



**TYPE IV APPLICATION
STAFF REPORT AND RECOMMENDATION**
October 29, 2015

FILE NUMBER: ZC 15-04: Zone Change
PZ 15-02: Amendment to the Comprehensive Plan
CP 15-02: Master Plan Amendment

**APPLICANT/
OWNER:** Providence Willamette Falls Medical Center, c/o Russell Reinhard
1500 Division Street, Oregon City, Oregon 97045

REPRESENTATIVE: Harper Houf Peterson Righellis Inc., c/o Stefanie Slyman, AICP
205 SE Spokane Street, Suite 200, Portland, Oregon 97202

REQUEST: Providence Willamette Falls Medical Center (PWF) is seeking to amend a previously approved Master Plan and change the Oregon City Comprehensive Plan and Zoning Map for two properties from Low Density Residential/"R-6" Single-family Dwelling District to Mixed Use Employment/"MUE" Mixed Use Employment District.

LOCATION: Clackamas County 2-2E-32AB, Tax Lots 1201, 1900, 2000, 2100, 2200, 2300, 2400, 2500, 2800, 2900, 3000, 3100, 3900, 4000, 4100, 4200, Clackamas County 2-2E-32AA, Tax Lot 400, Clackamas County 2-2E-32AC, Tax Lots 101, 201, 7200

REVIEWERS: Laura Terway, AICP, Planner
Wendy Marshall, P.E., Development Projects Manager

RECOMMENDATION: Approval with Conditions.

PROCESS: Type IV decisions include only quasi-judicial plan amendments and zone changes. These applications involve the greatest amount of discretion and evaluation of subjective approval standards and must be heard by the city commission for final action. The process for these land use decisions is controlled by ORS 197.763. At the evidentiary hearing held before the planning commission, all issues are addressed. If the planning commission denies the application, any party with standing (i.e., anyone who appeared before the planning commission either in person or in writing) may appeal the planning commission denial to the city commission. If the planning commission denies the application and no appeal has been received within ten days of the issuance of the final decision then the action of the planning commission becomes the final decision of the city. If the planning commission votes to approve the application, that decision is forwarded as a recommendation to the city commission for final consideration. In either case, any review by the city commission is on the record and only issues raised before the planning commission may be raised before the city commission. The city commission decision is the city's final decision and is appealable to the land use board of appeals (LUBA) within twenty-one days of when it becomes final.

IF YOU HAVE ANY QUESTIONS ABOUT THIS APPLICATION, PLEASE CONTACT THE PLANNING DIVISION OFFICE AT (503) 722-3789.

RECOMMENDED CONDITIONS OF APPROVAL
Files ZC 15-04, PZ 15-02 and CP 15-02

(DS) = Verify that condition of approval has been met with the Development Services Division.
(P) = Verify that condition of approval has been met with the Planning Division.

Prior to Issuance of a Permit associated with the Proposed Development:

1. Future development shall comply with Planning file CP 11-01 and any amendments within this application.
2. Upon submission of a Detailed Development Plan for the adjacent property, the design and construction of the adjacent public improvements shall be analyzed and implemented prior to issuance of permits. *(DS)*
3. Prior to issuance of permits associated with a Detailed Development Plan the applicant shall demonstrate that the Providence Willamette Falls campus associated with the Master Plan complies with the with the number of parking spaces required in OCMC 17.52.020. *(P)*

I. BACKGROUND:

1. Land Use History

The applicant indicated that:

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.

Figure 1. Vicinity Map

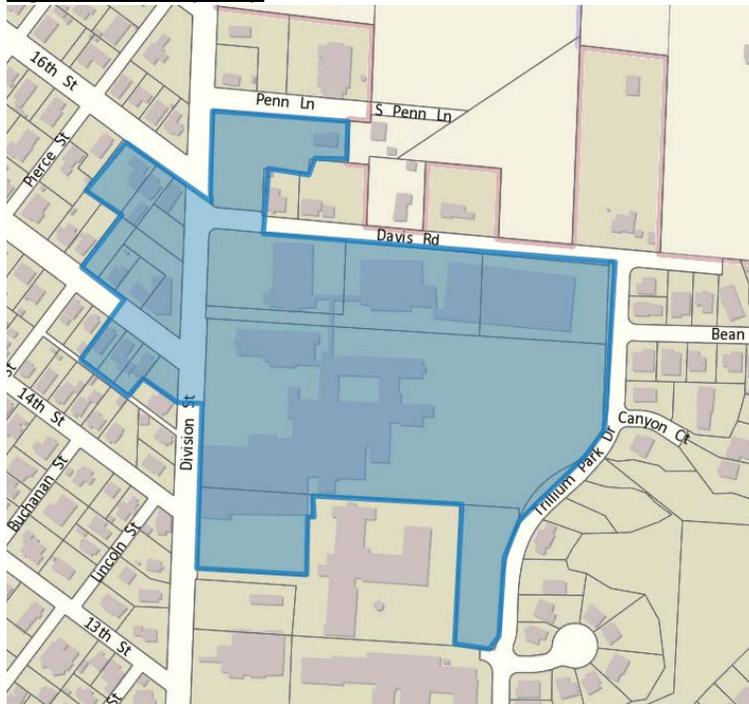


Figure 2: Existing Conditions – Aerial Image



2. Project Description

Providence Willamette Falls Medical Center (PWF) is seeking amend a previously approved Master Plan and change the Oregon City Comprehensive Plan and Zoning Map for two properties from Low Density Residential/"R-6" Single-family Dwelling District to Mixed Use Employment/"MUE" Mixed Use Employment District (Exhibit 2). The applicant indicated that:

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 15th 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.

Master Plan Amendment:

The following modifications to the 2012 Master Plan (Exhibit 8) are requested.

