURED UTILIZING A DIAMETER TAPE AT BREAST HEIGHT. TREE INFORMATION IS SUBJECT TO CHANGE UPON ARBORIST INSPECTION.
 - HORIZONTAL DATUM: LOCAL DATUM PLANE SCALED FROM OREGON STATE PLANE NORTH 3001, NAD83(2011) EPOCH 2004.0000, BY HOLDING A PROJECT NEAR GROUND CORNERED SCALE FACTOR OF 1.0000000002 AT A CALCULATED CENTRAL PROJECT POINT WITH GRID VALUES OF (NORTH: 649604.00, EAST: 790488.50). THE MEAN CONVERGENCE ANGLE AT THE CALCULATED CENTRAL POINT IS -70"46". THE STATE PLANE COORDINATES WERE DERIVED FROM THE TRIMBLE VRS NOW NETWORK WITH HORIZONTAL POSITION CHECKED AGAINST PUBLISHED DATASHEET COORDINATES AT NCS CONTROL POINT PD 10494.
 - CITY OF MILWAUKIE ORDINANCE NUMBER 242, BOOK 497 PAGE 383 IS BLANKET IN NATURE AND COVERS 23RD STREET 500 FEET FROM WASHINGTON ST. AND WILLOW ST. FROM LAKE ROAD EASTWARD TO HENRIAN ROAD.
 - EXCESSIVE FOR EXISTING PUBLIC UTILITIES IN MARKED STREET AREAS AND THE CONDITIONS IMPROVED THEREBY, BOOK 181 PAGE 94 DOES NOT DESCRIBE ANY UTILITIES OR EASMENTS.

LEGEND

EXISTING	EXISTING	EXISTING	EXISTING	EXISTING
DECIDUOUS TREE	STORM SEWER CLEAN OUT	UTILITY WIRE ANCHOR	RIGHT-OF-WAY LINE	GRAVEL EDGE
CONIFEROUS TREE	STORM SEWER AREA DRAIN	POWER POLE	BOUNDARY LINE	POWER LINE
FIRE HYDRANT	STORM SEWER MANHOLE	POWER JUNCTION BOX	PROPERTY LINE	OVERHEAD WIRE
WATER METER	GAS METER	POWER INFESTAL	CENTERLINE	COMMUNICATIONS LINE
WATER VALVE	GAS VALVE	COMMUNICATIONS JUNCTION BOX	DITCH	FIBER OPTIC LINE
SON	SON	COMMUNICATIONS RISER	CURB	GAS LINE
SANITARY SEWER CLEAN OUT	SANITARY SEWER MANHOLE	MALBOX	EDGE OF PAVEMENT	STORM SEWER LINE
			EASEMENT	SANITARY SEWER LINE
			FENCE LINE	WATER LINE

