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## PROVIDENCE WILLAMETTE FALLS MEDICAL CENTER

### MASTER PLAN MODIFICATION COMPREHENSIVE PLAN AMENDMENT / ZONE CHANGE

**Submitted to:**

The City of Oregon City  
221 Molalla Ave, Suite 200  
PO Box 3040  
Oregon City, OR 97045

Harper Houf Peterson Righellis Inc  
205 SE Spokane Street, Suite 200  
Portland, OR 97202

PKA Architects  
6969 SW Hampton Street  
Portland, OR 97223

# TABLE OF CONTENTS

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## NARRATIVE

I.	Summary of Information	p. 3
II.	Detailed Description of Proposal	p. 5
III.	Master Plan Modification Submittal Requirements and Responses To Approval Criteria	p. 8
IV.	Comprehensive Plan Amendment and Zone Change Submittal Requirements and Responses To Approval Criteria	p. 19

## FIGURES

Figure 01:	Vicinity Map and Existing Zoning
Figure 02:	Existing Ownership Patterns
Figure 03:	Existing Natural Resources, Hazards, and Topography
Figure 04:	Existing Light Locations
Figure 05:	2012 Approved Master Plan
Figure 06:	2015 Proposed Master Plan
Figure 07:	Proposed Site Plan: Circulation/Access & Parking
Figure 08:	Proposed Site Plan: Landscaped and Impermeable Area

## APPENDICES

A.	2012 Master Plan Transportation Impact Analysis
B.	2012 Civil Engineering Narratives
C.	2015 Transportation Impact Analysis for Comprehensive Plan Amendment/Zone Change
D.	2012 Notice of Decision and Conditions of Approval
E.	Photos of Existing Conditions
F.	Neighborhood Meeting Documentation
G.	Pre-Application Notes

## I. SUMMARY OF PROPOSAL

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<b>Applicant/Owner:</b>	Providence Willamette Falls Medical Center C/o Russell Reinhard 1500 Division Street Oregon City, Oregon 97045
<b>Representative:</b>	Harper Houf Peterson Righellis Inc. C/o Stefanie Slyman, AICP 205 SE Spokane Street, Ste. 200 Portland, OR 97202
<b>Request:</b>	Providence Willamette Falls Medical Center (PWF) is seeking approval of two concurrent land use requests to 1) Modify the 2012 Master Plan and 2) Amend the Oregon City Comprehensive Plan and Zoning Map for two properties from Residential/R-6 to Mixed Use Employment (MUE).
<b>Location:</b>	1714 and 1716 16 <sup>th</sup> Street Clackamas County Map 22E32AB Tax Lots 3100, 3000  1806, 1808, 1810, and 1812 15 <sup>th</sup> Street Clackamas County Map 22E32AB Tax Lots 3900, 4000, 4100, 4200  1500 Division Street – PWF Medical Center Clackamas County Map 22E32AB, Tax Lots 1201, 1900, 2000, 2100, 2200, 2400, 2500, 2800, 2900, 3100, 4400, 4600 <sup>1</sup> , Clackamas County Map 22E32AA, Tax Lot 400 Clackamas County Map 22E32AC, Tax Lots 101, 201
<b>Zoning:</b>	Mixed Use Employment (MUE) and R-6 – Single Family Dwelling District
<b>Land Use History:</b>	The PWF Master Plan was approved in 2012 per CP-11-01: Master Plan. A concurrent application for Phase 1 of the master plan, the Division Street Parking Lot, was also approved in 2012 per DP11-03: Detailed Development Plan; NR 11-05: Natural Resource Overlay Exemption; and LL-07: Lot Line Adjustment. Prior to the 2012 Master Plan, PWF received approvals for Site Plan and Design Review and Conditional Use Permit for Hospital Building Expansion with Hospital and Nursing Home Site Improvements. File numbers: CU 03-03 & SP 03-19.

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<sup>1</sup> Tax Lots 4400 and 4600 are owned by PWF but are not part of the proposed modification or Comprehensive Plan/Zone Change.

**Proposal Summary:**

Since the time the Master Plan was approved in 2012, PWF's updated growth projections indicate patient needs will be best met by one medical office building (MOB) up to 35,000 square feet (sf) in size instead of two MOB's totaling up to 50,000 sf, shown in the 2012 Master Plan as West MOB and East MOB. PWF therefore proposes to consolidate these future medical office uses at the West MOB location which is more accessible to patients and more centrally-located within the PWF campus relative to the East MOB location. To achieve this, PWF proposes to increase the site area of the West MOB through the addition of six adjacent properties to provide adequate site area for a 30,000 – 35,000 sf MOB and parking in proximity to the MOB. This will reduce the net amount of total new development approved in the 2012 Master Plan from 104,000 sf to 89,000 sf, and a total buildout of 440,181 sf instead of 455,181 sf.

The intent of this modification is to improve patient access to the West MOB while reducing parking impacts on McLoughlin neighborhood streets by locating parking in proximity to the West MOB. Moreover, the proposal will result in fewer traffic impacts and less parking demand overall from buildout of the master plan due to a net reduction of 15,000 sf of building space on campus.