- **Expand Master Plan Boundary.** This proposal would add six properties on the west side of Division Street to the Master Plan boundary. These expansion area includes two properties on 16th Street (1714 and 1716 16th Street) and four properties on the south side of 15th Street (1806, 1808, 1810, 1812 15th). This will increase the area of the campus boundary from 746,513 square feet to 791,276 square feet, an addition of 44,763 square feet (approximately 1 acre). 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.** This proposal would reduce the total amount of MOB square footage in the master plan. The 2012 master plan identified an East and West MOB (20,000 – 25,000 square feet each) for a total of approximately 50,000 square feet. PWF proposes to consolidate these uses at the West MOB location with a building size of 30,000 - 35,000 square feet, resulting in a in a net reduction from the approved 2012 master plan. This will result in a campus-wide reduction from the approved 104,000 square feet of new building area to 84,000 - 89,000 square feet. The applicant provided the following comparison of the 2012 and 2015 Master Plan in Exhibit 2.

COMPARISON OF 2012 APPROVED MASTER PLAN AND 2015 PROPOSED MASTER PLAN

	2012 APPROVED MASTER PLAN	2015 PROPOSED MASTER PLAN
Total Site Area	746,513 sf	Existing = 746,513 sf New = 44,763 sf Total = 791,276 sf
Building Square Footage	Existing = 351,181 sf New = 104,000 sf Total = 455,181 sf	Existing = 351,181 sf New = 89,000 sf Total = 440,181 sf
Floor Area Ratio	0.61	0.56
Total Impervious Area	78%	78%
Total Landscaping	22%	22%
Total Parking Supply	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)

- **Revise Development Phasing.** This proposal would remove references to Phase 3 and allow the project previously identified in Phase 3 to be constructed in Phase 2. All remaining development projects may occur in any order during existing Phase 2 (Years 2012 - 2021).

Comprehensive Plan Amendment / Zone Change for 1714 & 1716 16th Street. This application proposes to change the Comprehensive Plan and Zoning Designation of two properties from Low Density Residential/“R-6” Single-Family Dwelling District to Mixed Use Employment/“MUE” Mixed Use Employment District so the land may be added to the Master Plan to accommodate the modified West MOB and associated parking. The MUE District 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.

