



# CITY OF MILWAUKIE

April 29, 2020

Land Use File(s): CSU-2020-001

## NOTICE OF DECISION

This is official notice of action taken by the Milwaukie Planning Commission on April 28, 2020.

<b>Applicant(s):</b>	North Clackamas School District
<b>Location(s):</b>	8950 SE 36 <sup>th</sup> Ave
<b>Tax Lot(s):</b>	1S1E25AD 03700
<b>Application Type(s):</b>	Community Service Use (major modification)
<b>Decision:</b>	Approved with Conditions
<b>Review Criteria:</b>	Milwaukie Municipal Code (MMC) <ul style="list-style-type: none"><li>• Title 12 Streets, Sidewalks, and Public Places</li></ul> Milwaukie Zoning Ordinance: (MMC Title 19) <ul style="list-style-type: none"><li>• MMC Section 19.301 Low Density Residential Zones (incl. R-7)</li><li>• MMC Chapter 19.600 Off-Street Parking and Loading</li><li>• MMC Chapter 19.700 Public Facility Improvements</li><li>• MMC Section 19.904 Community Service Uses</li><li>• MMC Section 19.1006 Type III Review</li></ul>
<b>Neighborhood(s):</b>	Ardenwald-Johnson Creek

**Appeal period closes: 5:00 p.m., May 14, 2020**

This notice is issued in accordance with Milwaukie Municipal Code (MMC) Section 19.1006 Type III Review. The complete case file for this application is available for review by appointment between 8:00 a.m. and 5:00 p.m. on regular business days at the Planning Department, Johnson Creek Facility, 6101 SE Johnson Creek Blvd. Please contact Brett Kelter, Associate Planner, at 503-786-7657 or [kelterb@milwaukieoregon.gov](mailto:kelterb@milwaukieoregon.gov), if you wish to view this case file.

**This decision may be appealed by 5:00 p.m. on May 14, 2020, which is 15 days from the date of this decision.**<sup>1</sup> (Note: Please arrive by 4:45 p.m. for appeal payment processing.) Only persons who submitted comments or made an appearance of record at the public hearing have

<sup>1</sup> As per MMC Section 19.1010, if the 15<sup>th</sup> day falls on a weekend or legal holiday, the end of the appeal period shall be extended to the end of the next business day.

standing to appeal the decision by filing a written appeal. An appeal of this decision would be heard by the Milwaukie City Council following the procedures of MMC Section 19.1010 Appeals. This decision will become final on the date above if no appeal is filed during the appeal period. Milwaukie Planning staff can provide information regarding forms, fees, and the appeal process at 503-786-7630 or [planning@milwaukieoregon.gov](mailto:planning@milwaukieoregon.gov).

Per MMC Subsection 19.1001.7.E, this land use approval expires unless the applicant has: (1) obtained and paid for all necessary development permits and started construction within 2 years of land use approval, and (2) passed final inspection and/or obtained a certificate of occupancy within 4 years of land use approval. Extensions can be granted per MMC Section 19.908.

### **Findings in Support of Approval**

The Findings for this application are included as Exhibit 1.

### **Conditions of Approval**

1. Prior to final inspection, install signage restricting on-street parking during drop-off and pick-up hours at the following locations:
  - a. North side of Roswell St directly across from the school site's exit driveway and on the south side of Roswell St immediately east of the exit driveway.
  - b. South side of Roswell St west of the school site's entrance driveway.
  - c. North side of Wake St between the school site's exit driveway on Wake St and the existing crosswalk on the east side of the intersection with 36th Ave.

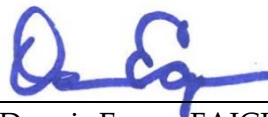
In all cases, the signage shall indicate that on-street parking is restricted during the school year, Monday through Friday from 7:00 a.m. to 9:00 a.m. and from 2:00 p.m. to 4:00 p.m.

2. Buses accessing the southern loading area must not use Wake St for queuing.

### **Other requirements**

1. Ongoing requirement: As proposed, provide a monitor during school drop-off and pick-up hours to direct vehicles accessing the northern loading area to pull forward to the nearest open spot to prevent queuing on Roswell St.
2. In conjunction with the proposed public improvements, the following must be resolved:
  - a. Submit a stormwater management plan to the City of Milwaukie Engineering Department for review and approval. The plan must be prepared in accordance with Section 2—Stormwater Design Standards of the City of Milwaukie Public Works Standards. If the stormwater management system contains underground injection control devices, submit proof of acceptance of the stormwater system design from the Department of Environmental Quality.