Subject to approval of this request, PWF intends to submit an application for the West MOB and associated parking at which time it will be reviewed for compliance with applicable design and development standards via the City's detailed development plan process. These standards include building height, setbacks, site coverage, landscaping, and buffering between uses. At that time, a Traffic Impact Analysis will also be submitted to identify any needed transportation safety or capacity improvements, such as improvements to the intersection of Division and 15<sup>th</sup> Streets. The West MOB will continue to be subject to Conditions of Approval resulting from CP 11-01: Master Plan, as revised by this master plan modification, or the future detailed development plan.

## II. DETAILED PROPOSAL AND REQUESTED APPROVALS

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**A. Modification of the 2012 Master Plan.** The following modifications to the 2012 Master Plan are requested.

**Expand Master Plan Boundary.** Add six PWF-owned properties on the west side of Division Street to the master plan boundary. These properties include two properties located at 1714 and 1716 16<sup>th</sup> Street and four properties on the south side of 15<sup>th</sup> Street (1806, 1808, 1810, 1812). This will increase the area within the campus boundary from 746,513 sf to 791,276 sf, an addition of 44,763 sf but will not increase the amount of new development approved in the Master Plan, and will in fact decrease it as described below. These six properties, together with the existing West MOB site as shown in the 2012 Master Plan, will serve as the site of the future West MOB and parking. The intent is to provide parking for patients in closer proximity to the West MOB and to minimize on-street neighborhood parking impacts. No PWF campus development other than the West MOB and parking is proposed in the expanded boundary area.

**Consolidate Medical Office uses and Decrease Overall Campus Development.** Subject to approval of the boundary expansion and concurrent Comprehensive Plan Amendment and Zone Change, PWF proposes to reduce the total amount of MOB square footage in the master plan from 50,000 sf to a maximum of 35,000 sf. The 2012 master plan identified two MOBs, East and West, with 20,000 – 25,000 sf each for a total of 50,000 sf. PWF proposes to consolidate these uses at the West MOB location at a building size no larger than 35,000 sf, resulting in a net reduction of 15,000 sf from the approved 2012 master plan. This will result in a campus-wide reduction from the approved 104,000 sf of net, new building area to 89,000 sf. With the increase in campus size and decrease in development square footage, the floor area ratio (FAR) will decrease from 0.61 to 0.56; nonetheless it will continue to exceed by more than twofold the minimum FAR of 0.25 in the MUE zone.

This reduction in campus square footage will also decrease vehicular trip generation and parking demand as a function of the reduced building square footage. The 2012 Master Plan Transportation Impact Analysis (Appendix A) and 2012 Civil Engineering Narratives documented the impacts of campus buildout at a greater amount of development than is currently proposed, therefore the findings of those analyses remain applicable to this proposal<sup>2</sup>.

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<sup>2</sup> A separate Transportation Impact Analysis for the Comprehensive Plan Amendment/Zone Change request for 1714 and 1716 16<sup>th</sup> Street has been submitted to satisfy Transportation Planning Rule (TPR) requirements. This is a stand-alone analysis for the rezoning of these two properties specifically, not overall campus buildout. Development of specific projects in the Master Plan will require subsequent Transportation Impact Analyses at the time of development review.

**Revise Development Phasing.** Remove references to Phase 3 from the development phasing schedule and clarify that all remaining development projects may occur in any order during existing Phase 2 (Years 2012 – 2021). No change to the 10-year master plan duration or end date of 2021 is requested.

**COMPARISON OF 2012 APPROVED MASTER PLAN AND 2015 PROPOSED MASTER PLAN**

	2012 APPROVED MASTER PLAN	2015 PROPOSED MASTER PLAN
<b>Total Site Area</b>	746,513 sf	Existing = 746,513 sf New = 44,763 sf Total = 791,276 sf
<b>Building Square Footage</b>	Existing = 351,181 sf New = 104,000 sf Total = 455,181 sf	Existing = 351,181 sf New = 89,000 sf Total = 440,181 sf
<b>Floor Area Ratio</b>	0.61	0.56
<b>Total Impervious Area</b>	78%	78%
<b>Total Landscaping</b>	22%	22%
<b>Total Parking Supply</b>	888 spaces (PWF campus-wide parking ratio = 1.95 spaces/1,000sf)	874 – 894 spaces (PWF campus-wide parking ratio = 1.96 – 2.03 spaces/1,000sf)

**B. Comprehensive Plan Amendment / Zone Change for 1714 & 1716 Division Street.**

These two properties, which are two of the six proposed to be brought into the master plan boundary per the master plan modification request, are proposed for a Comprehensive Plan/Zone Change from Residential/R-6 to MUE. The existing R-6 zone does not allow for medical office uses or associated parking. Rezoning these properties to MUE will allow for these properties to be included in the site for the modified West MOB and associated parking.

The MUE zone permits employment-intensive uses such as offices, research and development, light manufacturing, and associated commercial uses, to include hospitals and medical office buildings. This zone is currently applied within the entire master plan boundary, as well as the west side of Division Street for a depth of one to two blocks from 12th and 17th Streets. The two properties proposed for rezoning are bordered by MUE-zoned properties to the east and north, and partially to the south.