Figure 3: Proposed Amendment

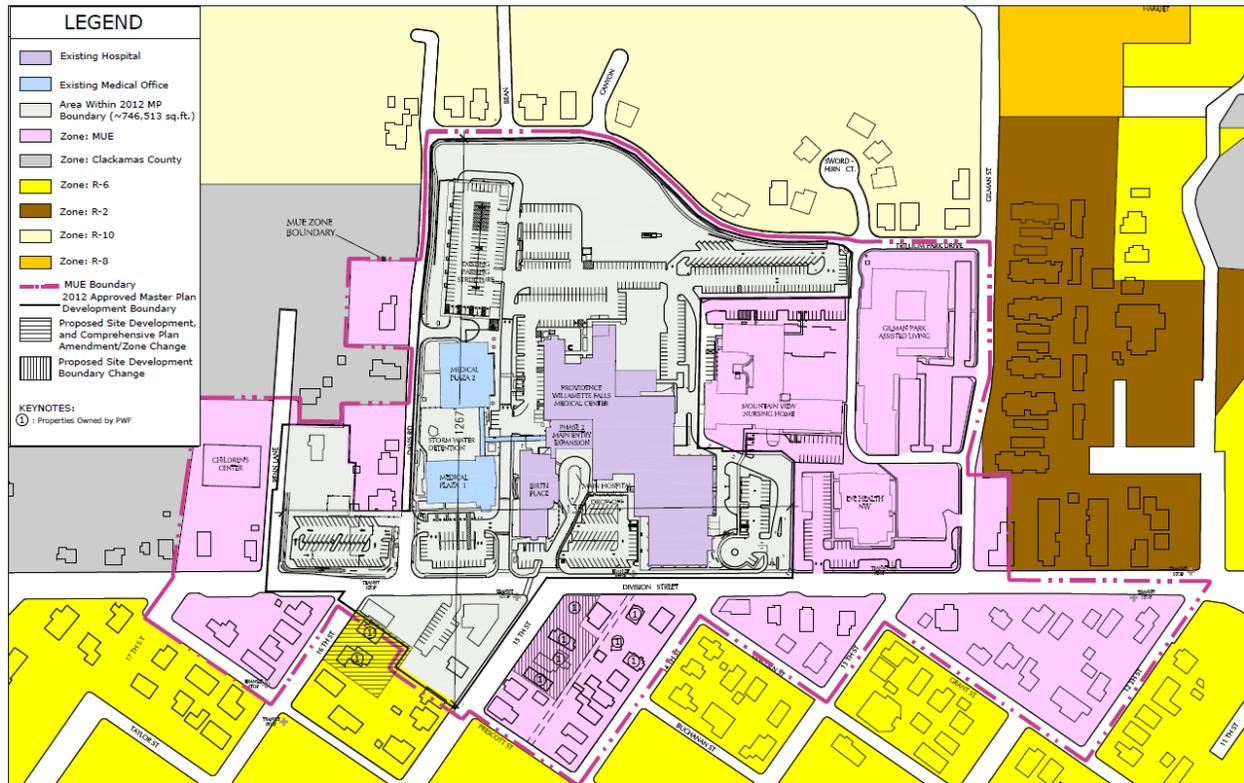


Figure 4: Approved Master Plan



Figure 5: Excerpt from Approved Master Plan



Figure 6: Current Zoning Map

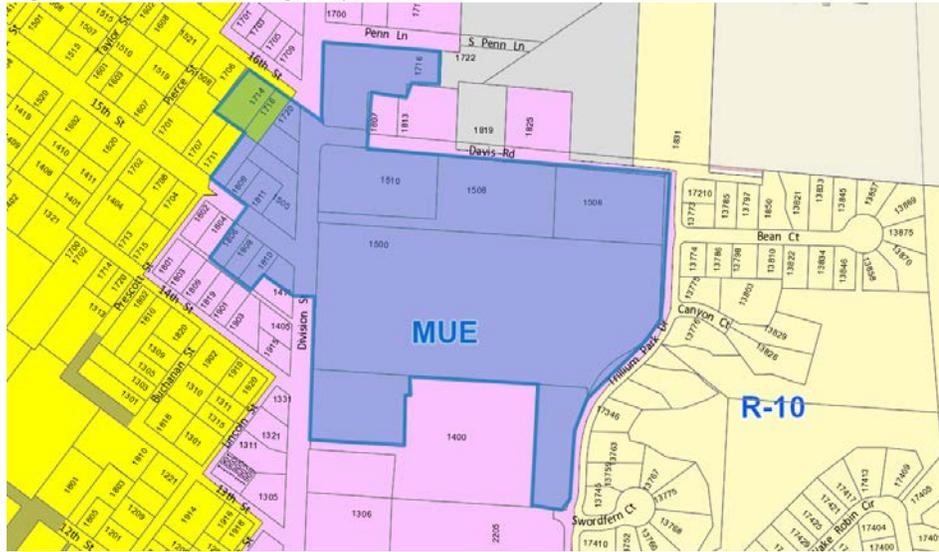
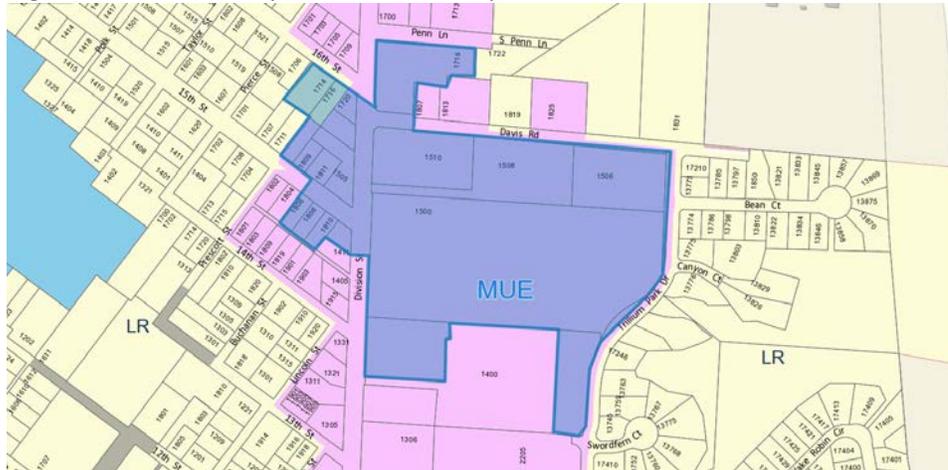


Figure 7: Current Comprehensive Plan Map



- 3. Municipal Code Standards and Requirements:** The following sections of the Oregon City Municipal Code are applicable to this land use approval:
- 12.04 - Streets, Sidewalks and Public Places
 - 12.08 - Public and Street Trees
 - 13.12 – Stormwater Management
 - 15.48 – Grading, Filling and Excavating
 - 17.12 – “R-6” Single-Family Dwelling District
 - 17.31 – “MUE” Mixed Use Employment District
 - 17.41- Tree Protection Standards
 - 17.44- Geologic Hazards Overlay District
 - 17.49 – Natural Resource Overlay District
 - 17.50 – Administrative Processes
 - 17.52 – Off-Street parking and Loading
 - 17.62 – Site Plan and Design Review
 - 17.54 – Supplemental Zoning Regulations and Exceptions
 - 17.65 - Master Plans
 - 17.68 - Zoning Changes and Amendments.
- The City Code Book is available on-line at www.orcity.org.

II. ANALYSIS AND FINDINGS:

CHAPTER 17.12 - “R-6” SINGLE-FAMILY DWELLING DISTRICT

Finding: Not Applicable. Portions of the subject site are currently within the “R-6” Single-Family Dwelling District. The applicant has proposed to change the zoning designation of the site to “MUC-2” Mixed-Use Corridor District. The standards within this criterion are not applicable.

CHAPTER 17.31 - “MUE” MIXED USE EMPLOYMENT DISTRICT

Finding: Complies as Proposed. A vast majority of the subject site is within the “MUE” Mixed Use Employment District, though the application includes a request to amend the zoning designation and Comprehensive Plan designation of 1714 and 1716 16th Street from “R-6” Single-Family Dwelling District to MUE. The zone change would accommodate the placement of a medical office building, a use permitted in OCMC 17.31.020.E.

The Master Plan amendment will result in a campus-wide reduction from the approved 104,000 square feet of net, new building area to 84,000 - 89,000 square feet. With the increase in campus size and decrease in development square footage, the floor area ratio (FAR) will decrease from 0.61 to 0.55 - 0.56; nonetheless it will continue to exceed by more than twofold the minimum FAR of 0.25 in the MUE District. Compliance with the dimensional standards of the future building will be reviewed upon submittal of a development application.

CHAPTER 17.68.020 ZONE CHANGES AND AMENDMENTS

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*

All requests for amendment or change in this title shall be referred to the Planning Commission.

Finding: Complies as Proposed. The applicant submitted this application to initiate a Zone Change and amendment to the Comprehensive Plan for the subject site in accordance with OCMC 17.68.010.c.

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

Finding: Please refer to the analysis below.

Goal 1: Citizen Involvement

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, PWF Medical Center Master Plan Modification and Comprehensive Plan/Zone Change Application 20 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.

Finding: Complies as Proposed. Chapter 17.50 of the Oregon City Municipal Code includes provisions to ensure that citizens, neighborhood groups, and affected property owners have ample opportunity for participation in this application. The applicant met with the McLoughlin Neighborhood Association prior to submitting this application and once the application was deemed complete, the City noticed the application to property owners within 300 feet of the subject site, neighborhood associations, the Citizens Involvement Committee, a general circulation newspaper, and posted the application on the City's website. In addition, the applicant posted signs on the subject site. All interested persons have the opportunity to comment in writing or in person through the public hearing process. This policy is met.

