



CLACKAMAS COUNTY BOARD OF COMMISSIONERS
2051 Kaen Road, Oregon City
BCC Hearing Room - 4th Floor

LAND USE HEARING
March 22, 2023
10:00 AM

The item will not begin before time noted. Interested parties may appear and be heard during the testimony phase of any hearing at the above address. If a hearing is set for decision only, the evidence phase has been completed, so interested parties may no longer be heard. Applications or comments may be inspected, and calls or correspondence directed to: Planning & Zoning Division, 150 Beaver Creek Road, Oregon City, OR 97045, (503) 742-4500.

HEARING

File No.: Z0542-22-Z

Applicants: Canby School District

Proposal: Z0542-22-Z is a proposal to remove the Historic Landmark (HL) overlay on a portion of the property located at 14412 S. Carus Road, Oregon City, OR 97045, T3S, R2E, Section 33B, Tax Lot 700.

Staff Contact: Joy Fields, Sr. Planner, JFields@clackamas.us, 503-742-4510



Planning & Zoning

Development Services Building
150 Beaver Creek Road | Oregon City, OR | 97045
Phone: (503) 742-4500 | Fax: (503) 742-4550
E-mail: zoninginfo@co.clackamas.or.us
Web: <http://www.clackamas.us/transportation/planning/>

Land Use Hearing Item Staff Summary to the Board of County Commissioners

File Number: Z0542-22-Z; Carus School

Staff Contact: Joy Fields, Planning and Zoning Division, 503-742-4510

Board of County Commissioners Hearing Date: March 22, 2023; 10:00 AM

PROPOSAL:

Z0542-22-Z is a proposal to remove the Historic Landmark (HL) overlay on a portion of the property located at 14412 S Carus Rd, Oregon City, OR 97045, T3S, R2E, Section 33B, Tax Lot 700.

The school district is in the process of selling the historic building for \$1 with the understanding that the buyer will agree to remove and/or demolish the building by the end of the 2022/2023 school year. As an alternative to moving the building, the school district also requested the Historic Review Board to consider the demolition of the building. Consistent with Section 707 of the Zoning and Development Ordinance and following public notice and opportunity to comment, the Historic Review Board recommended and the Planning Director approved the removal or demolition of the building and suspended the removal or demolition for 60 days to ensure all possible options for saving the building had an opportunity to be considered.

Excerpts from the 1990 Historic Landmark Designation, based on the Clackamas County Cultural Resource Inventory of 1984 State Historic Preservation Office file #1134:

- “The subject property was first deeded to the Clackamas School District Number 29 in 1885 by Isaac and Constance Farr. Known locally as the “White Building,” the school, constructed in 1926, has served the community for several decades as a meeting hall, community center and Sunday School for the Methodist Church across the street.”
- “The Carus School is also significant as a fine example of the Bungalow/Craftsman style. Virtually unaltered since construction, the school has many features commonly associated with the stylistic type. The broad gable roof, bargeboards, purlins and braces are all typical features. The porch, a simple gabled projection, is supported by plain posts and enclosed balustrade. The quality of design is rarely found in non-residential buildings.”

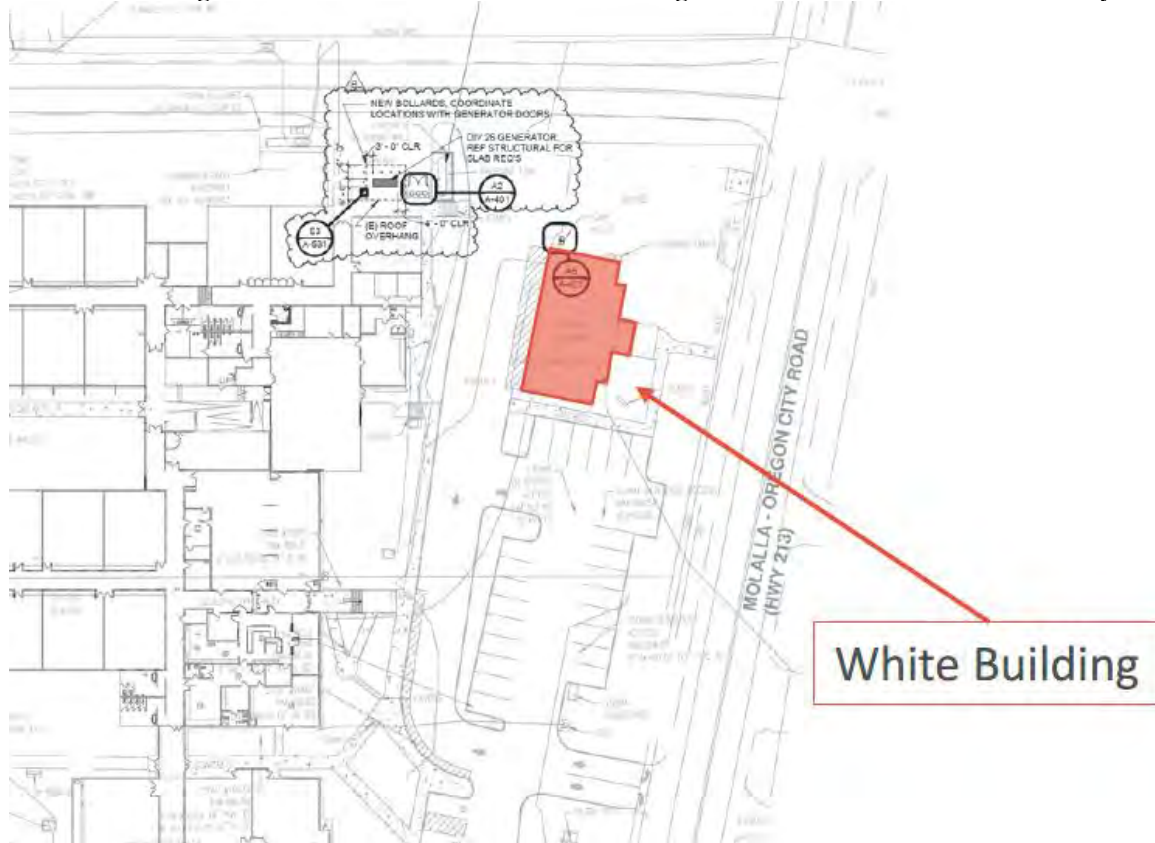
Unfortunately, the Carus School “White Building” stands empty and is unused by the community and the school system due to ADA compliance and liability concerns. Therefore, the historic