Although PWF does not propose to increase the amount of new development approved in the 2012 Master Plan, and in fact, proposes to reduce it by 15,000 sf for a net total of 89,000 sf new campus buildout, for purposes of addressing Oregon's Transportation Planning Rule (TPR) a traffic analysis is required to demonstrate whether the Comprehensive Plan and Zone Change could result in a significant impact on the transportation system developed for stand-alone MUE uses. Accordingly, a 2015 Transportation Impact Analysis (Appendix C) has been submitted with this application and demonstrates there are no significant impacts associated with the zone change, even under these circumstances which PWF does not propose.

### III. MASTER PLAN MODIFICATION SUBMITTAL REQUIREMENTS AND RESPONSES TO APPROVAL CRITERIA

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#### SUBMITTAL REQUIREMENTS

##### 17.65 – Master Plans

##### 17.65.050 - General Development Plan.

##### A. Existing Conditions Submittal Requirements.

1. *Narrative statement. An applicant must submit a narrative statement that describes the following:*

*a. Current uses of and development on the site, including programs or services.*

*b. History or background information about the mission and operational characteristics of the institution that may be helpful in the evaluation of the general development plan.*

**RESPONSE:** PWF is a full service medical center that provides emergency medicine, labor and delivery, surgical services, inpatient treatment, as well as many other inpatient and outpatient services. Since opening in 1954, PWF has grown and gone through numerous developments, additions, and remodels to better provide healthcare services to Oregon City and Clackamas County.

In 2012, Oregon City approved the Master Plan which defined the growth and development strategies for PWF over a 10-year period including public improvements to be made as conditions of approval. (Appendix D) The Master Plan consists of updates and modernization projects, Birthplace expansion, and two medical office buildings for outpatient procedures. In total, the Master Plan approved 104,000 sf of new hospital and medical office uses with associated parking.

Since the time the master plan was approved, PWF developed the 66-space Division Street Parking Lot and made public improvements per the master plan conditions of approval. No other development in the 2012 Master Plan has been initiated to date.

*c. A vicinity map showing the location of the General Development Plan boundary relative to the larger community, along with affected major transportation routes, transit, and parking facilities. At least one copy of the vicinity map must be eight and one-half inches x eleven inches in size, and black and white reproducible.*

*d. Non-institutional uses that surround the development site. May also reference submitted maps, diagrams or photographs.*

**RESPONSE:** See Figure 01: Vicinity Map and Figure 07: Proposed Site Plan: Circulation/Access & Parking.

*e. Previous land use approvals within the General Development Plan boundary and related conditions of approval.*

**RESPONSE:** The PWF Master Plan was approved in 2012 per CP-11-01: Master Plan. A concurrent application for Phase 1 of the master plan, the Division Street Parking Lot, was also approved in 2012 per DP11-03: Detailed Development Plan; NR 11-05: Natural Resource Overlay Exemption; and LL-07: Lot Line Adjustment. Conditions of Approval associated with the approval of those concurrent applications are provided in Appendix D: Notice of Land Use Decision.

Prior to the 2012 Master Plan, PWF received approvals for Site Plan and Design Review and Conditional Use Permit for Hospital Building Expansion with Hospital and Nursing Home Site Improvements. File numbers: CU 03-03 & SP 03-19.

*f. Existing utilization of the site. May also reference submitted maps, diagrams or photographs.*

*g. Site description, including the following items. May also reference submitted maps, diagrams or photographs.*

- 1. Physical characteristics;*
- 2. Ownership patterns;*
- 3. Building inventory;*
- 4. Vehicle/bicycle parking;*
- 5. Landscaping/usable open space;*
- 6. FAR/lot coverage;*
- 7. Natural resources that appear on the city's adopted Goal 5 inventory;*
- 8. Cultural/historic resources that appear on the city's adopted Goal 5 inventory; and*
- 9. Location of existing trees six inches in diameter or greater when measured four feet above the ground. The location of single trees shall be shown. Trees within groves may be clustered together rather than shown individually.*

**RESPONSE:** This information is in photographs provided in Appendix E and the following figures. No cultural or historic resources that appear on the city's adopted Goal 5 inventory are located on the site.

Figure 01: Vicinity Map and Existing Zoning

Figure 02: Existing Ownership Patterns

Figure 03: Existing Natural Resources, Hazards, and Topography

Figure 04: Existing Light Locations

Figure 05: 2012 Approved Master Plan

*h. Existing transportation analysis, including the following items. May also reference submitted maps, diagrams or photographs.*

- 1. Existing transportation facilities, including highways, local streets and street classifications, and pedestrian and bicycle access points and ways;*
- 2. Transit routes, facilities and availability;*
- 3. Alternative modes utilization, including shuttle buses and carpool programs; and*
- 4. Baseline parking demand and supply study (may be appended to application or waived if not applicable).*

**RESPONSE:** See Figure 07: Proposed Site Plan: Circulation/Access & Parking which shows both existing and proposed conditions, and site photos in Appendix E. See also Appendix A which includes the Transportation Impact Analysis and Parking Study submitted with 2012 Master Plan. This analysis demonstrated sufficient transportation and capacity is available, or can be made available, with buildout of the master plan. As the proposed master plan modification will result in a net reduction in buildout square footage, the previously-submitted documentation remains in effect and provides the required documentation.