Goal 2: Land Use

Goal 2.1: Ensure that property planned for residential, commercial, office and industrial uses is used efficiently and that land is developed following principles of sustainable development.

Finding: Complies with Condition. The applicant requested a Comprehensive Plan Amendment and Zone Change from "R-6" Single-Family Dwelling District to "MUE" Mixed Use Employment District as well as an amendment to the existing Providence Willamette Falls Master Plan to include the site for use as a future medical office building. The proposal would utilize the site in a manner which is more intensive and thus efficient than the current zoning designation. This goal is met.

Goal 2.3: Corridors: Focus transit-oriented, higher intensity, mixed-use development along selected transit corridors.

Finding: Complies as Proposed. TriMet bus route 32 currently travels directly adjacent to the subject site on 16th Street and though the Providence Master Plan boundary on Division Street. The Master Plan amendment would replace two proposed medical office buildings (one of which is located further from a transit street) with a single medical office building directly adjacent to a transit street. Grant O'Connell, with TriMet submitted comments indicating that the proposal does not conflict with the agencies interests (Exhibit 7). This goal is met.

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.

Finding: Complies as Proposed. The proposed application will not dramatically change the neighborhood. The proposal would expand the boundary of the Master Plan by approximately 0.53 of an acre within the MUE district and approximately 0.5 acres currently within the “LR” Low Density Residential Development Comprehensive Plan designation and the “R-6” Single-Family Dwelling District, an extremely small percentage of the 18.52 acre Master Plan site and of the 157 acres of MUE zoned properties within the City. In addition, the application includes the consolidation of two medical office buildings totaling 50,000 square feet into a single structure which is approximately 35,000 square feet. The applicant indicated that “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” (Exhibit 2). This goal is met.

Goal 2.7: Maintain the Oregon City Comprehensive Plan Land-Use Map as the official long-range planning guide for land-use development of the city by type, density and location.

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:

Finding: Complies as Proposed. The proposal would expand the boundary of the Master Plan by approximately 0.53 of an acre within the MUE district and approximately 0.5 acres currently within the “LR” Low Density Residential Development Comprehensive Plan designation and the “R-6” Single-Family Dwelling District. As shown within this report, the amendment complies with the goals and policies of the Comprehensive Plan. In addition, the applicant indicated that “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”. This goal is met.

Goal 3: Agricultural Land: requires local governments “to preserve and maintain agricultural lands.”

Finding: Not Applicable. The subject site is within the Oregon City limits and is not designated as agricultural. This goal is not applicable.

Goal 5: Open Spaces, Scenic and Historic Areas, and Natural Resources

Finding: Not Applicable. The Oregon City Municipal Code implements Goal 5 through a variety of overlay districts. Portions of the Master Plan boundary are within the Natural Resource Overlay District as well as the Geologic Hazards Overlay District, which will be addressed upon submittal of an application for development of the site. There are no historic structures located on the subject site. This goal is not applicable.

Goal 6: Quality of Air, Water and Land Resources

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.

Finding: Complies as Proposed. This goal promotes land use patterns that reduce travel by single occupancy vehicles and promote travel by walking, bicycling, and transit to destinations including employment, shopping and education. The Providence Willamette Falls Medical Center provides a variety of employment opportunities for nearby residences and services which nearby residences would be accessible by bicycle, foot, or transit thus reducing the dependence on single occupancy vehicles. As the overall master plan building square footage will be decreased and the medical office uses will be consolidated in one location, no long term impacts on air quality or noise are anticipated. This goal is met.

Policy 6.1.4: *Encourage the maintenance and improvement of the city's tree canopy to improve air quality.*

Finding: Not Applicable. No tree removal is proposed with this application. The preservation and mitigation of trees is addressed upon submittal of Detailed Development application in Chapters 17.41, 17.44 and 17.49 of the Oregon City Municipal Code. This policy is not applicable.

Policy 6.2.1 *Prevent erosion and restrict the discharge of sediments into surface and groundwater by requiring erosion prevention measures and sediment control practices.*

Finding: Not Applicable. Future development of the site will be reviewed upon submittal of a development application, whereby standard erosion prevention and sediment control measures will be implemented during construction.

Goal 6.3: Nightlighting: *Protect the night skies above Oregon City and facilities that utilize the night sky, such as the Haggart Astronomical Observatory, while providing for nightlighting at appropriate levels to ensure safety for residents, businesses, and users of transportation facilities, to reduce light trespass onto neighboring properties, to conserve energy, and to reduce light pollution via use of night-friendly lighting.*

Finding: Not Applicable. Light pollution is addressed in Chapter 17.62.065 of the Oregon City Municipal Code upon submittal of a Detailed Development application. This policy is not applicable.

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

Finding: Not Applicable. Noise is addressed in Chapter 17.62.050.A.13 of the Oregon City Municipal Code, as well as in adopted Nuisance Ordinances. Future development of the site will be reviewed upon submittal of a development application. This policy is not applicable.

Goal 7: Natural Hazards

Finding: Not Applicable. Portions of the subject site are within the Geologic Hazards Overlay District as well as the Natural Resources Overlay District, which will be addresses upon submittal of a Detailed Development application. This goal is not applicable.

Goal 8: Parks and Recreation

Finding: Complies as Proposed. This goal is designed to provide recreational opportunities and sites for all residents of Oregon City. The development proposal will not have a significant effect on this goal. All future development of the site is subject to pay system development charges (SDC's) for parks. This goal is met.

Goal 9: Economic Development

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.

Finding: Complies as Proposed. The proposed amendment will result in the increased opportunity to provide employment and reinforce the economic role of the hospital in the community. Once development occurs, taxes will be levied for support of services and facilities. This goal is met.

