



CITY OF MILWAUKIE

September 15, 2022

Land Use File(s): VR-2022-007; DEV-2022-002

NOTICE OF DECISION

This is official notice of action taken by the Milwaukie Planning Commission on September 13, 2022.

Traducciones de este documento e información sobre este proyecto están disponibles en español. Para solicitar información o preguntar en español, favor de email espanol@milwaukieoregon.gov.

Applicant(s):	Alpine Foods (Greg Carlston, representative)
Location(s):	9696 SE Omark Dr
Tax Lot(s):	1S1E25CB00200
Application Type(s):	Variance Request
Decision:	Approved with Conditions
Review Criteria:	Milwaukie Zoning Ordinance: <ul style="list-style-type: none">• MMC Chapter 12.16 Access Management• MMC Section 19.312 North Milwaukie Innovation Area, North Milwaukie Employment Zone (NME)• MMC 19.600 Off Street Parking and Loading• MMC Chapter 19.700 Public Facility Improvements• MMC 19.906 Development Review• MMC Section 19.911 Variances• MMC Section 19.1006 Type III Review
Neighborhood(s):	Not Applicable (North Milwaukie Industrial Area)

Appeal period closes: 5:00 p.m., September 30, 2022

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 Kelver, Senior Planner, at 503-786-7657 or kelperb@milwaukieoregon.gov, if you wish to view this case file.

This decision may be appealed by 5:00 p.m. on September 30th, 2022, which is 15 days from the date of this decision.¹ (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 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.

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. As per Finding 6-c, plant trees in the perimeter landscaping area along Omark Drive at a minimum of one tree per 30 lineal ft. As required by Milwaukie Municipal Code (MMC) Subsection 19.606.2.B, trees must be species that will provide a minimum 20-ft-diameter shade canopy within 10 years of planting (based on expected growth).
2. As per Finding 6-e, establish a minimum of seven bicycle parking spaces on the site that address the applicable standards of MMC Section 19.609.
3. As per Finding 6-f, establish a minimum of seven carpool/vanpool parking spaces on the site that address the applicable standards of MMC Section 19.610.

Other Requirements

1. Prior to building permit issuance, the following must be resolved:
 - a. Submit a storm water 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. Private properties may only connect to public storm systems if percolation tests show that infiltration cannot be obtained on site. In the event the storm

¹ As per MMC Section 19.1010, if the 15th 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.

management system contains underground injection control devices, submit proof of acceptance of the storm system design from the Department of Environmental Quality.

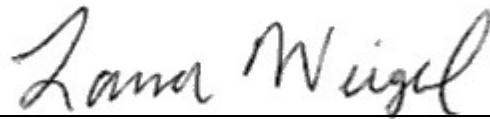
- b. Obtain a right-of-way permit for construction of all landscaping and driveway/accessway improvements in the right-of-way.

2. Clear Vision (MMC Chapter 12.24)

Clear vision areas must be maintained at all driveways and accessways and on the corners of all property adjacent to an intersection. Remove all signs, structures, or vegetation more than 3 ft in height located in “vision clearance areas” at intersections of streets, driveways, and alleys fronting the proposed development.

Decision

- Approved
 Approved with Conditions
 Denied



Laura Weigel, AICP
Planning Manager

Exhibits

1. Findings in Support of Approval

cc: Greg Carlston, Alpine Foods, applicant (via email)
Kevin Watkins, representative (via email)
Planning Commission (via email)
Joseph Briglio, Community Development Director (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 Enforcement Coordinator (via email)
Alex McGladrey, CFD#1 (via email)
Interested Persons
Land Use File(s): VR-2022-007
Address File: 9696 SE Omark Dr

ATTACHMENT 1
Recommended Findings in Support of Approval
Primary File #VR-2022-007, Height Variance for Alpine Foods Warehouse