*i. Infrastructure facilities and capacity, including the following items.*

- 1. Water;*
- 2. Sanitary sewer;*
- 3. Stormwater management; and*
- 4. Easements.*

**RESPONSE:** See Appendix B for Civil Engineering (public infrastructure) Narratives submitted with 2012 Master Plan and which demonstrate that sufficient capacity is available, or can be made available, for the master plan. As the proposed improvements will result in a net reduction in campus development, the previously-submitted narratives are still applicable to the modified master plan.

## **B. Proposed Development Submittal Requirements.**

*1. Narrative statement. An applicant shall submit a narrative statement that describes the following:*

*a. The proposed duration of the general development plan.*

**RESPONSE:** No change is proposed with this modification. The duration remains 10 years with an end date of 2021.

*b. The proposed development boundary. May also reference submitted maps or diagrams.*

**RESPONSE:** The proposed boundary expansion is shown on Figure 06.

*c. A description, approximate location, and timing of each proposed phase of development, and a statement specifying the phase or phases for which approval is sought under the current application. May also reference submitted maps or diagrams.*

**RESPONSE:** See Figure 06: 2015 Proposed Master Plan which shows that all remaining master plan development is to occur under Phase 2, which runs from Years 2012 – 2021. Phase 3 (Years 2014 – 2021) is proposed to be eliminated as it is redundant with Phase 2. The modification also seeks to clarify that improvements within Phase 2 may be undertaken in any order.

*d. An explanation of how the proposed development is consistent with the purposes of Section 17.65, the institutional zone, and any applicable overlay district.*

**RESPONSE:** The 2012 Master Plan demonstrated consistency with the purposes of Section 17.65 which states the intent of master plans is to foster the growth of major institutions and other large-scale development, while identifying and mitigating the impacts of such growth on surrounding properties and public infrastructure. The proposed modification of the 2012 Master Plan remains consistent with this intent.

*e. A statement describing the impacts of the proposed development on inventoried Goal 5 natural, historic or cultural resources within the development boundary or within two hundred fifty feet of the proposed development boundary.*

**RESPONSE:** The proposed master plan modification does not impact inventoried natural, historic, or cultural resources within the proposed development boundary. See Figure 03: Existing Natural Resources, Hazards, and Topography which shows the existing approved Master Plan relative to these inventoried resources. Removal of the East MOB and consolidation of medical office uses at the West MOB location will provide a greater distance from both natural resources and natural hazards mapped on the east side of the campus.

*f. An analysis of the impacts of the proposed development on the surrounding community and neighborhood, including:*

- 1. Transportation impacts as prescribed in subsection g. below;*
- 2. Internal parking and circulation impacts and connectivity to sites adjacent to the development boundary and public right-of-ways within two hundred fifty feet of the development boundary;*

3. *Public facilities impacts (sanitary se[w]er, water and stormwater management) both within the development boundary and on city-wide systems;*
4. *Neighborhood livability impacts;*
5. *Natural, cultural and historical resource impacts within the development boundary and within two hundred fifty feet of the development boundary.*

**RESPONSE:** Existing analyses for the approved 2012 Master Plan have documented transportation impacts, parking and circulation impacts, connectivity, public facilities, and natural resource impacts which remain applicable and unchanged by the proposed master plan modification, especially as the proposed master plan will result in less 15,000 sf less development than is currently approved.

Regarding item 4. Neighborhood livability impacts, PWF representatives attended a meeting with the McLoughlin Neighborhood Association (MNA) on June 4, 2015 to present the proposal and seek to solicit neighborhood input. Documentation of the first meeting, which satisfied the neighborhood meeting requirement, is included in Appendix F. At the request of the MNA, PWF representatives met a second time with a subgroup of the MNA on June 30, 2015 at which time PWF presented a modified proposal which removed property on 14<sup>th</sup> Street from the proposal.

There are no anticipated impacts to neighborhood livability from this proposal as the overall amount of development and associated traffic and parking impacts will decrease from the current master plan.

*g. A summary statement describing the anticipated transportation impacts of the proposed development. This summary shall include a general description of the impact of the entire development on the local street and road network, and shall specify the maximum projected average daily trips, projected AM and PM peak hour traffic and the maximum parking demand associated with build-out each phase of the master plan.*

**RESPONSE:** As noted in the existing conditions section, Appendix A includes the Transportation Impact Analysis and Parking Study submitted with 2012 Master Plan. This analysis demonstrated sufficient transportation and capacity is available, or can be made available, with buildout of the master plan. As the proposed improvements will result in a net reduction in campus development, no further documentation is needed for the requested master plan modification.

