



January 11, 2019

Brett Kelter, Associate Planner
City of Milwaukie Community Development
6101 SE Johnson Creek Blvd.
Milwaukie, OR 97206

Subject: Completeness Items for CU-2018-003

Dear Brett,

We are providing this letter and attached materials in response to your incompleteness letter dated January 4, 2019 for a proposed senior living facility at 13333 SE Rusk Road. The incompleteness items identified in your letter are listed below along with a response indicating how they have been addressed.

1. MMC Subsection 19.504.9 On-Site Walkways and Circulation

A walkway into the site is required for every 300 ft of street frontage (MMC Subsection 19.504.9.B). As noted in the narrative, the frontage on Kellogg Creek Dr exceeds 600 ft, so 2 walkway connections into the site are required. The site plan shows 1 connection at the driveway onto Kellogg Creek Dr, and the narrative indicates that it is not appropriate to provide a second connection. That may be the case, but a formal variance request is required if relief is sought from the standard. The same is true for the limited site frontage on Rusk Rd (approximately 64 ft, which requires 1 walkway connection).

Response: The site plan has been revised to show an additional connection into the site from Kellogg Creek Drive, located at the eastern edge of the site next to the church property. For the limited site frontage on SE Rusk Road, the applicant is requesting a variance to the standard. The narrative has been updated to include the variance request and address the applicable variance criteria.

2. MMC Section 19.609 Bicycle Parking

The requirement for bicycle parking applies to community service uses, which includes the proposed memory care units. While it may be true that bicycle parking is not necessary for memory care residents themselves, the spirit of the requirement extends to employees and visitors. If bicycle parking will not be provided, a variance request is required. If the applicant wishes to make the case that bicycle parking should be required at a level less than 10% of the vehicle parking spaces, that could be addressed in the applicant's requested parking determination, as per the procedure outlined in MMC Subsection 19.605.2.

Response: The site plan has been updated to include 14 bicycle parking spaces (which is 10 percent of the 139 vehicle parking spaces on the site). The narrative has been updated to reflect this change and address applicable bicycle parking standards.

3. MMC Section 19.904 Community Service Uses (CSUs)

a. MMC Subsection 19.904.5.C Minor Modifications

The proposed boundary change to place the Turning Point Church on a separate lot significantly reduces the amount of landscaping on the church site. It is not clear from the application materials whether the proposed change will reduce the minimum required landscaping below the level allowed for institutional and religious CSUs (15% of the site area). The materials should be revised to address this issue and include a variance request if necessary.

Response: An attachment is provided with this submittal to demonstrate the amount of vegetated area that will remain on the church property. As shown in Attachment 1, approximately 25 percent of the church site will be vegetated, which exceeds the requirement.

b. MMC Subsection 19.904.8 Specific Standards for Nursing or Convalescent Homes

The facility is subject to the standard established in MMC Subsection 19.904.8.B requiring access onto an arterial or collector street. As the narrative has noted that the facility proposes to access onto a local street (Kellogg Creek Dr), a variance request is required for relief from this standard.

Response: Connection to an arterial or collector street is not feasible; therefore, the applicant requests a variance to this standard. The narrative has been updated to include the variance request and address the applicable variance criteria.

4. Title 18 Flood Hazard Regulations

The narrative and application materials indicate that the actual location of the 100-year floodplain is different than what is shown on the relevant FEMA map. The narrative should be expanded to address Title 18 in the Milwaukie Municipal Code at least enough to explain whether and/or when the applicant proposes to officially revise the FEMA map and otherwise address the floodplain shown on the site.

Response: The narrative has been updated to include Title 18.

5. Stormwater Management

- a. *Remove the reference to WES sizing methodology in the preliminary drainage report. The basin sizing provided in Figure 2 of the Proposed Basin Delineation plan does not match the basin sizes used in the Presumptive Approach Calculator. Proposed facilities must be designed to relevant on-site basin sizes. Please revise as needed.*
- b. *Basin A appears to drain to 2 separate facilities. Please revise to have separate sub-basins or connected facilities.*