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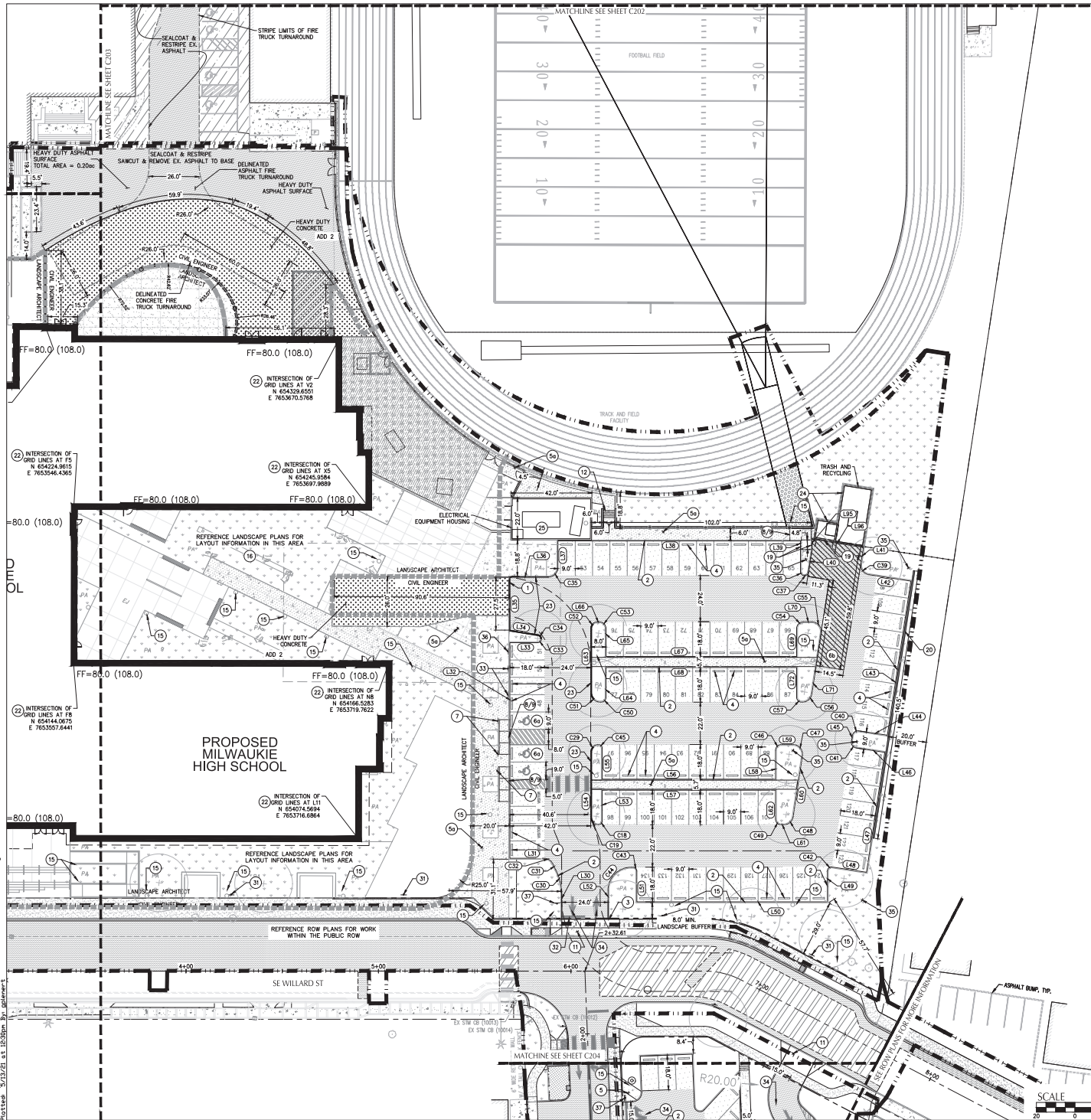
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revisions

phase RECORD SET
 date 05/12/2021
 project 117010
 EXISTING CONDITIONS

C101



SHEET NOTES

1. ALL DIMENSIONS ARE TO FACE OF CURB OR FACE OF WALL (UNLESS OTHERWISE NOTED).
2. SEE LANDSCAPE PLANS FOR PLANTING AND ADDITIONAL SITE FEATURES.
3. SEE LANDSCAPE PLANS FOR ALL PEDESTRIAN HARDSCAPE ON THE LANDSCAPE ARCHITECT SIDE OF THE REFERENCE LINE INCLUDING CONCRETE SCORING AND JOINT LOCATIONS.
4. SEE ARCHITECTURAL PLANS FOR ADDITIONAL DIMENSIONS AND LAYOUT.
5. SEE LANDSCAPE PLANS FOR ALL FENCING HANDRAILS AND GATES.
6. SEE SHEETS C700-C802 FOR PROPOSED FRONTAGE IMPROVEMENTS IN RIGHT-OF-WAY TO BE PERMITTED UNDER SEPARATE PERMIT.
7. SEE SHEET C205 FOR LINE AND CURVE DATA TABLES.