*h. In addition to the summary statement of anticipated transportation impacts, an applicant shall provide a traffic impact study as specified by city requirements. The transportation impact study shall either:*

1. *Address the impacts of the development of the site consistent with all phases of the general development plan; or*
2. *Address the impacts of specific phases if the city engineer determines that the traffic impacts of the full development can be adequately evaluated without specifically addressing subsequent phases.*

**RESPONSE:** A traffic impact study for the Comprehensive Plan and Zone Change application for two of the subject properties has been prepared (Appendix C) and is addressed in the approval criteria for that land use request. As previously noted, development of the West MOB and associated parking will be subject to a future traffic study specific to this development when an application for development review is submitted.

*i. If an applicant chooses to pursue option h.1., the applicant may choose among three options for implementing required transportation capacity and safety improvements:*

1. *The General Development Plan may include a phasing plan for the proposed interior circulation system and for all on-site and off-site transportation capacity and safety improvements required on the existing street system as a result of fully implementing the plan. If this option is selected, the transportation phasing plan shall be binding on the applicant.*
2. *The applicant may choose to immediately implement all required transportation safety and capacity improvements associated with the fully executed general development plan. If this option is selected, no further transportation improvements will be required from the applicant. However, if a general development plan is later amended in a manner so as to cause the projected average daily trips, the projected AM or PM peak hour trips, or the peak parking demand of the development to increase over original projections, an additional transportation impact report shall be required to be submitted during the detailed development plan review process for all future phases of the development project and additional improvements may be required.*
3. *The applicant may defer implementation of any and all capacity and safety improvements required for any phase until that phase of the development reaches the detailed development plan stage. If this option is selected, the applicant shall submit a table linking required transportation improvements to vehicle trip thresholds for each development phase.*

**RESPONSE:** A traffic study for the master plan modification request is not required; therefore, this is not applicable.

*j. The applicant or city staff may propose objective development standards to address identified impacts that will apply within the proposed development on land that is controlled by the institution. Upon approval of the general development plan, these standards will*

*supersede corresponding development standards found in this code. Development standards shall address at least the following:*

- 1. Pedestrian, bicycle and vehicle circulation and connectivity;*
- 2. Internal vehicle and bicycle parking;*
- 3. Building setbacks, landscaping and buffering;*
- 4. Building design, including pedestrian orientation, height, bulk, materials, ground floor windows and other standards of Chapter 17.62; and*
- 5. Other standards that address identified development impacts.*

**RESPONSE:** No alternate development standards are proposed.

*2. Maps and diagrams. The applicant must submit, in the form of scaled maps or diagrams, as appropriate, the following information:*

- a. A preliminary site circulation plan showing the approximate location of proposed vehicular, bicycle, and pedestrian access points and circulation patterns, parking and loading areas or, in the alternative, proposed criteria for the location of such facilities to be determined during detailed development plan review.*
- b. The approximate location of all proposed streets, alleys, other public ways, sidewalks, bicycle and pedestrian access ways and other bicycle and pedestrian ways, transit streets and facilities, neighborhood activity centers and easements on and within two hundred fifty feet of the site. The map shall identify existing subdivisions and development and un-subdivided or unpartitioned land ownerships adjacent to the proposed development site and show how existing streets, alleys, sidewalks, bike routes, pedestrian/bicycle access ways and utilities within two hundred fifty feet may be extended to and/or through the proposed development.*
- c. The approximate location of all public facilities to serve the proposed development, including water, sanitary sewer, stormwater management facilities.*
- d. The approximate projected location, footprint and building square footage of each phase of proposed development.*
- e. The approximate locations of proposed parks, playgrounds or other outdoor play areas; outdoor common areas and usable open spaces; and natural, historic and cultural resource areas or features proposed for preservation. This information shall include identification of areas proposed to be dedicated or otherwise preserved for public use and those open areas to be maintained and controlled by the owners of the property and their successors in interest for private use.*

**RESPONSE:** See the following figures which show the proposed 2015 Master Plan elements.

Figure 06: 2015 Proposed Master Plan

Figure 07: Proposed Site Plan: Circulation/Access & Parking

Figure 08: Proposed Site Plan: Landscaped and Impermeable Area

See also Appendix A in the Transportation Impact Analysis and Parking Study submitted with 2012 Master Plan and Appendix B which includes the Civil Engineering (Public Infrastructure) Narrative, which remain in effect with the modified 2015 Master Plan.

## RESPONSES TO APPROVAL CRITERIA

### 17.04 Definitions

#### 17.04.710 - Major modification.

*"Major modification" means any of the following changes from a previously approved permit, requiring the application to return through the same process as the original review:*

3. *For any site plan or design review approval, a reduction in the amount of landscaping, open space or land reserved for a protected feature of ten percent or more or the relocation of buildings, streets, access points onto the existing public right-of-way, utility easements, pedestrian/bicycle accessways, parking lots, landscaping, or other site improvements away from the previously approved general location;*

**RESPONSE:** The proposed modification to the Master Plan meets the definition of a major modification as it involves modifications to building and parking locations.