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, Greg Carlston on behalf of Alpine Foods, has applied for approval of a height variance for a new warehouse at 9696 SE Omark Dr. The purpose of the request is to allow the new building to exceed the maximum allowed building height ft by 11 ft (from 45 ft to 56 ft). As new construction of over 1,000 sq ft within the North Milwaukie Innovation Area, the proposed development also requires development review. The primary land use file number for the variance request is VR-2022-007, with development review file number DEV-2022-002.
2. The subject property forms a majority of the eastern half of the Omark Drive cul-de-sac in the north Milwaukie industrial area. The property is comprised of a large portion of Lot 6 from the underlying Omark Industrial Park subdivision (platted in 1958) and is currently developed with two large warehouse structures and adjacent maneuvering/loading areas. The site is in the North Milwaukie Employment (NME) zone, as is the immediate surrounding area. The site is separated from the nearby moderate density residential (R-MD) area to the east by light rail and heavy rail lines.
3. The proposal is subject to the following provisions of the Milwaukie Municipal Code (MMC):
 - MMC Chapter 12.16 Access Management
 - MMC Section 19.312 North Milwaukie Innovation Area, North Milwaukie Employment (NME) zone
 - MMC Chapter 19.600 Off-Street Parking and Loading
 - MMC Chapter 19.700 Public Facility Improvements
 - MMC Section 19.906 Development Review
 - MMC Section 19.911 Variances
 - MMC Section 19.1006 Type III Review

The application has been processed and public notice provided in accordance with MMC Section 19.1006 Type III Review. A public hearing was held by the Planning Commission on September 13, 2022, as required by law.

4. MMC Chapter 12.16 Access Management

MMC 12.16 regulates access from private property onto public streets, with specific requirements and standards provided in MMC Section 12.16.040.

MMC Subsection 12.16.040.A states that access to private property is permitted with the use of driveway curb cuts, that driveways must meet all applicable guidelines of the Americans with Disabilities Act (ADA), and that the driveway approaches must be improved to meet the requirements of the City's Public Works Standards.

MMC Subsection 12.16.040.C governs the location of accessways (driveways), requiring a minimum of 10 ft from the side property line in nonresidential districts.

MMC Subsection 12.16.040.F.7 states that industrial uses must have a minimum driveway apron width of 24 ft and a maximum width of 45 ft. As per MMC Subsection 12.16.040.F.8, the driveway width for commercial and industrial uses may be increased if the City Engineer determines that more than two lanes are required.

The existing driveway approach on Omark Drive is over 100 ft wide. The applicant has proposed to reduce the approach width to 45 ft. The driveway is located in the middle of the property's Omark Drive frontage and is well over 10 ft from side property lines.

The Planning Commission finds that the applicable standards of this chapter are met.

5. MMC Section 19.312 North Milwaukie Innovation Area, North Milwaukie Employment (NME) Zone

MMC 19.312 establishes standards for the North Milwaukie Innovation Area, including the North Milwaukie Employment (NME) zone. As noted in MMC Table 19.312.2, wholesale trade, warehousing, and distribution are outright permitted uses in the NME zone. Development standards are provided in MMC Subsections 19.312.5 and 19.312.6. The applicable standards are addressed as described in Table 5 below.

Table 5 Applicable NME Development Standards			
Standard	NME Requirement	Existing Warehouse	Proposed New Warehouse
Floor Area Ratio	0.5:1 (min) 3:1 (max)	1.59:1 (221,840 sq ft : 363,726 sq ft)	1.63:1 (228,397 sq ft : 363,726 sq ft)
Building Height	25 ft (min) 45 ft (max) ¹	26.5 ft	56 ft ²
Front Yard	0 ft (min) 30 ft (max on key streets)	0 ft	0 ft
Side Yard	0 ft	0 ft	5 ft
Rear Yard	0 ft	0 ft	0 ft
Maximum lot coverage	85%	61% (221,840 sq ft)	62.6% (228,397 sq ft)
Minimum landscaping	15%	1.3% (4,860 sq ft)	3% (11,118 sq ft)
Off-street parking	0.3 spaces per 1,000 sq ft (min for warehousing) 2 spaces per 1,000 sq ft (min for office)	15 spaces	60 spaces (45 new spaces)

	224,673 sq ft warehousing; 3,273 sq ft office = 73 total spaces (min)		
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¹ A height bonus of up to 45 ft is available for green buildings certified per the provisions of MMC Section 19.510.
² The applicant’s request for a height variance is discussed in Finding 9.