SHEET LEGEND

BUILDING OVERLAP
PROPERTY LINE

BUILDING

- HEAVY CONCRETE PAVING
- LIGHT ASPHALT PAVEMENT SECTION (FULL IN PARKING)
- HEAVY ASPHALT PAVEMENT SECTION (DRIVE AISLE)
- CONCRETE SIDEWALK
- PERVIOUS CONCRETE
- ARTIFICIAL TURF - SEE LANDSCAPE PLANS FOR DETAILS
- LANDSCAPE AREA - SEE LANDSCAPE PLANS FOR DETAILS
- 2" MILL & OVERLAY
- SEALCOAT AND RESTRIPE EX. ASPHALT
- TRACK SURFACE
- SAWCUT LINE
- LIMITS OF WORK - OFFSET FOR CLARITY
- FIRE LANE

SEE LIGHTING (SEE SHEET EPH1 FOR PHOTOMETRICS)

PROPOSED TREE

MATCHLINE

- RED PAINTED CURB
- POURIOUS ASPHALT PAVEMENT SECTION
- GUARD RAIL

KEY NOTES

#	DESCRIPTION	
1	MOUNTABLE CURB	7/0600
2	STANDARD CURB	6/0600
3	CURB CHONG TAPER TO FLUSH	6/0600
4	WHEEL STOP	5/0601
5	CONCRETE SIDEWALK	1/0600
5a	PERVIOUS CONCRETE SIDEWALK	SW110/0600
6a	ADA PARKING STALLS AND STRIPING	2/0601
6b	"NO PARKING" ZONE STRIPING	
6c	4' PARKING STRIPING, TYPICAL	
7	ADA PARKING SIGN & VAN	7/0601
8	DETECTABLE WARNING	3/0601
9	CURB RAMP	6/0601
10	CAST-IN-PLACE CONCRETE WALL	
11	CONCRETE DRIVEWAY APRON	5028/0802
12	CONCRETE STAIRWAY - SEE ARCHITECTURE PLANS.	
13	CURB SPILLWAY WITH SPLASH BLOCK	SW330/0600
14	ACCESSIBLE CROSSWALK	4/0601
15	SITE LIGHTING - SEE SHEET EPH1 FOR PHOTOMETRICS	
16	SEE LANDSCAPE PLANS FOR PLAZA DETAIL	
17	RETAINING WALL	
18	SEE LANDSCAPE PLANS FOR WALL LAYOUT.	
19	FLUSH CURB	9/0600
20	HEIGHTENED CURB (MAX 18")	
21	ELECTRICAL SLAB & STRUCTURE SEE ARCH. SHEETS	
22	BUILDING GRID COORDINATES SHOWN ARE PRELIMINARY. COORDINATE BUILDING GRID LOCATION WITH ARCHITECTURAL PLANS PRIOR TO CONSTRUCTION	
23	FIRE LANE PAINTED CURB WITH "FIRE-LANE-NO PARKING" STENCILS AT 20' INTERVALS	
24	TRASH ENCLOSURE - SEE ARCHITECTURAL SHEETS	
25	ELECTRICAL HOUSING - SEE ELECTRICAL DRAWINGS	
30	PARENT STOP SIGN	14/0601
31	BUS STOP SIGN	10/0601
32	PROVIDE STOP BAR	
33	CARPOOL PARKING SIGN	11/0601
34	PROVIDE DIRECTIONAL ARROWS	1/0601
35	SEE LANDSCAPE PLANS FOR PLANTING INFORMATION	
36	GREEN VEHICLE PARKING SIGN	12/0601
37	STOP SIGN	6/0601
38	DO NOT ENTER SIGN	13/0601
39	ELECTRICAL VEHICLE PARKING STALL	
40	FLUSH CONCRETE CROSSING/DRIVEWAY APRON	5020/0800