### 17.65 Master Plans

#### 17.65.040 - Procedure.

*A. Preapplication Review. Prior to filing for either general development plan or detailed development plan approval, the applicant shall file a pre-application conference pursuant to Section 17.50.030.*

**RESPONSE:** A preapplication meeting was held on May X, 2015. Preapplication notes are provided in Appendix G.

*B. General Development Plan. An application for a General Development Plan describing the long-term buildout of the site shall be reviewed through a Type III procedure. An applicant must have an approved General Development Plan before any detailed development plan may be approved, unless both are approved or amended concurrently. Amendments to an approved General Development Plan shall be reviewed under a Type III procedure pursuant to Section 17.65.080.*

**RESPONSE:** The Master Plan modification is proposed concurrently with a Comprehensive Plan Amendment and Zone Change, a Type IV review, which elevates the review of the master plan modification to a Type IV review.

*C. Detailed Development Plan. An application for a detailed development plan, is processed through a Type II procedure, as long as it is in conformance with the approved general development plan. Amendments to an approved detailed development plan shall be processed pursuant to Section 17.65.080. Once a development has an approved detailed development plan, Chapter 17.62 Site Plan and Design Review is not required.*

**RESPONSE:** Subject to approval of the concurrent master plan modification and Comprehensive Plan Amendment and Zone Change, PWF intends to submit a detailed development plan for the West MOB and associated parking in conformance with the 2015 Master Plan.

*D. Concurrent Review. An applicant may concurrently apply for a general development plan and a detailed development plan, or any phase of a detailed development plan. Such a concurrent application is reviewed through a Type III procedure. (Ord. 03-1014, Att. B3 (part), 2003)*

**RESPONSE:** PWF has not applied for concurrent review of the master plan modification and detailed development plan.

#### **17.65.80 - Amendments to approved plans.**

*A. When Required. An amendment to an approved General Development Plan or detailed development plan is required for any use or development that is not in conformance with the applicable plan, as provided below. The approval criteria contained in Section 17.65.050 will apply to general development plan amendments, the approval criteria contained in Section 17.65.060 will apply to detailed development plan amendments. The thresholds and procedures for amendments are stated below.*

*B. Type III Procedure. Unless the approved general development plan or detailed development plan specifically provides differently, amendments to either plan that require a Type III procedure are:*

**RESPONSE:** The Master Plan modification is subject to the approval criteria contained in Section 17.65.060 as demonstrated in the following section. Although the proposal meets the threshold for a Type III review, because it is proposed concurrently with a Comprehensive Plan Amendment and Zone Change, a Type IV review, this elevates the review of the master plan modification to a Type IV procedure.

*C. Approval Criteria for a General Development Plan. The planning commission shall approve an application for general development plan approval only upon finding that the following approval criteria are met.*

*1. The proposed General Development Plan is consistent with the purposes of Section 17.65.*

**RESPONSE:** The 2012 Master Plan demonstrated consistency with the purposes of Section 17.65 which states the intent of master plans is to foster the growth of major institutions and other large-scale development, while identifying and mitigating the impacts of such growth on surrounding properties

and public infrastructure. The proposed modification of the 2012 Master Plan remains consistent with this intent; therefore this criterion is met.

2. *Development shall demonstrate compliance with Chapter 12.04, Streets, Sidewalks and Public Places*

**RESPONSE:** The 2012 Master Plan was found to be in compliance with Chapter 12.04 as proposed or through conditions of approval. The proposed modification of the master plan reduces the total amount of campus development, and makes otherwise de minimis changes; therefore, the master plan remains in compliance with Chapter 12.04 and this criterion is met.

3. *Public services for water supply, police, fire, sanitary waste disposal, and storm-water disposal are capable of serving the proposed development, or will be made capable by the time each phase of the development is completed.*

**RESPONSE:** The 2012 Master Plan was found to be capable of serving the proposed development, or able to be made capable with future detailed development plans. As the proposed modification reduces the amount of overall campus development, the finding that public services can be provided remains in effect with the master plan modification and this criterion is met.

4. *The proposed General Development Plan protects any inventoried Goal 5 natural, historic or cultural resources within the proposed development boundary consistent with the provisions of applicable overlay districts.*

**RESPONSE:** Removal of the East MOB and consolidation of medical office uses at the West MOB location will provide a greater distance from natural resources and natural hazards mapped on the east side of the campus, thereby providing greater protection of natural resources than the current Master Plan. There are no historic or cultural resources within the proposed development boundary. This criterion is met.

5. *The proposed General Development Plan, including development standards and impact mitigation thresholds and improvements adequately mitigates identified impacts from each phase of development. For needed housing, as defined in ORS 197.303(1), the development standards and mitigation thresholds shall contain clear and objective standards.*

**RESPONSE:** The 2012 Master Plan Notice of Decision includes conditions of approval that address mitigation that will remain in effect except where revisions are made to reflect removal of the East MOB, the increased size of the West MOB, the parking to be provided on the west side of the campus, and the overall reduction in campus development and related trip generation and parking demand. No housing is proposed. This criterion is met.

6. *The proposed general development plan is consistent with the Oregon City Comprehensive Plan and its ancillary documents.*

**RESPONSE:** The approved 2012 Master Plan was deemed to be consistent with the Oregon City Comprehensive Plan and its ancillary documents. The de minimis modifications proposed for the 2015 Master Plan do not change this consistency; therefore, this criterion is met.