Goal 10.1: *Provide for the planning, development and preservation of a variety of housing types and lot sizes.*

Finding: Complies as Proposed. Policy 10.1.3 seeks to “designate residential land for a balanced variety of densities and types of housing, such as single-family attached and detached, and a range of multi-family densities and types, including mixed-use development”. This proposal would remove two single-family homes, totaling approximately 0.5 acres, from the “R-6” Single-Family Dwelling District, which constitutes 14% of the City to the “MUE” Mixed Use Employment District which constitutes 3% of the City. The proposal would have a nominal effect on the availability of housing in Oregon City. This goal is met.

<u>Zoning Designation</u>	<u>Acres</u>	<u>Percent of the City</u>
R-10	1,567	25%
R-8	1,092	18%
R-6	890	14%
R-3.5	424	7%
R-2	262	4%
C	161	3%
CI	165	3%
GI	220	4%
HC	9	0%
I	475	8%
MUC-1	168	3%
MUC-2	45	1%
MUD	510	8%
MUE	157	3%
WFDD	30	0%

In addition, there are approximately 13,250 homes in Oregon City the loss of 5 homes is minimal (much less than 1 percent).

Goal 10.2 *Provide and maintain an adequate supply of affordable housing.*

Finding: Complies as Proposed. The removal of two homes on a total of approximately 0.5 acre would have a negligible effect on the City’s stock of affordable housing. This goal is met.

Goal 11: Public Facilities

Goal 11.1: *Serve the health, safety, education, welfare and recreational needs of all Oregon City residents through the planning and provision of adequate public facilities.*

Policy 11.1.2: *Provide public facilities and services consistent with the goals, policies and implementing measures of the Comprehensive Plan, if feasible.*

Policy 11.1.3: *Confine urban public facilities and services to the city limits except where allowed for safety and health reasons in accordance with state land-use planning goals and regulations. Facilities that serve the public will be centrally located and accessible, preferably by multiple modes of transportation.*

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 11.1.5: Design the extension or improvement of any major public facility and service to an area to complement other public facilities and services at uniform levels.

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.

Finding: Complies as Proposed. All public facilities necessary to serve this project are available at adequate levels to meet the proposed MUE zoning. The provision of public facilities and services will be consistent with the goals, policies and implementing measures of the Comprehensive Plan, and, because the site is within the city limits, the integrity of local public facility plans will be maintained. The subject site is an infill redevelopment opportunity.

Oregon City School District provides education services and has adequate levels of service available (Exhibit 4). Police and fire protection are provided by the City of Oregon City. The site will be required to pay Park SDCs (System Development Charges) for each new unit to pay for future parks to serve the area if indicated in the parks master plan.

Policy 11.2, Wastewater, 11.3, Water Distribution, 11.4, Stormwater Management, 11.5, Solid Waste, 11.6, Transportation Infrastructure, 11.7, Private Utility Operations, 11.8, Health and Education, 11.9, Fire Protection, 11.10, Police Protection, 11.11, Civic Facilities and 11.12, Library

Finding: Complies as Proposed. Other Goals contained within Section (Goal) 11 will also be satisfied and fulfilled because the proposed comprehensive plan amendment will not negatively impact any public facilities and services within the city. The goals and their associated Policies will all be fully satisfied and fulfilled without any undo or significant impact on these facilities and services as a result of the proposed comprehensive plan amendment and zone change.

Goal 12: Transportation

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 12.1.1

Maintain and enhance citywide transportation functionality by emphasizing multi-modal travel options for all types of land uses.

Policy 12.1.2

Continue to develop corridor plans for the major arterials in Oregon City, and provide for appropriate land uses in and adjacent to those corridors to optimize the land use-transportation connection.

Policy 12.1.3

Support mixed uses with higher residential densities in transportation corridors and include a consideration of financial and regulatory incentives to upgrade existing buildings and transportation systems.

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.

Goal 12.5 Safety

Develop and maintain a transportation system that is safe.

Policy 12.5.1

Identify improvements that are needed to increase the safety of the transportation system for all users.

Policy 12.5.2

Identify and implement ways to minimize conflict points between different modes of travel.

Policy 12.5.3

Improve the safety of vehicular, rail, bicycle, and pedestrian crossings.

Goal 12.6 Capacity

Develop and maintain a transportation system that has enough capacity to meet users' needs.

Policy 12.6.1

Provide a transportation system that serves existing and projected travel demand.

Policy 12.6.2

Identify transportation system improvements that mitigate existing and projected areas of congestion.

Policy 12.6.3

Ensure the adequacy of travel mode options and travel routes (parallel systems) in areas of congestion.

Policy 12.6.4

Identify and prioritize improved connectivity throughout the city street system.

Finding: Complies as Proposed. The applicant submitted a Transportation Impact Analysis (TIA) dated July 23, 2015 prepared under the direction of Julia Kuhn, P.E. of Kittleson and Associates, Inc. The analysis was performed at the worst case scenario of a 6,000 square foot medical office building, though the proposal would result in a net reduction in square footage of the Master Plan, and thus the analysis reviewed the impact of the zone change for approximately 0.5 acre. As identified in the Master Plan, each Detailed Development Plan submitted within the Master Plan will require an additional traffic study to determine the traffic impacts and identify appropriate mitigation to demonstrate compliance with the standards in the Oregon City Municipal Code.

The TIA was reviewed by a City consultant John Replinger, P.E., of Replinger and Associates. Mr. Replinger concluded that "I find that the TIA provides an adequate basis upon which to assess the impacts of the proposed rezoning. The impact of the rezoning is minor and the proposal does not have a significant impact as described in the Transportation Planning Rule. When a specific development proposal is presented, a few items not dealt with in this analysis will need to be addressed in a supplement or a new TIA" Exhibit 3).

Goal 13: Energy Conservation

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

Finding: Complies as Proposed. 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 amendment will result in efficient land use pattern by increasing the amount of development which may occur onsite. In addition, the site includes the Providence Willamette Falls Hospital which is a neighborhood activity center that may provide employment or opportunities and/or access to medical services for nearby residences.

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.

Finding: Complies as Proposed. This proposal will contribute to achieving this Section (Goal) by increasing the re-development potential within the City limits. Future development of the site will result in improvements to public utilities. This goal is met.