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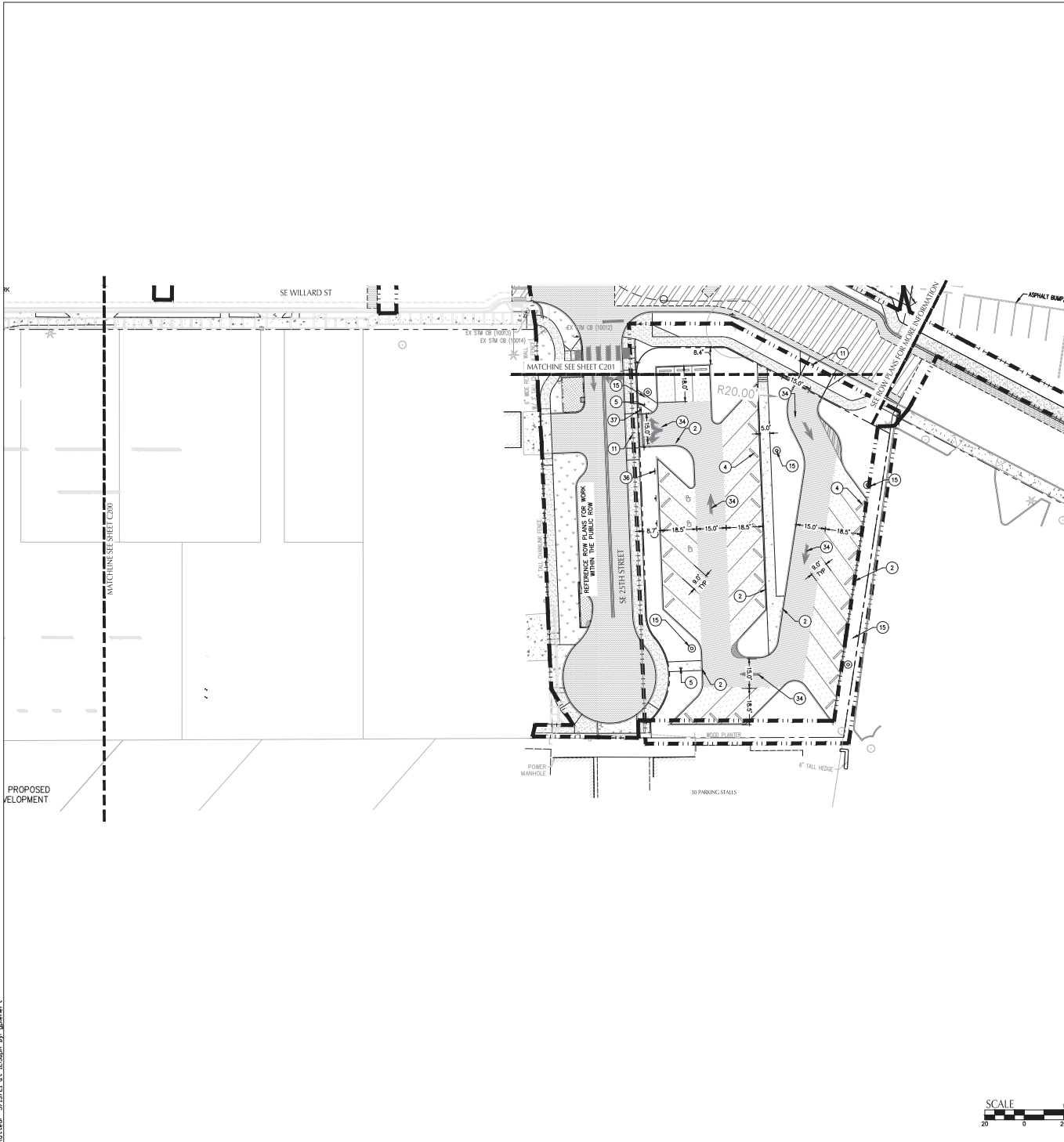


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revisions

phase	RECORD SET
date	05/12/2021
project	117010
SITE AND HORIZONTAL CONTROL PLANS	
C201	



SHEET NOTES

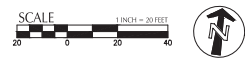
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5. SEE LANDSCAPE PLANS FOR ALL FENCING HANDRAILS AND GATES.
6. SEE SHEETS C700-C800 FOR PROPOSED FRONTAGE IMPROVEMENTS IN RIGHT-OF-WAY TO BE PERMITTED UNDER SEPARATE PERMIT.
7. SEE SHEET C205 FOR LINE AND CURVE DATA TABLES.