structure is no longer actively serving the community as a school, or meeting space on the subject property.

The image below shows the approximate location of the Historic Landmark overlay in purple. Shown in the aerial is the location of the overlay zone in relation to the current school, the existing parking lot, and the Carus School “White Building”.



Site Plan showing location of Carus School “White Building” in relation to the Carus Elementary School



Because the removal of the HL overlay zone is a change to the zoning map, this application is processed as a Type III land use application, in which the Board of County Commissioners (BCC) is the designated decision-making body, after Historic Review Board review and recommendation to the BCC on the matter.

RELATED PRIOR BCC ACTION:

The BCC action, which is relevant to the proposal is the original designation of the Historic Landmark overlay zone through Board Order No. 92-159 (land use file Z1293-90-Z).

HISTORIC REVIEW BOARD RECOMMENDATION:

On March 09, 2023, a public meeting was held before the Historic Review Board (HRB) to consider file Z0542-22-Z. At this meeting, the HRB members unanimously recommended approval of Z0542-22-Z, which would remove the Historic Landmark overlay from the subject site.

CPO AND HAMLET RECOMMENDATIONS:

The subject site is within the boundaries of the Beavercreek Hamlet. Comments were not provided pertaining to the removal of the Historic Landmark overlay zone. However, the Carus School removal was discussed at the December 4th meeting of the Beavercreek Hamlet and they

are working with members of the community to ensure successful removal and re-use of the Carus School “White Building”.

SIGNIFICANT ISSUES:

The structure has been approved to be removed from the subject property through a prior land use File Z0523-22. The Canby School District has worked with the State Historic Preservation Office on a plan to preserve the history of the Carus School when the structure is removed. Therefore, staff does not believe that the proposal to remove the Historic Landmark overlay will have an impact on the continued recognition, or preservation, of the Carus School as a local landmark since the structure will be removed from the subject property.

This site qualified to be named a local Historic Landmark on the basis of a having a historic school with significant architectural features located on the site. Staff reviewed the Historic Landmark designation criteria in the Zoning and Development Ordinance and found that when the Carus School “White Building” is no longer on the site, there are not enough architectural and environmental attributes to qualify the subject property for Historic Landmark designation. When the historic structure is no longer on the site, then the property has lost the qualities for which it was originally recognized and the removal of the Historic Landmark overlay zone would be in compliance with the Clackamas County Comprehensive Plan and the Oregon Administrative Rules.

STAFF RECOMMENDATION:

Planning Staff and the Historic Review Board (HRB) both found that the proposal in Z0542-22-Z meets the applicable criteria for a zone change to remove the HL zoning overlay and recommend the Board of County Commissioners approve Z0542-22-Z.



RECOMMENDATION to BOARD OF COUNTY COMMISSIONERS

This document represents the Recommendation on a Land Use Application requesting the removal of the Historic Landmarkd Overlay to the property known as the Carus School and the “White Building”. The Historic Review Board considered this request and unanimously recommended approval for the removal of the Historic Landmark Overlay District from the subject property.