- b. Submit full-engineered plans for construction of all public improvements, reviewed and approved by the City of Milwaukie Engineering Department.
  - c. Obtain a right-of-way permit for construction of all public improvements.
  - d. Pay an inspection fee equal to 5.5% of the cost of all public improvements.
  - e. Provide a payment and performance bond for 100% of the cost of all public improvements.
3. Prior to commencement of any earth-disturbing activities, the applicant must obtain an erosion control permit.
  4. Development activity on the site is limited to 7:00 a.m. to 10:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. Saturday and Sunday, per MMC Subsection 8.08.070(I).



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Dennis Egner, FAICP  
Planning Director

### Exhibits

1. Findings in Support of Approval

cc: Ron Stewart, North Clackamas School District, applicant (via email)  
Rick Fuller, North Clackamas School District, applicant (via email)  
Andrew Tull, 3J Consulting, Inc., applicant's representative (via email)  
Planning Commission (via email)  
Leila Aman, Community Development Director (via email)  
Justin Gericke, City Attorney (via email)  
Steve Adams, City Engineer (via email)  
Engineering Development Review (via email)  
Samantha Vandagriff, Building Official (via email)  
Stephanie Marcinkiewicz, Inspector/Plans Examiner (via email)  
Harmony Drake, Permit Technician (via email)  
Tim Salyers, Code Compliance Coordinator (via email; for variances only)  
Mike Boumann and Matt Amos, CFD#1 (via email)  
NDA(s): Ardenwald-Johnson Creek (via email)  
Interested Persons  
Land Use File(s): CSU-2020-001  
Address File: 8950 SE 36<sup>th</sup> Ave

**EXHIBIT 1**  
**Findings in Support of Approval**  
**File #CSU-2020-001, Ardenwald Elementary loading**

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

1. The applicant, North Clackamas School District, has applied for approval of a major modification of the existing Community Service Use (CSU) related to changes to the existing loading arrangement at Ardenwald Elementary School at 8950 SE 36<sup>th</sup> Ave. This site is in the Residential R-7 Zone. The land use application file number is CSU-2020-001.
2. The applicant is seeking approval for a major modification to the existing loading arrangement at Ardenwald Elementary School. With the demolition and reconstruction of the school in 2007-08, the site was redesigned to include a large southern loop accessing Wake St for parent pick-up and drop-off and a smaller northern loop accessing Roswell St for bus staging. A condition of the accompanying land use approval (master file #CSU-07-04) limited use of the northern loop to no more than six buses at any given time. The decision also specified that a new land use approval would be required if the applicant wished to increase the number of buses or significantly reconfigure the loading arrangement.

In response to increased bus traffic at the school, administrators flip-flopped the use of the two loading loops at the start of the 2017-18 school year, rerouting buses to the southern loop (Wake St) and directing parents to the northern loop (Roswell St). This change is counter to the conditions of approval of CSU-07-04 and so constitutes a major modification to the school's existing CSU status.

3. The proposal is subject to the following provisions of the Milwaukie Municipal Code (MMC):
  - MMC Title 12 Streets, Sidewalks, and Public Places
  - MMC Section 19.301 Low Density Residential Zones (incl. R-7)
  - MMC Chapter 19.600 Off-Street Parking and Loading
  - MMC Chapter 19.700 Public Facility Improvements
  - MMC Section 19.904 Community Service Uses
  - MMC Section 19.1006 Type III Review

The application has been processed and public notice provided in accordance with MMC Section 19.1006 Type III Review. A public hearing was held on April 28, 2020, as required by law.

4. MMC Title 12 Streets, Sidewalks, and Public Places
  - a. MMC Chapter 12.16 Access Management
    - MMC Section 12.16.040 establishes requirements and standards for access (driveways), including accessway location, number, design, and size. For uses other

than single-family residential development accessing local and neighborhood streets, one accessway is allowed per frontage and new driveways must be spaced at least 100 ft from the nearest intersection. Accessways are to be designed to contain all vehicle backing movements on the site. Driveways for institutional uses are required to be at least 12 ft wide and no more than 36 ft wide.