SHEET LEGEND

- BUILDING OVERHANG
- PROPERTY LINE
- BUILDING
- HEAVY CONCRETE PAVING
- LIGHT ASPHALT PAVEMENT SECTION (PULL IN PARKING)
- HEAVY ASPHALT PAVEMENT SECTION (DRIVE AISLE)
- CONCRETE SIDEWALK
- PERVIOUS CONCRETE
- ARTIFICIAL TURF - SEE LANDSCAPE PLANS FOR DETAILS
- LANDSCAPE AREA - SEE LANDSCAPE PLANS FOR DETAILS
- 2" MILL & OVERLAY
- SEALCOAT AND RESTRIPE EX. ASPHALT
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- LIMITS OF WORK - OFFSET FOR CLARITY
- FIRE LANE
- SITE LIGHTING (SEE SHEET EPH1 FOR PHOTOMETRICS)
- PROPOSED TREE
- MATCHLINE
- RED PAINTED CURB
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- GUARD RAIL

KEY NOTES

#	DESCRIPTION	
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2	STANDARD CURB	6/C600
3	CURB ENDING TAPER TO FLUSH	8/C600
4	WHEEL STOP	5/C601
5	CONCRETE SIDEWALK	1/C600
5a	PERVIOUS CONCRETE SIDEWALK	5W110/C600
6a	ADA PARKING STALLS AND STRIPING	2/C601
6b	"NO PARKING" ZONE STRIPING	
6c	4' PARKING STRIPING, TYPICAL	
7	ADA PARKING SIGN & VAN	7/C601
8	DETECTABLE WARNING	3/C601
9	CURB RAMP	8/C601
10	CAST-IN-PLACE CONCRETE WALL	
11	CONCRETE DRIVEWAY APRON	502B/C802
12	CONCRETE STAIRWAY - SEE ARCHITECTURE PLANS.	
13	CURB SPILLWAY WITH SPLASH BLOCK	5W130/C600
14	ACCESSIBLE CROSSWALK	4/C601
15	SITE LIGHTING - SEE SHEET EPH1 FOR PHOTOMETRICS	
16	SEE LANDSCAPE PLANS FOR PLAZA DETAIL INFORMATION.	
17	RETAINING WALL	
18	SEE LANDSCAPE PLANS FOR WALL LAYOUT.	
19	FLUSH CURB	9/C600
20	HEIGHTENED CURB (MAX 18")	
21	ELECTRICAL SLAB & STRUCTURE SEE ARCH. SHEETS	
22	BUILDING GRID COORDINATES SHOWN ARE PRELIMINARY. COORDINATE BUILDING GRID LOCATION WITH ARCHITECTURAL PLANS PRIOR TO CONSTRUCTION.	
23	FIRE LINE PAINTED CURB WITH "FIRE-LINE-NO PARKING" STENCILS AT 20' INTERVALS	
24	TRASH ENCLOSURE-SEE ARCHITECTURE SHEETS	
25	ELECTRICAL HOUSING-SEE ELECTRICAL DRAWINGS	
30	PARENT DROP OFF SIGN	14/C601
31	BUS LOADING SIGN	10/C601
32	PROVIDE STOP BAR	
33	CARPOOL PARKING SIGN	11/C601
34	PROVIDE DIRECTIONAL ARROWS	1/C601
35	SEE LANDSCAPE PLANS FOR PLANTING INFORMATION	
36	GREEN VEHICLE PARKING SIGN	12/C601
37	STOP SIGN	6/C601
38	DO NOT ENTER SIGN	13/C601
39	ELECTRICAL VEHICLE PARKING STALL	
40	FLUSH CONCRETE CROSSING/DRIVEWAY APRON	502C/C800