As proposed, and with approval of the variance discussed in Finding 9, the Planning Commission finds that the applicable NME zone standards of MMC 19.312 are 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.

a. MMC Section 19.602 Applicability

MMC 19.602 establishes the applicability of the provisions of MMC 19.600, and MMC Subsection 19.602.3 establishes thresholds for full compliance with the standards of MMC 19.600. Development that results in an increase of less than 100% of the existing floor area and/or structure footprint must be brought closer into conformance with the standards of MMC 19.600. However, MMC Subsection 19.602.5 limits the cost of materials for any required improvements to 10% of the development permit value.

The existing development on the subject property includes 224,673 sq ft of warehouse. The proposed development involves demolition of an existing 49,000-sq-ft warehouse building and construction of a new 53,360-sq-ft building, including 3,273 sq ft of office space. The proposed development will increase the floor area and footprint but by less than 100%.

The Planning Commission finds that the provisions of MMC 19.600 are applicable to the proposed development and that the site must be brought closer into conformance within the limits established in MMC 19.602.5.

b. MMC Section 19.605 Vehicle Parking Quantity Requirements

MMC 19.605 establishes standards to ensure that development provides adequate vehicle parking (off-street) based on estimated parking demand.

MMC Subsection 19.605.1 Minimum and Maximum Requirements

MMC Table 19.605.1 provides minimum and maximum quantity requirements for multifamily dwellings containing three or more dwelling units. For warehouse uses 150,000 sq ft or greater, a minimum of 0.3 spaces per 1,000 sq ft is required, with a maximum of 0.4 spaces per 1,000 sq ft allowed. For general office uses, a minimum of 2 spaces per 1,000 sq ft are required, with a maximum of 3.4 spaces per 1,000 sq ft allowed.

The existing development includes a total of 224,673 sq ft of warehouse, with 3,273 sq ft of office, requiring a total minimum of 73 parking spaces. The site currently provides only 15

spaces. The site is large but is constrained by the need to provide maneuvering areas for trucks accessing three loading dock areas arranged in a horseshoe shape. The applicant has proposed to add 28 additional parking spaces in the center of the horseshoe area, two ADA spaces near the new office area, and 15 more spaces in the southwest corner of the property, bringing the total number of spaces to 60. Given the need to maintain adequate space for maneuvering and loading, there is no practical opportunity to add more spaces.

As proposed, the Planning Commission finds that the proposed development brings the site sufficiently closer to conformance with the required parking quantity standard.

c. MMC Section 19.606 Parking Area Design and Landscaping

MMC 19.606 establishes standards for parking area design and landscaping, to ensure that off-street parking areas are safe, environmentally sound, and aesthetically pleasing, and that they have efficient circulation.

MMC Subsection 19.606.1 establishes dimensional standards for required off-street parking spaces and drive aisles. For 90°-angle spaces, the minimum width is 9 ft and minimum depth is 18 ft, with 22-ft drive aisles; MMC Table 19.606.1 establishes dimensional requirements for various angles of spaces. MMC Subsection 19.606.2 provides standards for perimeter and interior landscaping areas, including minimum widths and planting requirements. MMC Subsection 19.606.3 establishes various design standards, including requirements related to paving and striping, wheel stops, pedestrian access, internal circulation, and lighting.

The site currently provides 15 spaces, which are wedged in an angled area between two adjacent buildings. There is no interior landscaping. The drive aisle width is inconsistent, with a narrow and sparsely planted perimeter landscape strip along the site's Omark Drive frontage. The applicant has proposed to provide a total of 45 additional spaces and to refresh the existing perimeter landscaping and provide expanded landscaping areas at the driveway entrance. A condition has been established to ensure that trees are planted within the perimeter landscaping area at the minimum 30-lineal-ft spacing as required by MMC Subsection 19.606.2.C.2. Given the scale of the proposed warehouse improvement, the required tree planting will not exceed the 10% limit on improvements established in MMC 19.602.5.B.