## IV. COMPREHENSIVE PLAN AMENDMENT AND ZONE CHANGE SUBMITTAL REQUIREMENTS AND RESPONSES TO APPROVAL CRITERIA

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### SUBMITTAL REQUIREMENTS

#### 17.68.010 - Initiation of the amendment.

*A text amendment to this title or the comprehensive plan, or an amendment to the zoning map or the comprehensive plan map, may be initiated by:*

- A. A resolution request by the city commission;*
- B. An official proposal by the planning commission;*
- C. An application to the planning division presented on forms and accompanied by information prescribed by the planning commission.*
- D. A Legislative request by the Planning Division.*

**RESPONSE:** A complete application has been filed with the planning division to initiate the request.

### RESPONSES TO APPROVAL CRITERIA

#### 17.68 Zoning Changes and Amendments

##### 17.68.020 - Criteria.

- A. The proposal shall be consistent with the goals and policies of the comprehensive plan.*

**RESPONSE:** The properties on 16<sup>th</sup> Street which are proposed for a Comprehensive Plan Amendment from Residential to Employment and Zoning District change from R-6 to Mixed Use Employment are subject to the following Oregon City Comprehensive Plan polices as identified at the Preapplication conference.

**Goal 1.1 Citizen Involvement Program** *Implement a Citizen Involvement Program that will provide an active and systematic process for citizen participation in all phases of the land-use decisionmaking process to enable citizens to consider and act upon a broad range of issues affecting the livability, community sustainability, and quality of neighborhoods and the community as a whole.*

**Policy 1.1.1** *- Utilize neighborhood associations as the vehicle for neighborhood-based input to meet the requirements of the Land Conservation and Development Commission (LCDC) Statewide Planning Goal 1,*

*Citizen Involvement. The Citizen Involvement Committee (CIC) shall serve as the officially recognized citizen committee needed to meet LCDC Statewide Planning Goal 1.*

**Goal 1.2** *Community and Comprehensive Planning - Ensure that citizens, neighborhood groups, and affected property owners are involved in all phases of the comprehensive planning program.*

**Policy 1.2.1** - *Encourage citizens to participate in appropriate government functions and land-use planning.*

**Goal 1.3** *Community Education - Provide education for individuals, groups, and communities to ensure effective participation in decision-making processes that affect the livability of neighborhoods.*

**Goal 1.4** *Community Involvement - Provide complete information for individuals, groups, and communities to participate in public policy planning and implementation of policies.*

**Policy 1.4.1** - *Notify citizens about community involvement opportunities when they occur.*

**RESPONSE:** Section 1 establishes goals and policies that the City should strive to implement and meet but it does not impose requirements on a master plan application. The application will be advertised in the local newspaper, the master plan site will be posted with a notice of the Planning Commission hearing and surrounding property owners, and the CIC will be mailed notice of the application and the public hearing. This section can be satisfied.

**Goal 2.4** *Neighborhood Livability - Provide a sense of place and identity for residents and visitors by protecting and maintaining neighborhoods as the basic unit of community life in Oregon City while implementing the goals and policies of the other sections of the Comprehensive Plan.*

**Policy 2.4.2** *Strive to establish facilities and land uses in every neighborhood that help give vibrancy, a sense of place, and a feeling of uniqueness; such as activity centers and points of interest.*

**Policy 2.4.4** *Where environmental constraints reduce the amount of buildable land, and/or where adjacent land differs in uses or density, implement Comprehensive Plan and zoning designations that encourage compatible transitional uses.*

**Policy 2.4.5** - *Ensure a process is developed to prevent barriers in the development of neighborhood schools, senior and childcare facilities, parks, and other uses that serve the needs of the immediate area and the residents of Oregon City.*

**RESPONSE:**

**Policy 2.7.1** *Maintain a sufficient land supply within the city limits and the Urban Growth Boundary to meet local, regional, and state requirements for accommodating growth.*

**Policy 2.7.2** *Use the following 11 land-use classifications on the Oregon City Comprehensive Plan Land-Use Map to determine the zoning classifications that may be applied to parcels:*

**RESPONSE:** This Goal and policies directs the City to maintain neighborhood livability while implementing other goals and policies of other sections of the Comprehensive Plan. This proposal is consistent with this policy by reinforcing the role of the hospital in the community and focusing growth in an established location which will promote vibrancy and access to care while remaining compatible with the surrounding residential areas. The rezoning of two properties will not negatively affect the City's 870 acre supply of R-6 zoned property, and is a de minimis addition of MUE zoned property in a location which the City has already identified for such uses.

**Goal 6.1 Air Quality-** *Promote the conservation, protection and improvement of the quality of the air in Oregon City.*

**Policy 6.1.1** *Promote land-use patterns that reduce the need for distance travel by single-occupancy vehicles and increase opportunities for walking, biking and/or transit to destinations such as places of employment, shopping and education.*

**Goal 6.4 Noise-** *Prevent excessive noise that may jeopardize the health, welfare, and safety of the citizens or degrade the quality of life.*

**RESPONSE:** The proposed comprehensive plan amendment and rezoning of two of the subject properties will support a land use pattern that facilitates the development of the West MOB building directly on Division Street where it has direct access to public transit and sidewalks. As the overall master plan building square footage will be decreased and the medical office uses will be consolidated in one location, no impacts on air quality or noise are anticipated.