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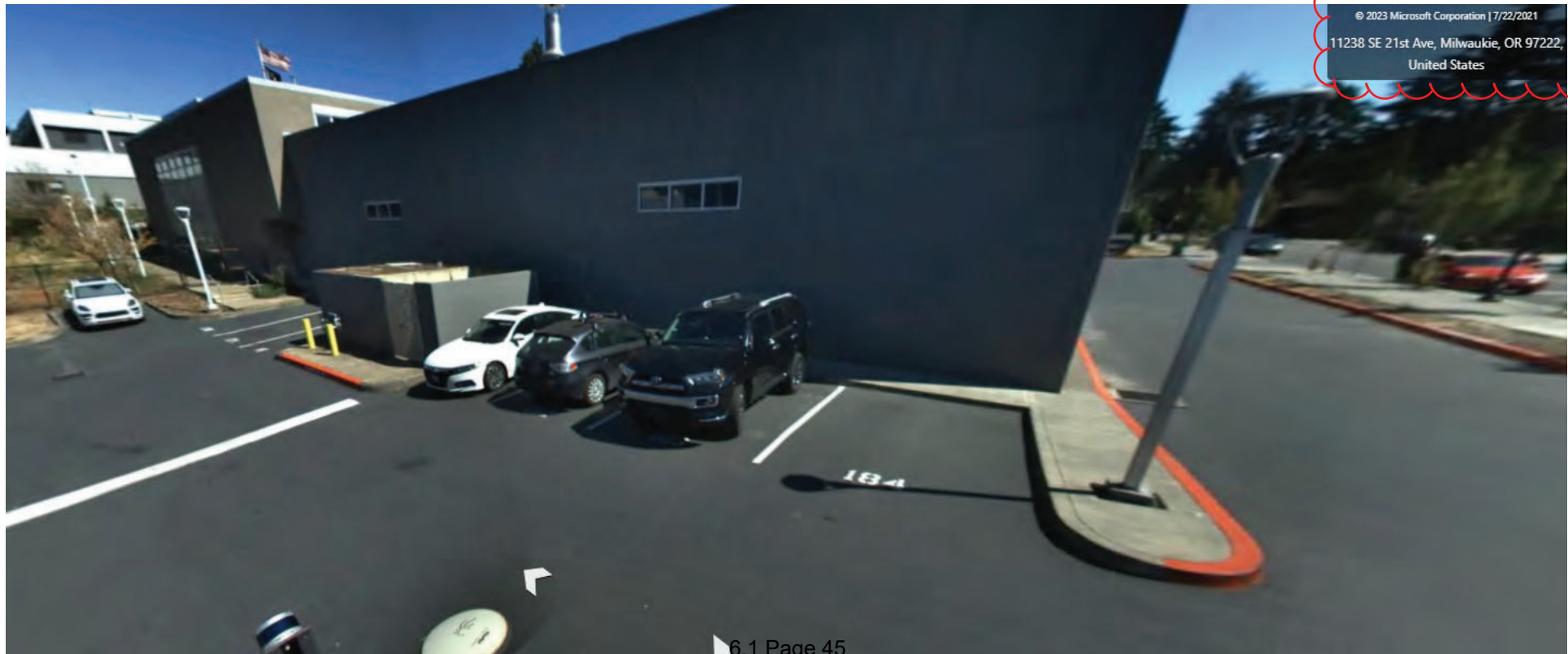
MILWAUKIE HIGH SCHOOL
NORTH CLACKAMAS SCHOOL DISTRICT
2301 SE Willard Street, Milwaukie, OR 97222
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revisions	
phase	RECORD SET
date	05/12/2021
project	117010
SITE AND HORIZONTAL CONTROL PLANS	
C204	



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Attachment 3

Brett Kelter

From: Ray Bryan <ray1bryan2@gmail.com>
Sent: Monday, October 2, 2023 9:55 AM
To: Brett Kelter
Subject: CSU-2023-004

This Message originated outside your organization.

Hi Brett,

Thank you for your time on the phone last Thursday. The information you shared was very helpful. I would like to add my comments to CSU-2023-004

I live near the Milwaukie High/Milwaukie Academy of the Arts campus. I agree with the North Clackamas School District that on any particular school day there are plenty of off street parking spaces for students, staff, vendors and other visitors.

However, my lived experience concludes, peak demand times for parking are not during school hours, rather during events held on evenings and weekends. Many of those events are held at the campus, but the neighboring shared parking partners (churches) also host events that create a substantial demand for parking. I could imagine an equitable parking agreement to use each other's parking when needed.

Speaking for myself, I encourage the North Clackamas School District to host events at the Campus. Thanks to community support the Campus includes the Arts Center, Gymnasiums, and lighted all weather fields and we are fortunate to have nearby food carts and restaurants that offer a variety of menus to satisfy our guests appetites.

Events bring engagement, vitality, interest, and revenue to our community. Organized shared off-street parking is not only better for the resident neighbors, who may have experienced decreased clear vision at intersections, rogue parking, and other safety concerns during these peak events that can be held on windy and rainy nights. Organized shared off-street parking will also result in a better experience for those who visit our fair city: finding a convenient place to park without circling, turning around in someone's driveway, and all the frustrations attendance at a time sensitive event can bring.

Thanks to staff and planning commission members for their time. Please let me know if you have any questions.

Ray Bryan
503-593-3336