As conditioned, the Planning Commission finds that the applicable standards of MMC 19.606 are met.

d. MMC Section 19.608 Loading

MMC 19.608 establishes standards for off-street loading areas and empowers the Planning Manager to determine whether loading spaces are required. Where loading spaces are required, spaces must be at least 35 ft long and 10 ft wide, with a height clearance of 13 ft, and located where not a hindrance to drive aisles or walkways.

The subject property is currently utilized for warehousing and distribution, with three loading dock areas and 24 proposed loading spaces over 50 ft long and of sufficient width and height to accommodate large tractor trailers.

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

e. MMC Section 19.609 Bicycle Parking

MMC 19.609 establishes standards for bicycle parking. Unless otherwise specified, the number of bicycle parking spaces is at least 10% of the minimum required vehicle parking for the use. MMC Subsection 19.609.3.A requires that each bicycle parking space have minimum dimensions of 2 ft by 6 ft, with 5-ft-wide aisles for maneuvering. MMC Subsection 19.609.4 requires bike racks to be located within 50 ft of a main building entrance.

As noted in Finding 6-b, a minimum of 73 vehicle parking spaces are required, which results in a minimum of seven required bicycle parking spaces. Currently, there are no bicycle parking spaces on site. A condition has been established to ensure that bicycle parking for the site meets the minimum standards for quantity, dimension, and the other applicable aspects of MMC 19.609. Given the scale of the proposed warehouse improvement, the required bicycle parking improvements will not exceed the 10% limit on improvements established in MMC 19.602.5.B.

As conditioned, the Planning Commission finds that the applicable standards of MMC 19.609 are met.

f. MMC Section 19.610 Carpool and Vanpool Parking

MMC 19.610 establishes carpool parking standards for new industrial, institutional, and commercial development with 20 or more required parking spaces. The number of carpool/vanpool parking spaces is at least 10% of the minimum required vehicle parking for the use. Parking for carpools/vanpools must be located closer to the main entrances of the building than other employee or student parking, except ADA spaces. Carpool/vanpool spaces must be clearly designated with signs or pavement markings for use only by carpools/vanpools.

As noted in Finding 6-b, a minimum of 73 vehicle parking spaces are required, which results in a minimum of seven required carpool/vanpool parking spaces. Currently, there are no carpool/vanpool spaces on site. A condition has been established to ensure that carpool/vanpool parking for the site meets the minimum standards of MMC 19.610. Given the scale of the proposed warehouse improvement, the required carpool/vanpool parking improvements will not exceed the 10% limit on improvements established in MMC 19.602.5.B.

As conditioned, the Planning Commission finds that the applicable standards of MMC 19.610 are met.

As proposed and conditioned, the Planning Commission finds that the applicable standards of MMC 19.600 are met.

7. MMC Chapter 19.700 Public Facility Improvements

MMC 19.700 is intended to ensure that development, including expansions, 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 a new dwelling unit, any increase in gross floor area, land divisions, new construction, and modification or expansion of an existing structure or a change or intensification in use that result in any projected increase in vehicle trips.

The applicant is proposing to demolish an existing 49,000-sq-ft warehouse building and replace it with a new 53,360-sq-ft warehouse building. The proposed new construction triggers the requirements of MMC 19.700.

This standard is met.

b. MMC Section 19.703 Review Process

MMC 19.703 establishes the review process for development that is subject to MMC 19.700, including requiring a preapplication conference, establishing the type of application required, and providing approval criteria.

The applicant had a preapplication conference with City staff on June 30, 2022, prior to application submittal. The proposal's compliance with MMC 19.700 has been evaluated with these findings, so a separate Transportation Facilities Review application is not required.