*The subject property is bounded by local streets on two sides (36<sup>th</sup> Ave on the west and Wake St on the south), and a neighborhood route on the north (Roswell St). The site is served by two sets of one-way looped driveways, one each on Roswell St and Wake St, both of which are located approximately 200 ft from the nearest intersection at 36<sup>th</sup> Ave. The one-way driveway configuration ensures that vehicles enter the right-of-way in a forward motion. Each driveway is approximately 25 ft wide.*

*The proposed modifications include widening Roswell St just west of the western (entrance) driveway to establish on-street parking that would function as a right-turn lane during drop-off and pick-up times. This new on-street parking area would widen the entrance-driveway approach on Roswell St to approximately 33 ft. The turning radii of both Wake St driveways would be increased to allow for bus turning movements, but the widths of the existing driveway approaches would remain approximately 25 ft.*

*The proposed modifications are consistent with the applicable standards of MMC 12.16.*

b. MMC Chapter 12.24 Clear Vision at Intersections

MMC 12.24 establishes standards for maintenance of clear vision at intersections to protect the safety and welfare of the public in their use of City streets.

*As proposed, the modifications appear to conform to the applicable clear vision standards of MMC 12.24. Compliance with the applicable standards will be confirmed through the development review process.*

*The Planning Commission finds that the proposed modifications meet all applicable requirements of MMC Title 12. This standard is met.*

5. MMC Section 19.301 Low Density Residential Zones (including R-7)

The subject property is zoned Residential R-7. MMC 19.301 establishes the allowable uses and development standards for the residential R-7 zone.

a. Permitted Uses

As per MMC Table 19.301.2, community service uses (CSUs) are allowed subject to the provisions of MMC Section 19.904.

*Ardenwald Elementary School is an approved CSU on the subject property. A major modification to the school's CSU was approved in 2007, when the historic school building was demolished and replaced with the current building (master file #CSU-07-04). The 2007 approval included a condition that an increase in the number of buses serving the site at one time would require a modification to the CSU approval. The proposed modifications arise from an increase in the number of buses serving the site and represent a reversal of the approved*

*loading configuration. The proposed change is a major modification to the CSU and is subject to the provisions of MMC 19.904.*

b. Development Standards

MMC Table 19.301.4 establishes development standards for the R-7 zone. No changes are proposed to the existing building; the primary modifications are to the driveway approaches in the right-of-way. No changes are proposed to the few of the R-7 development standards are applicable.

*The minimum vegetation requirement for the R-7 zone is 30% of the lot area; however, the landscaping requirement for school CSUs is only 15%, as established in MMC Subsection 19.904.7.J. Regardless, the amount of existing landscaped area that would be impacted by the proposed modifications is negligible. Aside from the proposed widening of the entrance-driveway approach on Roswell St, the existing off-street parking and loading areas would remain unchanged. No other R-7 development standards are applicable.*

*The Planning Commission finds that the applicable development standards of the R-7 zone are met.*

*The Planning Commission finds that the proposed modifications meet the applicable standards of the underlying R-7 zone. This standard is met.*

6. MMC Chapter 19.600 Off-Street Parking and Loading

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

MMC Section 19.602 establishes the applicability of the provisions of MMC 19.600. In particular, MMC Subsection 19.602.2 requires property owners to ensure continued conformance with the standards of MMC 19.600 related to ongoing maintenance, operations, and use of off-street parking and loading areas.

*Land use master file #CSU-07-04 established the operational configuration of the site, designating the large southern loop off Wake St for parent pick-up and drop-off and the smaller northern loop of Roswell St for bus staging. The required traffic impact study concluded that the northern loop was undersized for parent pick-up and drop-off and that queuing would block the travel lanes of Roswell St if the northern loop was used for that purpose. The applicant decided to utilize the northern loop for bus staging and accepted a condition of approval that limited the number of buses on the site to no more than six buses at any one time.*

*Over time, the number of buses needing to be on the site at the same time have in fact increased. School administrators have determined that it is necessary to utilize the larger southern loop off Wake St for bus staging, and they have relocated parent pick-up and drop-off to the smaller northern loop off Roswell St. The school's action is not in conformance with the findings and conditions established by CSU-07-04 and requires a demonstration that the off-street parking and*

*loading areas continue to function effectively without negative impacts to other properties or to public facilities.*