**Goal 9.1 Improve Oregon City's Economic Health -** *Provide a vital, diversified, innovative economy including an adequate supply of goods and services and employment opportunities to work toward an economically reasonable, ecologically sound and socially equitable economy.*

**RESPONSE:** Section 9 establishes goals and policies that the City should strive to implement and meet but does not impose mandatory approval standards for a master plan application. The comprehensive plan amendment and rezoning of the two subject properties with concurrent master plan modification will reinforce the role of the hospital in the community and contribute to the community's economic development.

**Goal 10.1 Diverse Housing Opportunities -** *Provide for the planning, development and preservation of a variety of housing types and lot sizes.*

**RESPONSE:** The proposal will remove two single family homes from the City's housing stock which will have de minimis effect on the City's housing opportunities. The City has a current inventory of 870.34 acres of R-6 zoned property in the City which will not be affected by the approximate 0.5 acres of R-6 rezoned to MUE in this location.

*Policy 11.1.4 - Support development on underdeveloped or vacant buildable land within the city where public facilities and services are available or can be provided and where land-use compatibility can be found relative to the environment, zoning, and Comprehensive Plan goals.*

*Policy 11.1.6 - Enhance efficient use of existing public facilities and services by encouraging development at maximum levels permitted in the Comprehensive Plan, implementing minimum residential densities, and adopting an Accessory Dwelling Unit Ordinance to infill vacant land.*

**Goal 11.6** *Transportation Infrastructure - Optimize the City's investment in transportation infrastructure.*

**RESPONSE:** This section addresses the need for the City to provide public services in accordance with the community's needs as a whole rather than be forced to respond to individual developments as they occur. Oregon City has adopted master plans to address public infrastructure. The master plan application will satisfy these master plans and the Oregon City Municipal Code. Appropriate conditions of approval can be included to address any needed mitigation to ensure that adequate infrastructure is provided.

**Goal 12.1** *Land Use-Transportation Connection - Ensure that the mutually supportive nature of land use and transportation is recognized in planning for the future of Oregon City.*

*Policy 12.1.4 - Provide walkable neighborhoods. They are desirable places to live, work, learn and play, and therefore a key component of smart growth.*

**RESPONSE:**

This section provides for a safe, convenient and economic transportation system that functions well and contributes to the city's well-being, enhances the quality of life and increases the opportunity for growth and development. The July 23, 2015 Transportation Impact Analysis provided in Appendix C demonstrates that the proposed comprehensive plan amendment and rezoning will not adversely affect public streets.

**Goal 13.2** *Energy Conservation- Plan public and private development to conserve energy.*

*Policy 13.2.1- Promote mixed-use development, increased densities near activity centers, and home-based occupations (where appropriate).*

**RESPONSE:** This section requires the conservation of energy in all forms through efficient land-use patterns, public transportation, building siting and construction standards, and city programs, facilities and activities. The policies promote energy conservation through the promotion of mixed-use developments and increased densities near activity centers, and the construction of bikeways and sidewalks to improve connectivity. The proposed comprehensive plan amendment and rezoning meets this section because it encourages the continued development of the medical campus at a location which is easily reached from other city areas.

**Goal 14.2** *Orderly Redevelopment of Existing City Areas- Reduce the need to develop land within the Urban Growth Boundary by encouraging redevelopment of underdeveloped or blighted areas within the existing city limits.*

**Policy 14.2.1** - *Maximize public investment in existing public facilities and services by encouraging redevelopment as appropriate.*

**Policy 14.2.2** - *Encourage redevelopment of city areas currently served by public facilities through regulatory and financial incentives.*

**Policy 14.3.1** - *Maximize new public facilities and services by encouraging new development within the Urban Growth Boundary at maximum densities allowed by the Comprehensive Plan.*

**RESPONSE:** The addition of properties and rezoning will facilitate the PWF master plan development and allow for at the densities intended for MUE that maximize public investment in existing public facilities and services.

*B. That public facilities and services (water, sewer, storm drainage, transportation, schools, police and fire protection) are presently capable of supporting the uses allowed by the zone, or can be made available prior to issuing a certificate of occupancy. Service shall be sufficient to support the range of uses and development allowed by the zone.*

**RESPONSE:** The site is currently served by public facilities and services and the range of uses and development allowed by the zone is capable of being served prior to issuance of a certificate of occupancy.

*C. The land uses authorized by the proposal are consistent with the existing or planned function, capacity and level of service of the transportation system serving the proposed zoning district.*

**RESPONSE:** As documented in the July 23, 2015 Transportation Impact Analysis provided in Appendix C, the proposed rezoning will not result in significant impacts on the transportation system.

*D. Statewide planning goals shall be addressed if the comprehensive plan does not contain specific policies or provisions which control the amendment.*

**RESPONSE:** The Oregon City Comprehensive Plan contains specific policies and provisions which control the proposed Comprehensive Plan Amendment and Zone Change; therefore, statewide planning goals do not need to be addressed.