Goal 15: Willamette River Greenway

Finding: Not Applicable. The subject site is not within the Willamette River Greenway Overlay District. This goal is not applicable.

17.68.020.B. *That public facilities and services (water, sewer, storm drainage, transportation, schools, police and fire protection) are presently capable of supporting the uses allowed in 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.*

Finding: Complies as Proposed. The applicant has not proposed any development at this time. As demonstrated within this report, the proposed site may be served by public facilities and services.

Water: Water infrastructure exists within the streets abutting the subject properties. This infrastructure is situated such that extension and upgrading of the system can reasonably be accomplished in conjunction with subsequent development applications.

Sewer: Sanitary sewer infrastructure exists within the streets abutting the subject properties. This infrastructure is situated such that extension and upgrading of the system can reasonably be accomplished in conjunction with subsequent development applications.

Storm Drainage: Storm drainage infrastructure exists within the streets abutting the subject properties. This infrastructure is situated such that extension and upgrading of the system can reasonably be accomplished in conjunction with subsequent development applications.

Transportation: Please refer to the analysis in Policy 12 above.

Schools: This proposal was transmitted to the Oregon City School District for comment. Wes Rogers, Director of Operations submitted comments indicated that the school district has no issues with this proposal (Exhibit 4).

Police: This proposal was transmitted to the Oregon City Police Department for comment whom did not identify any concerns regarding this application.

Fire Protection: This proposal was transmitted to Clackamas Fire District for comment who did not identify any concerns regarding this application.

17.68.020.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.*

Finding: Complies with Condition. Please refer to the analysis in 17.68.020.B.

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

Finding: Not Applicable. The statewide planning goals are implemented through compliance with the Oregon City Comprehensive Plan which contains applicable goals and policies analyzed in 17.68.020.A

CHAPTER 17.65 MASTER PLANS

17.65.050.A Existing Conditions Submittal Requirements

17.65.050.A.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.

Finding: Complies as Proposed. The applicant submitted the following in Exhibit 2:

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.

17.65.050.A.1.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.*

Finding: Complies as Proposed. The application included a Vicinity Map in Figure 01 and a Proposed Site Plan: Circulation/Access & Parking in Figure 07 of Exhibit 2.

17.65.050.A.1.e. *Previous land use approvals within the General Development Plan boundary and related conditions of approval.*

Finding: Complies as Proposed. The application identified that the Providence Willamette Falls Master Plan was approved in 2012 by Planning file CP-11-01 with Phase 1 (the Division Street Parking Lot, file DP11-03) Natural Resource Overlay Exemption (file NR 11-05) and Lot Line Adjustment (file LL 11-07). Conditions of Approval associated with the approval of those concurrent applications are provided in Appendix D: Notice of Land Use Decision of Exhibit 2. The previous Master Plan and associated conditions of approval were reviewed and the proposed amendments do not conflict with any portions of the plan or necessitate further adjustments to the approved plan.

Prior to the 2012 Master Plan, PWF received a Site Plan and Design Review and Conditional Use Permit for Hospital Building Expansion with Hospital and Nursing Home Site Improvements under Planning files CU 03-03 & SP 03-19.

17.65.050.A.1.f. *Existing utilization of the site. May also reference submitted maps, diagrams or photographs.*

17.65.050.A.1.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.*

Finding: Complies as Proposed. The application included the following Figures in Appendix E of Exhibit 2:
2: 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

No cultural or historic resources that appear on the city's adopted Goal 5 inventory are located on the site.

17.65.050.A.1.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).

Finding: Complies as Proposed. The application included Figure 07: Proposed Site Plan: Circulation/Access & Parking which shows both existing and proposed conditions, and site photos in Appendix E. A Transportation Impact Analysis conducted by Kittleson and Associates was included in the application concluding "sufficient transportation and capacity is available, or can be made available, with buildout of the master plan" and that "the previously-submitted documentation remains in effect and provides the required documentation" due to the proposed reduction in square footage of full-buildout of the site Exhibit 2. The analysis was reviewed by the City and the findings may be found in the analysis of Goal 12.

17.65.050.A.1.i. Infrastructure facilities and capacity, including the following items.

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

Finding: Complies as Proposed. The applicant submitted Civil Engineering (public infrastructure) information with 2012 Master Plan which demonstrate that sufficient capacity is available, or can be made available, to accommodate the full build-out of the Master Plan.

17.65.050.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.

Finding: Complies as Proposed. The applicant indicated that no change to the duration of the original Master Plan is proposed. The duration of the 10 year Master Plan will conclude in 2021.

17.65.050.B.1.b. The proposed development boundary. May also reference submitted maps or diagrams.

Finding: Complies as Proposed. Figure 06 of the submittal includes the proposed boundary expansion (Exhibit 2).

17.65.050.B.1.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.

Finding: Complies as Proposed. Figure 06 of the application identifies that the 2015 Proposed Master Plan displays 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.

17.65.050.B.1.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.

Finding: Complies as Proposed. The application included findings analyzed within this report.

17.65.050.B.1.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.*

Finding: Complies as Proposed. The applicant indicated that proposal does not impact inventoried natural, historic, or cultural resources within the proposed development boundary. Figure 03 of the application in Exhibit 2 displays the existing Natural Resources, Hazards, and Topography. 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.

17.65.050.B.1.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 sewer, 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.*

Finding: Complies as Proposed. The applicant indicated that “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 14th 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” (Exhibit 2).

17.65.050.B.1.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.*

17.65.050.B.1.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.*

17.65.050.B.1.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.

Finding: Complies as Proposed. The application included a transportation impact study for the proposed Zone Change and amendment to the Comprehensive Plan as well as a copy of the transportation impact study from the previously approved Master Plan (Exhibit 2). Additional traffic studies will be conducted with each Detailed Development application.

17.65.050.B.1.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.

Finding: Not Applicable. No alternate development standards are proposed.