*The proposed modifications do not include changes to any existing off-street parking spaces or the spaces provided for parent and bus loading. One additional loading space would effectively be created as a result of the proposed removal of an existing bump-out on the west side of the entrance driveway off Roswell St. No parking lot landscaping or parking stall dimensions would be affected by the proposed modifications. Likewise, the number of existing bicycle spaces (30), which well exceeds the minimum required (five spaces), will not be affected by the proposed modifications.*

*Finding 7 provides an assessment of the proposed modifications' impact on public facilities; Finding 8 addresses the proposal's consistency with the approval criteria established for CSU modifications. There are no other standards or requirements in MMC 19.600 that are applicable to the proposed modifications.*

*The Planning Commission finds that the proposed modifications remain consistent with the applicable standards of MMC 19.600. This standard is met.*

## 7. MMC Chapter 19.700 Public Facility Improvements

MMC 19.700 is intended to ensure that development, including redevelopment, provides public facilities that are safe, convenient, and adequate in rough proportion to their public facility impacts.

### a. MMC Section 19.702 Applicability

MMC 19.702 establishes the applicability of MMC 19.700, including intensifications of use that result in a projected increase in the number of vehicle trips.

*The proposed modifications are the result of an increase in the number of buses using the site at any one time. The increase in trips triggers the applicability of MMC 19.700 to the proposed modifications.*

### b. MMC Section 19.708 Transportation Facility Requirements

MMC Section 19.708 establishes requirements for transportation facilities, including street design standards. Specifically, MMC Subsection 19.708.2 provides design standards for the various street classifications, including for neighborhood and local streets. The standards provide ranges of widths for street features such as vehicle travel lanes, on-street parking, landscape strips, and sidewalks. Neighborhood streets require 10-ft travel lanes and 6-8 ft for on-street parking; local streets require 8-ft or 10-ft travel lanes and 6-8 ft for on-street parking.

*Roswell St is a neighborhood route with approximately 28 ft of paved asphalt currently provided between the existing curbs, with no restrictions to on-street parking posted on either side of the street. With two 10-ft travel lanes, only 8 ft remain for on-street parking. The applicant has proposed to widen a portion of the south side of Roswell St west of the entrance driveway by approximately 10 ft, to establish an on-street parking area that would accommodate vehicle queuing during drop-off and pick-up hours. To further minimize conflicts in the vehicle travel lanes east of the entrance driveway, the applicant has proposed to*

*install signage that would restrict on-street parking during drop-off and pick-up hours at two locations: on the north side of Roswell St directly across from the exit driveway and on the south side of Roswell St immediately east of the exit driveway.*

*Wake St is a local street with approximately 30 ft of paved asphalt currently provided between the existing curbs, with no restrictions to on-street parking posted on either side of the street. Allowing for two 8-ft travel lanes, there is technically enough width for a 7-ft-wide on-street parking area on both sides of the street. The applicant has proposed to widen the existing driveway aprons for both the entrance and exit driveways on Wake St to accommodate bus turning radii. In addition, the applicant has proposed to eliminate on-street parking on the north side of Wake St for approximately 150 ft west of the exit driveway, to provide sufficient width for safe bus turning.*

*With the proposed physical modifications to Roswell St and to the Wake St driveways, as well as with the proposed restrictions to on-street parking on both streets, the minimum dimensional standards for each street as provided in MMC Table 19.708.2 will be met.*

*The Planning Commission finds that the proposed modifications meet all applicable standards of MMC 19.700.*

8. MMC Section 19.904 Community Service Uses

MMC 19.904 provides standards and procedures for review of applications for community service uses (CSUs). These are uses that are not specifically allowed outright in most zoning districts but that address a public necessity or otherwise provide some public benefit. CSUs include public and private schools and their associated sports facilities. MMC Subsection 19.904.3 provides that the establishment of a new CSU or a major modification to a CSU shall be evaluated through a Type III review per Section 19.1006.

*The proposal to modify use of the existing loading areas in contradiction of a condition of approval represents a major modification to the school's existing CSU and so is subject to Type III review.*

MMC Subsection 19.904.4 provides the following approval criteria for establishment of a new CSU or a major modification to a CSU:

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

*The proposed modifications do not affect the applicable standards of the underlying R-7 zone or the standards that are superseded by the specific applicable standards for schools as provided in MMC Subsection 19.904.7.*

*The Planning Commission finds that this standard is met.*



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

MMC Subsection 19.904.7 establishes specific standards for schools, which are addressed as follows:

- (1) MMC Subsection 19.904.7.A requires public elementary or secondary schools to provide a site area/pupil ratio as required by state law.