This standard is met.

c. MMC Section 19.704 Transportation Impact Evaluation

MMC 19.704 establishes the process and requirements for evaluating development impacts on the surrounding transportation system, including determining when a formal Transportation Impact Study (TIS) is necessary and what mitigation measures will be required.

The proposed development will not generate a significant number of new trips and the City Engineer has determined that a TIS is not required.

This standard is met.

d. MMC Section 19.705 Rough Proportionality

MMC 19.705 requires that transportation impacts of the proposed development be mitigated in proportion to its potential impacts.

The subject property takes access off Omark Drive. The proposed development will not generate a significant number of new trips and will not result in transportation impacts or the need for updated transportation facilities on Omark Drive. Any requirement for street improvements or a fee in lieu of construction for the proposed development would not be proportional to impacts.

This standard is met.

e. MMC Section 19.707 Agency Notification and Coordinated Review

MMC 19.707 establishes provisions for coordinating land use application review with other agencies that may have some interest in a project that is in proximity to facilities they manage.

The application was referred to the Oregon Department of Transportation (ODOT), including the ODOT Rail division, and to TriMet for review and comment.

This standard is met.

f. MMC Section 19.708 Transportation Facility Requirements

MMC 19.708 establishes the City's requirements and standards for improvements to public streets, including pedestrian, bicycle, and transit facilities. All development subject to MMC 19.700 must comply with the access management standards of MMC Chapter 12.16 and the clear vision standards of MMC Chapter 12.24.

As noted in Finding 7-d, any requirement for street improvements would not be proportional to the impacts of the proposed development. The applicant has proposed to reduce the Omark Drive driveway approach width to 45 ft. The proposed development is subject to the applicable access management standards of MMC 12.16 and the clear vision standards of MMC 12.24.

This standard is met.

As proposed, the Planning Commission finds that the applicable standards of MMC 19.700 are met.

8. MMC Section 19.906 Development Review

The purpose of MMC 19.906 is to ensure compliance with the standards and provisions of the City's land use regulations through an efficient review process that effectively coordinates the City's land use and development permit review functions. As per MMC Subsection 19.906.2.B, new construction of over 1,000 sq ft in the North Milwaukie Innovation Area is subject to Type II development review. MMC Section 19.906.4 establishes approval criteria for development review, which is essentially compliance with applicable standards of MMC Chapters 19.300, 19.400, 19.500, 19.600, and 19.700 as well as with any applicable conditions of approval from prior land use approvals.

The proposed development involves demolition of a 49,000-sq-ft warehouse building and replacement with a new 53,360-sq-ft warehouse building and so is subject to Type II review in conjunction with the requested variance. These findings address the proposal's compliance with the applicable standards of MMC Chapters 19.300-19.700.

As proposed and conditioned and as addressed throughout these findings, the Planning Commission finds that the applicable standards of MMC 19.906 are met.

9. MMC Section 19.911 Variances

a. MMC Subsection 19.911.2 Applicability

MMC 19.911.2 establishes applicability standards for variance requests.

Variances may be requested to any standard of MMC Title 19, provided the request is not specifically listed as ineligible in MMC Subsection 19.911.2.B. Ineligible variances include requests that result in a change of a review type, change or omission of a procedural step, change to a definition, increase in density, allowance of a building code violation, allowance of a use that is not allowed in the base zone, or the elimination of restrictions on uses or development that contain the word “prohibited.”

The applicant has requested a variance to the maximum allowed building height in the NME zone, as established in MMC Table 19.312.5.B.2.

The requested variance meets the eligibility requirements.

b. MMC Subsection 19.911.3 Review Process

MMC 19.911.3 establishes review processes for different types of variances. MMC Subsection 19.911.3.B establishes the Type II review process for limited variations to certain numerical standards, not including building height. MMC Subsection 19.911.3.C establishes the Type III review process for larger or more complex variations to standards that require additional discretion and warrant a public hearing.