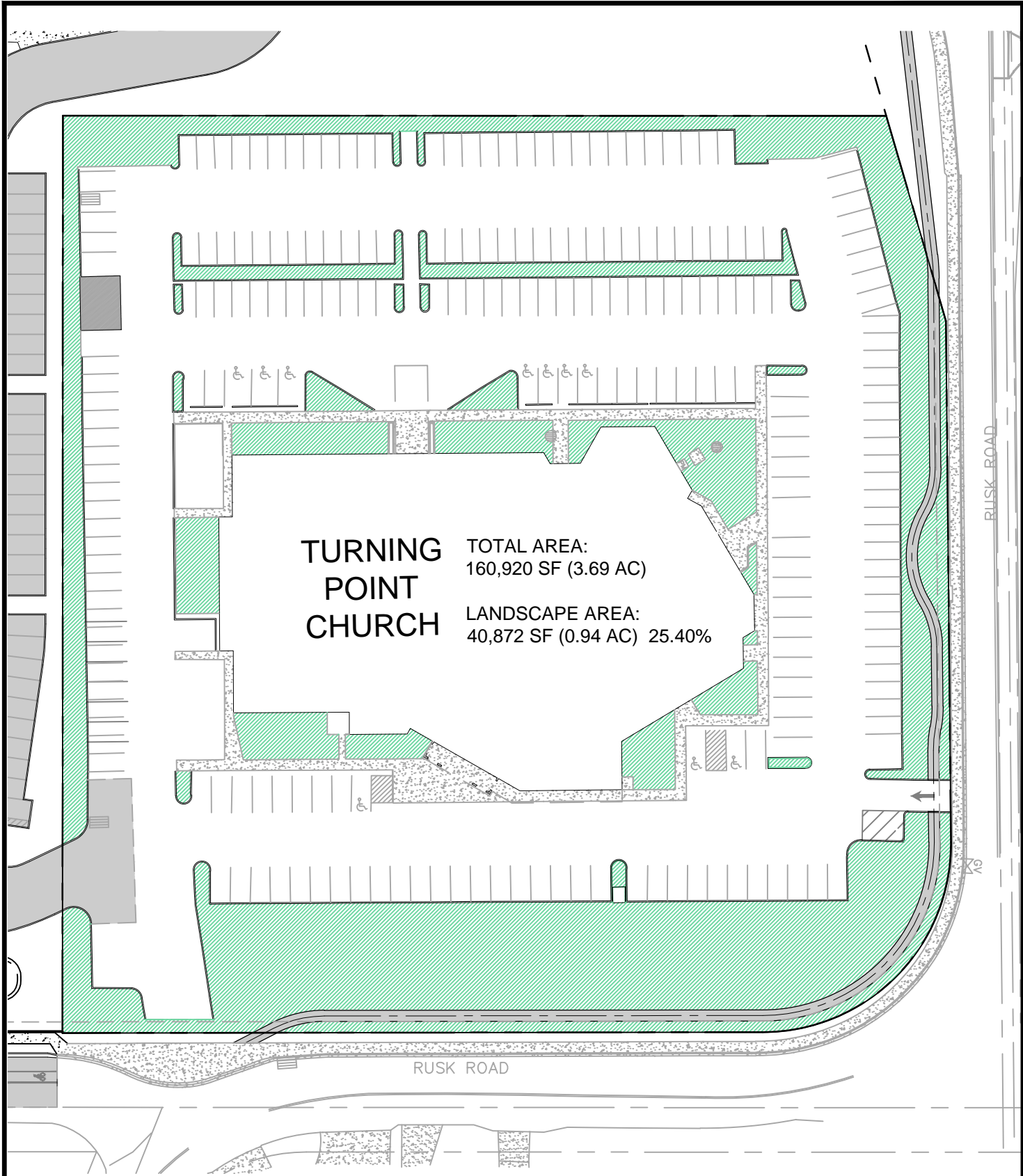
Response: An updated drainage report will be provided to the City that addresses the comments above. The updated report will be provided separately from this submittal but will be provided in time for incorporation into the staff report (no later than January 28).

With submittal of this information, we request that you deem our application complete as of the date of this letter and begin the review process. We understand that our first hearing before the Planning Commission will be February 26, 2019 – please confirm. Thank you for your review and please contact me if you have any questions.

Sincerely,

Serah Breakstone, AICP
Senior Planner

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TURNING POINT CHURCH
TOTAL AREA: 160,920 SF (3.69 AC)
LANDSCAPE AREA: 40,872 SF (0.94 AC) 25.40%

SITE PLAN
SCALE: 1" = 60'



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**Bonaventure Senior Living
TPC Landscape Area**
Milwaukie, Oregon

PROJECT	14497.01
DATE	1/7/19

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SITE INFORMATION

TOTAL SITE AREA	605,385.03 SF	13.890 ACRES	100.00%
LOT COVERAGE	167,270.40 SF	3.840 ACRES	27.63%
LANDSCAPE/OPEN SPACE AREA	438,113.63 SF	10.058 ACRES	72.37%

PARKING	
132	STANDARD PARKING STALLS
6	ADA PARKING STALLS
1	ADA WHEELCHAIR USER ONLY PARKING STALL
139	TOTAL PARKING STALLS

LEGEND:

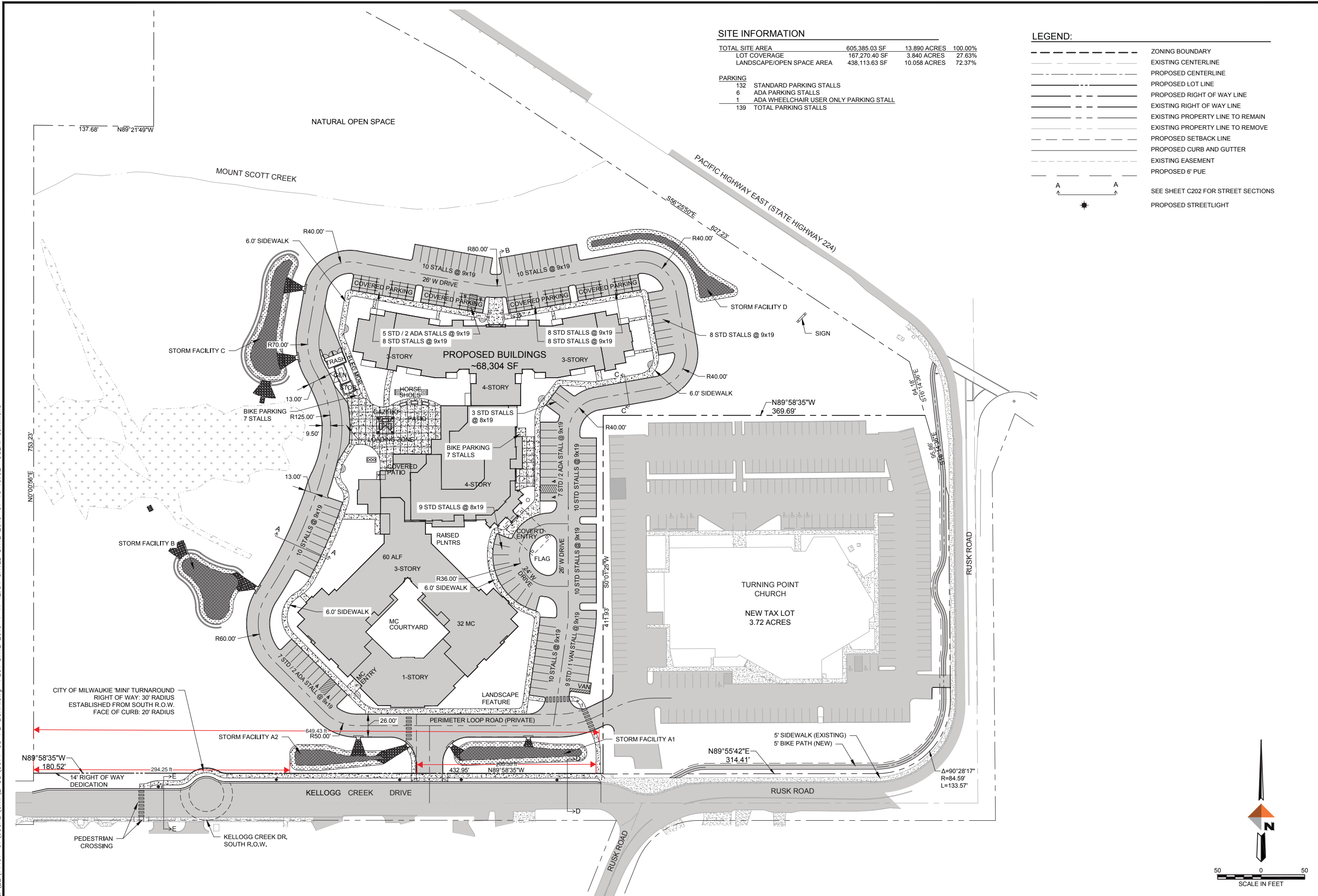
- ZONING BOUNDARY
 - EXISTING CENTERLINE
 - PROPOSED CENTERLINE
 - PROPOSED LOT LINE
 - PROPOSED RIGHT OF WAY LINE
 - EXISTING RIGHT OF WAY LINE
 - EXISTING PROPERTY LINE TO REMAIN
 - EXISTING PROPERTY LINE TO REMOVE
 - PROPOSED SETBACK LINE
 - PROPOSED CURB AND GUTTER
 - EXISTING EASEMENT
 - PROPOSED 6' PUE
- SEE SHEET C202 FOR STREET SECTIONS
- PROPOSED STREETLIGHT



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BONAVENTURE SENIOR HOUSING
 PRELIMINARY SITE PLAN
 BONAVENTURE SENIOR HOUSING
 MILWAUKIE, OREGON
 13333 RUSK ROAD MILWAUKIE, OR 97222

PROJECT 14497-01
 DATE 11/30/2018
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 SHEET
C201



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