17.65.050.B.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.*

Finding: Complies as Proposed. The application included all necessary items.

17.65.050.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.*

Finding: Please refer to the analysis within Chapter 17.65 of this report.

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

Finding: Please refer to the analysis in chapter 12.04 of this report.

17.65.050.C.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.

Finding: Please refer to analyses within this report.

17.65.050.C.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.

Finding: Not Applicable. The Oregon City Municipal Code implements Goal 5 through a variety of overlay districts. Portions of the Master Plan boundary are within the Natural Resource Overlay District as well as the Geologic Hazards Overlay District, which will be addressed upon submittal of an application for development of the site. There are no historic structures located on the subject site. This goal is not applicable.

17.65.050.C.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.

Finding: Complies with Condition. The approved Master Plan includes the design of the public improvements within the Master Plan boundary and an identification of when each improvement would occur. This proposal would add additional lands into the Master Plan boundary but the design of the infrastructure improvements and timing to construct the improvements was not identified. Upon submission of a Detailed Development Plan for the adjacent property, the design and construction of the adjacent public improvements shall be analyzed and implemented prior to issuance of permits. **The applicant may comply with this criterion with the conditions of approval.**

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

Finding: Please refer to the analysis within this report.

D. Duration of General Development Plan. A general development plan shall involve a planning period of at least five years and up to twenty years. An approved general development plan shall remain in effect until development allowed by the plan has been completed through the detailed development plan process, the plan is amended or superseded, or the plan expires under its stated expiration date.

Finding: Not Applicable. The applicant did not propose to amend the timeframe of the approved 10-year master plan with an end date of 2021.

17.65.80 Amendments to Approved Plans

Finding: Complies. This application is being reviewed as a Type III amendment to the Master Plan.

17.65.090 Regulations that Apply

An applicant is entitled to rely on land use regulations in effect on the date its General Development Plan application was initially submitted, pursuant to ORS 227.178(3), as that statute may be amended from time to time. After a General Development Plan is approved, and so long as that General Development Plan is in effect, an applicant is entitled to rely on the land use regulations in effect on the date its General Development Plan application was initially submitted, as provided above, when seeking approval of detailed development plans that implement an approved General Development Plan. At its option, an applicant may request that a detailed development plan be subject to the land use regulations in effect on the date its detailed development plan is initially submitted.

Finding: Complies as Proposed. The application is subject to the code in effect at the time of submittal of this application.

CHAPTER 12.04 – STREETS, SIDEWALKS AND PUBLIC PLACES

Finding: Complies with Condition. The applicant indicated that the proposed reduction in square footage within the Master Plan will decrease vehicular trip generation due to the reduced building square footage. As discussed in the findings in Goal 12, City staff concurs with this conclusion. Each future Detailed Development Plan will be reviewed for compliance with applicable mobility standards.

The approved Master Plan specifies the design of the public improvements within the Master Plan boundary and identifies when each improvement will occur. This proposal would add additional land into the Master Plan boundary but the design of the infrastructure improvements and timing to construct the improvements was not identified. Upon submission of a Detailed Development Plan for the adjacent property, the design and construction of the adjacent public improvements shall be analyzed and implemented prior to issuance of permits.

The analysis within the previous Master Plan demonstrating compliance with Chapter 12.04 remains unchanged. Future development shall comply with Planning file CP 11-01 and any amendments within this application. **Staff has determined that it is possible, likely and reasonable that the applicant can meet this standard through the Conditions of Approval.**

CHAPTER 12.08 – PUBLIC AND STREET TREES

Finding: Complies with Condition. The approved Master Plan specifies the design of the public improvements within the Master Plan boundary and identifies when each improvement will occur. This proposal would add additional land into the Master Plan boundary but the design of the infrastructure improvements and timing to construct the improvements was not identified. Upon submission of a Detailed Development Plan for the adjacent property, the design and construction of the adjacent public improvements shall be analyzed and implemented prior to issuance of permits.

The analysis within the previous Master Plan demonstrating compliance with Chapter 12.08 remains unchanged. Future development shall comply with Planning file CP 11-01 and any amendments within this application. **Staff has determined that it is possible, likely and reasonable that the applicant can meet this standard through the Conditions of Approval.**

CHAPTER 13.12 – STORMWATER MANAGEMENT

Finding: Not Applicable. The analysis of compliance with this chapter will be analyzed upon submittal of a Detailed Development Plan application. No issues have been identified that will preclude compliance with this chapter.

CHAPTER 15.48 – GRADING, FILLING AND EXCAVATING

Finding: Not Applicable. The analysis of compliance with this chapter will be analyzed upon submittal of a Detailed Development Plan application. No issues have been identified that will preclude compliance with this chapter.

CHAPTER 17.41- TREE PROTECTION STANDARDS

Finding: Not Applicable. The analysis of compliance with this chapter will be analyzed upon submittal of a Detailed Development Plan application.

CHAPTER 17.44- GEOLOGIC HAZARDS OVERLAY DISTRICT

Finding: Not Applicable. The analysis of compliance with this chapter will be analyzed upon submittal of a Detailed Development Plan application. No issues have been identified that will preclude compliance with this chapter.

CHAPTER 17.49 – NATURAL RESOURCE OVERLAY DISTRICT

Finding: Not Applicable. The analysis of compliance with this chapter will be analyzed upon submittal of a Detailed Development Plan application.