*The proposed modifications do not include changes to the size of the existing school campus. This standard is not applicable.*

- (2) MMC Subsection 19.904.7.B has outdoor play area requirements for preschools, nursery schools, day-care centers, or kindergartens.

*This standard is not applicable to an elementary school.*

- (3) MMC Subsection 19.904.7.C requires walkways, both on and off the site for safe pedestrian access.

*The proposed modifications do not affect any existing walkways on or off the site. This standard is not applicable.*

- (4) MMC Subsection 19.904.7.D requires sight-obscuring fencing of 4 to 6 ft in height to separate play areas from adjacent residential uses.

*The proposed modifications do not affect any existing play areas. This standard is not applicable.*

- (5) MMC Subsection 19.904.7.E requires adequate public facilities to serve the school.

*The applicant has proposed to make some improvements to the public rights-of-way on both Roswell St and Wake St. On Roswell St, the applicant has proposed to widen a portion of the south side of the street west of the entrance driveway by approximately 10 ft. The improvement would establish an on-street parking area that would accommodate vehicle queuing during drop-off and pick-up hours. To further minimize conflicts in the vehicle travel lanes east of the Roswell St entrance driveway, the applicant has proposed to install signage that would restrict on-street parking during drop-off and pick-up hours at two locations: on the north side of Roswell St directly across from the exit driveway and on the south side of Roswell St immediately east of the exit driveway. To ensure that these on-street parking areas remain available for public use when school loading is not an issue, a condition has been established to require that the posted signage clearly indicate that on-street parking is restricted only during the school's normal loading times.*

*In addition, the applicant has proposed to widen the existing driveway aprons for both the entrance and exit driveways on Wake St to accommodate bus turning radii. Prior to submitting this land use application, the applicant also contributed funds to the City's 2019 project to rebuild Wake St, paying for the extra asphalt layer necessary to support*

*the weight of buses on that portion of the street between 36<sup>th</sup> Ave and the school driveways.*

*The applicant has also proposed to eliminate on-street parking on the north side of Wake St for approximately 150 ft west of the exit driveway, to provide sufficient width for safe bus turning. Staff notes that less than 18 ft would remain between the western edge of this new no-parking area and the existing crosswalk just east of the intersection with 36<sup>th</sup> Ave. This is not enough length for a parallel parking space (minimum 22 ft) and could result in a parked vehicle blocking the crosswalk. To ensure the safety of the existing crosswalk, a condition has been established to extend the proposed elimination of on-street parking on the north side of Wake St from the exit driveway all the way to the crosswalk (approximately 168 ft). However, to ensure that this on-street parking area remains available for public use when school loading is not an issue, the condition specifies that on-street parking is restricted only during the school's normal loading times.*

*As conditioned, the proposed modification would ensure adequate public transportation facilities to serve the school. No additional updates to other public facilities are required for the proposed development. As conditioned, this standard is met.*

- (6) MMC Subsection 19.904.7.F requires safe loading and ingress and egress on and to the site.

*As proposed, both loading areas are designed to have traffic circulate through each loop in one-way fashion, with all vehicles safely entering the public right-of-way in a forward motion. Parent vehicles would use the northern loop off Roswell St, with a newly widened area for on-street parking that would function as a queuing lane during drop-off and pick-up hours. Temporal restrictions to on-street parking near the Roswell St exit driveway would improve clear vision and significantly reduce the potential for conflict with vehicles in the travel lanes.*

*Buses would use the southern loop off Wake St. Bus turning movements would be accommodated with widened driveway aprons and the elimination of on-street parking on the north side of Wake St west of the exit driveway. Given that the southern loop could accommodate a varied number of buses of different lengths, it is not practical to set a numerical limit on buses accessing the site at one time. But a condition has been established to prohibit bus queuing on Wake St.*

*As conditioned, the proposed modifications would provide safe loading and ingress and egress on and to the site. This standard is met.*

- (7) MMC Subsection 19.904.7.G requires compliance with the parking standards in MMC 19.600.

*As discussed in Finding 6, the proposed modifications do not result in any changes to existing off-street parking on the site. This standard is met.*

- (8) MMC Subsection 19.904.7.H requires minimum yard setbacks of 20 ft.