The applicant has proposed to exceed the maximum building height allowed in the NME zone (45 ft) by 11 ft, for a total proposed height of 56 ft. The requested increase is subject to the Type III review process.

c. MMC Subsection 19.911.4 Approval Criteria

MMC 19.911.4 establishes approval criteria for variance requests. For Type III variances, MMC Subsection 19.911.4.B.1 provides approval criteria related to discretionary relief and MMC Subsection 19.911.4.B.2 provides approval criteria related to economic hardship.

The applicant has elected to address the discretionary relief criteria for the requested variance.

- (1) The applicant’s alternatives analysis provides, at a minimum, an analysis of the impacts and benefits of the variance proposal as compared to the baseline code requirements.

MMC Subsection 19.312.6.A allows a height bonus of up to 45 ft for buildings that receive green certification in accordance with the provisions of MMC Section 19.510. However, the applicant has indicated that green building certification for the proposed cold-storage warehouse is not practical for this type of construction and building function. In particular, the need to maintain a solid vapor barrier around the building envelope eliminates a green roof as an option. And there are no suitable green building materials available on the market to create a sufficient vapor barrier as well as insulated systems for walls, roof, and ground warming. Although the building itself, as well as the refrigeration equipment and other systems, will be very energy efficient, achieving an official green building certification for this cold-storage warehouse is not a viable option.

The requested variance would increase the building height by 11 ft, from 45 ft to 56 ft. The project area is on the interior of the surrounding industrial area and is not adjacent to a residential area. The increased height will not result in any negative impacts to surrounding properties but would allow the existing warehouse activity to operate more efficiently within the proposed building footprint.

The Planning Commission finds that the analysis of the impacts and benefits of the requested variance compared to the baseline requirements is acceptable. This criterion is met.

- (2) The proposed variance is determined to be both reasonable and appropriate, and it meets one or more of the following criteria:
- The proposed variance avoids or minimizes impacts to surrounding properties.
 - The proposed variance has desirable public benefits.
 - The proposed variance responds to the existing built or natural environment in a creative and sensitive manner.
 - The proposed variance would allow the development to preserve a priority tree or trees, or provide more opportunity to plant new trees to achieve 40% canopy, as required by Chapter 16.32.

As noted above, the acquisition of green building certification (which would allow up to 45 ft of additional height without a variance) is not practical for the proposed cold-storage warehouse. The applicant is proposing to exceed the base maximum height by only 11 ft and not the full 45 ft that would be allowed with a green certification. The project area is in the middle of an existing industrial area and the increased height will not negatively impact any adjacent properties. The increased height will allow the applicant to significantly increase the capacity of the existing warehouse operation within nearly the same footprint as the existing warehouse to be demolished.

The Planning Commission finds that the requested variance is reasonable and appropriate and that it meets one or more of the criteria provided in MMC Subsection 19.911.B.1.b.

- (3) Impacts from the proposed variance will be mitigated to the extent practicable.

As noted above, the requested variance will not result in any negative impacts to surrounding properties. The project area is in the middle of an existing industrial area and is not immediately adjacent to any residential properties.

The Planning Commission finds that the requested variance would result in little to no impact to surrounding properties or access to the trail and that no conditions requiring specific mitigation are necessary. This criterion is met.

As proposed, the Planning Commission finds that the requested variance meets the approval criteria established in MMC 19.911.4.B.1 for Type III variances seeking discretionary relief.

The Planning Commission finds that the requested variance is allowable as per the applicable standards of MMC 19.911.

10. The application was referred to the following departments and agencies on August 4, 2022:
- Milwaukie Community Development Department
 - Milwaukie Engineering Department
 - Milwaukie Building Department
 - Milwaukie Public Works Department (including Natural Resources division)
 - City Attorney
 - Clackamas Fire District #1 (CFD #1)
 - Oregon Department of Transportation (ODOT), including ODOT Rail Division
 - TriMet
 - NW Natural

In addition, public notice was provided as required by MMC Subsection 19.1006.3 on August 24, 2022. No responses were received from either the referral or public notice mailing.