CHAPTER 17.52 – OFF-STREET PARKING AND LOADING

Finding: Complies with Condition. Chapter 17.52.020.A identifies a minimum and maximum a number of parking stalls for the Master Plan. The application included a site plan in Figure 7 of Exhibit 2 which identified the number of parking stalls onsite. The proposed reduction of a minimum of 15,000 square feet of Master Plan at full build out would result in an equivalent parking ratio of 1.96 – 2.03 spaces/1,000 square feet based on a total projected parking supply of 874-894 spaces. Though the Oregon City Municipal Code provides opportunities for reductions in the parking onsite, the minimum requirement identified in OCMC 17.52.020 is 2 parking stalls for every 1,000 of net leasable area. Prior to issuance of permits associated with a Detailed Development Plan the applicant shall demonstrate that the Providence Willamette Falls campus associated with the Master Plan complies with the with the number of parking spaces required in OCMC 17.52.020. All other standards within this chapter will be reviewed upon submittal of a Detailed Development Plan. **Staff has determined that it is possible, likely and reasonable that the applicant can meet this standard through the Conditions of Approval.**

CHAPTER 17.62 – SITE PLAN AND DESIGN REVIEW

Finding: Not Applicable. The analysis of compliance with this chapter will be analyzed upon submittal of a Detailed Development Plan application.

CHAPTER 17.54 – SUPPLEMENTAL ZONING REGULATIONS AND EXCEPTIONS

Finding: Not Applicable. The analysis of compliance with this chapter will be analyzed upon submittal of a Detailed Development Plan application.

CHAPTER 17.50 - ADMINISTRATION AND PROCEDURES

17.50.010 Purpose.

This chapter provides the procedures by which Oregon City reviews and decides upon applications for all permits relating to the use of land authorized by ORS Chapters 92, 197 and 227. These permits include all form of land divisions, land use, limited land use and expedited land division and legislative enactments and amendments to the Oregon City comprehensive plan and Titles 16 and 17 of this code. Pursuant to ORS 227.175, any applicant may elect to consolidate applications for two or more related permits needed for a single development project. Any grading activity associated with development shall be subject to preliminary review as part of the review process for the underlying development. It is the express policy of the City that development review not be segmented into discrete parts in a manner that precludes a comprehensive review of the entire development and its cumulative impacts.

Finding: Complies as Proposed. The proposed Amendment to the Comprehensive Plan, Amendment to the Master Plan and associated Zone Change Review is subject to a Type IV discretionary approval. The applicant's narrative and the accompanying plans and supporting studies are all provided in an effort to present comprehensive evidence to support the proposed office development.

17.50.030 Summary of the City's Decision-Making Processes.

Finding: Complies as Proposed. The proposed Amendment to the Comprehensive Plan, Amendment to the Master Plan and Zone Change application is being reviewed pursuant to the Type IV process. Notice was posted onsite, online and mailed to property owners within 300 feet of the proposed development site and posted in the paper.

17.50.050 Preapplication Conference

Finding: Complies as Proposed. The applicant held a pre-application conference (file PA 15-13) on May 13, 2015. The land use application was submitted a few months later on August 11, 2015. This standard is met.

17.50.055 Neighborhood Association Meeting

Finding: Complies as Proposed. The applicant's representatives attended a meeting with the McLoughlin Neighborhood Association (MNA) on June 4, 2015 to present the proposal and seek to solicit neighborhood input (Appendix F of Exhibit 2). At the request of the MNA, PWF representatives held a follow up meeting with a subgroup of the MNA on June 30, 2015 at which time PWF presented a modified proposal which removed property on 14th Street from the proposal. This standard is met.

17.50.060 Application Requirements.

Finding: Complies as Proposed. All application materials required are submitted with this narrative.

17.50.070 Completeness Review and 120-day Rule.

Finding: Complies as Proposed. The application was deemed complete on September 14, 2015, 120 days following the completeness of the application is January 12, 2016.

17.50.080 Complete Application--Required Information.

Finding: Please refer to the analysis in 17.50.50 of this report.

17.50.090 Public Notices.

Finding: Complies as Proposed. Once the application was deemed complete, the City noticed the application to property owners within 300 feet of the subject site, neighborhood association, Citizens Involvement Council, general circulation paper, and posted the application on the City's website. In addition, the applicant posted signs on the subject site. All interested persons have the opportunity to comment in writing or in person through the public hearing process. This policy has been met. Staff provided email transmittal of the application and notice to affected agencies, the Natural Resource Committee and to all Neighborhood Associations requesting comment. The following comments have been submitted to the Planning Division:

Alex Bursheim, Early Head Start Family Coach for the Clackamas County Children's Commission submitted comments regarding the timing of the Master Plan (Exhibit 5).

Craig and Tiffany Gillespie submitted comments supporting the application (Exhibit 6).

Mike Roberts, Building Official for the City of Oregon City submitted comments regarding applicable construction regulations (Exhibit 8).

No conflicts with the approval criteria were identified in the public comments submitted.

17.50.100 Notice Posting Requirements.

Finding: Complies as Proposed. The site was posted with a sign exceeding than the minimum requirement.

CONCLUSION AND RECOMMENDATION:

Based on the analysis and findings as described above, Staff concludes that the proposed Zone Change, Comprehensive Plan Amendment and Master Plan Amendment located at Clackamas County 2-2E-32AB, Tax Lots 1201, 1900, 2000, 2100, 2200, 2300, 2400, 2500, 2800, 2900, 3000, 3100, 3900, 4000, 4100, 4200, Clackamas County 2-2E-32AA, Tax Lot 400, Clackamas County 2-2E-32AC, Tax Lots 101, 201, 7200, can meet the requirements as described in the Oregon City Municipal Code provided in this report with the conditions of approval. Therefore, the Community Development Director recommends the Planning

Commission and City Commission approve ZC 15-04, PZ 15-02 and CP 15-02 with conditions, based upon the findings and exhibits contained in this staff report.

EXHIBITS:

1. Vicinity Map
2. Applicant's Narrative and Plans
3. Comments from John Replinger of Replinger and Associates, City Consultant
4. Comments from Wes Rodgers, Director of Operations at the Oregon City School District
5. Comments from Alex Bursheim, Early Head Start Family Coach for the Clackamas County Children's Commission
6. Comments from Craig and Tiffany Gillespie
7. Comments from Grant O'Connell with TriMet
8. Comments from Mike Roberts, Building Official for the City of Oregon City
9. Staff Report for Master Plan file CP 11-01 with Excerpt Exhibits