*The proposed modifications do not involve construction of any new structures that would be subject to setback requirements. This standard is not applicable.*

- (9) MMC Subsection 19.904.7.I requires bicycle facilities which “adequately serve the site.”

*As discussed in Finding 6, the school site currently provides more than the minimum required number of bicycle parking spaces, and the proposed modifications would not affect existing bicycle parking. This standard is met.*

- (10) MMC Subsection 19.904.7.J requires a minimum landscaped area of 15%.

*The proposed modifications would remove little or no existing landscaping on the site, which provides nearly 60% landscaped area. The site would continue to provide well over the minimum 15% landscaping required. This standard is met.*

*As conditioned, the Planning Commission finds that the proposed modifications meet the applicable standards of MMC 19.904.7.*

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

*The hours and levels of operation of the proposed new loading arrangement would be similar to those of the pre-existing loading arrangement, which previous land use reviews have found to be compatible with surrounding uses. Although these findings do not establish a new limit on the number of buses accessing the site at one time, the proposed modifications do not increase the school’s capacity or the intensity of use.*

*As proposed, the Planning Commission finds that this standard is met.*

- d. The public benefits of the proposed use are greater than the negative impacts, if any, on the neighborhood.

*The proposed modifications would allow the school to have more buses serve the site and make better use of the larger southern loading area, which was originally designed to support bus traffic. The proposed modifications would also increase the capacity of the smaller northern loading area without negatively impacting traffic on Roswell St, by providing more space for on-street queuing near the entrance driveway and eliminating potential conflicts with on-street parking near the exit driveway. The applicant has contributed funds to the City’s recent project to resurface Wake St, with additional asphalt on the section between 36<sup>th</sup> Ave and the school driveways to account for the added weight of buses that would use that portion of the street more regularly.*

*As proposed, on-street parking would be eliminated on the north side of Wake St just west of the exit driveway for a length of approximately 150 ft. No on-street spaces would be affected on the southern side of Wake St. As discussed in Finding 8-b-5, above, a condition has been established to extend the restriction of on-street parking on the north side of Wake St all the way to the crosswalk (approximately 168 ft). This represents the equivalent of nine on-street*

*spaces that are currently available to the public, particularly to residents and visitors at nearby residential properties. To ensure that this on-street parking area remains available for public use when school loading is not an issue, the condition specifies that on-street parking is restricted only during the school's normal loading times. This restriction, along with the proposed modifications to the Wake St driveway aprons and the condition established to prohibit bus queuing on Wake St (discussed in Finding 8-b-6, above), would ensure that school-related traffic would not create conflicts with on-street travel on Wake St.*

*As conditioned, the overall public benefits of the proposed modifications are greater than any negative impacts on the neighborhood.*

*As conditioned, the Planning Commission finds that this standard is met.*

- e. The location is appropriate for the type of use proposed.

*Previous land use reviews have found the subject property to be appropriate for the approved elementary school use. The proposed modification to the loading arrangement that was originally approved with CSU-07-04 would result in the greater number of trips (parent vehicles) using Roswell St, which as a neighborhood route has a higher functional classification than Wake St, a local street. The larger loop off Wake St would better accommodate bus loading on the school site and would result in fewer overall vehicle trips on the lower classification local street. And the street surface on Wake St has been fortified to accommodate the heavier weight of buses.*

*As proposed, the Planning Commission finds that this standard is met.*

*The Planning Commission finds that, as conditioned, the proposed modifications meet the approval criteria of MMC 19.904.4 as a major modification to the school as a CSU.*

9. The application was referred to the following departments and agencies on February 11, 2020:

- Milwaukie Building Department
- Milwaukie Engineering Department
- Milwaukie Public Works Department
- Milwaukie Police Department
- Milwaukie City Attorney
- Ardenwald-Johnson Creek Neighborhood District Association (NDA), Chairperson and Land Use Committee (LUC)
- Clackamas Fire District #1 (CFD#1)

In addition, public notice of the application with an invitation to comment was sent on March 4, 2020, to property owners and residents within 300 ft of the subject property.

The comments received are summarized as follows:

- **Matt Amos, Fire Inspector, CFD#1:** Based on the site design, there are no negative impacts to fire department access and water supply. No further comments on the proposal.