SECTION 1 – SUMMARY

DATE: March 2, 2023

CASE FILE NO.: Z0542-22-Z

STAFF CONTACT: Joy Fields, jfields@clackamas.us; (503) 742-4510

LOCATION: 14412 S Carus Rd, Oregon City, 97045, located on the southwest corner of the S Carus Rd and Hwy 213 intersection.. Tax Map 32E33B, Tax Lots 00700

APPLICANT: Denise Lapp

OWNER: Canby School District #86

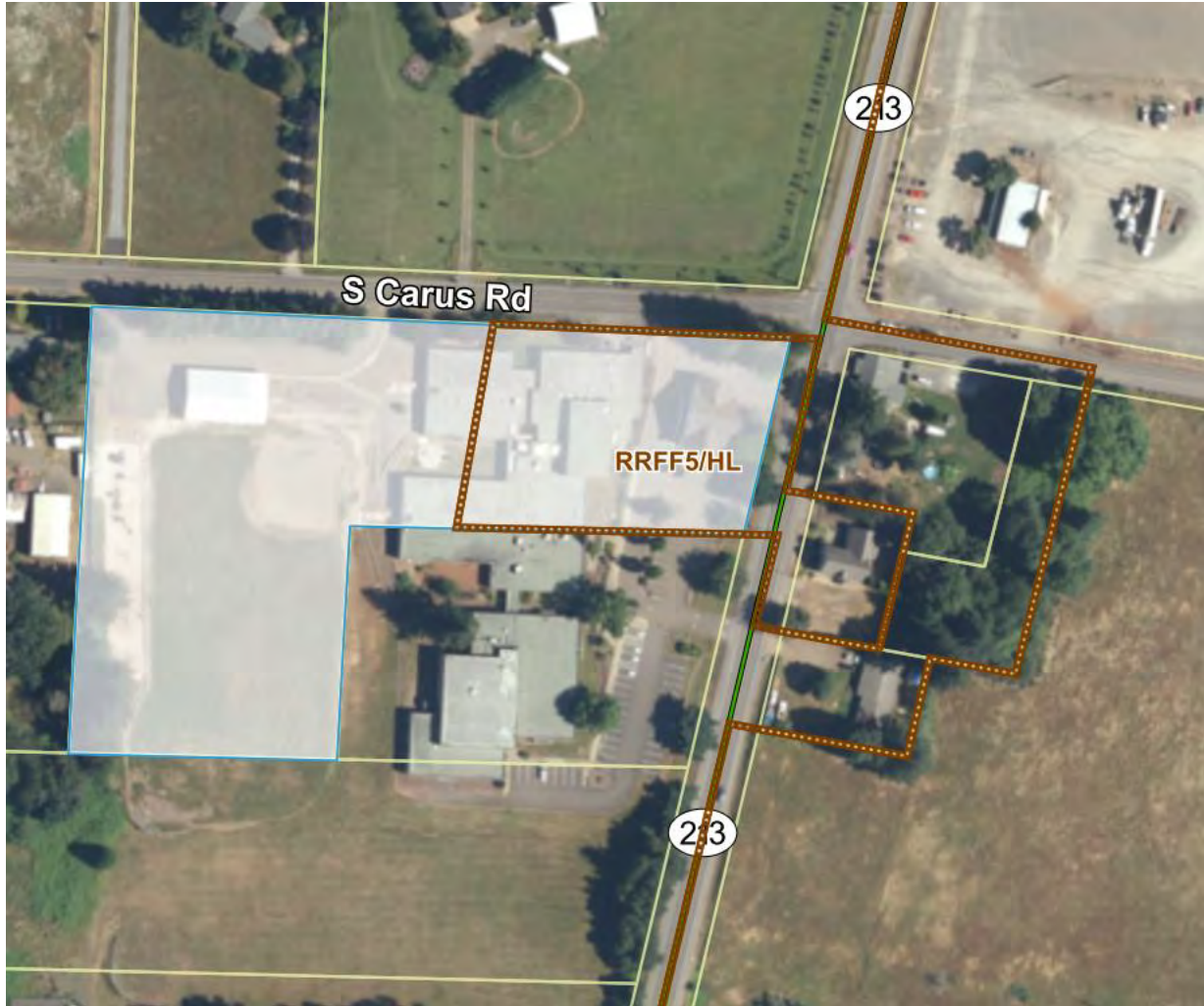
TOTAL AREA: Approximately 0.78 acres in tax lot 700

ZONING: RRFF-5 (Rural Residential Farm Forest 5 Acre) and Historic Landmark Overlay.

PROPOSAL: A zoning map amendment removing the Historic Landmark Overlay Zone from the portion of the site that has been the location of the Carus School “White Building”. The School District is under contract to have the historic building moved to a new location within Clackamas County. In the alternative the building will be demolished. Thus, in either case, the Clackamas County Historic Landmark structure will be removed from the subject property.

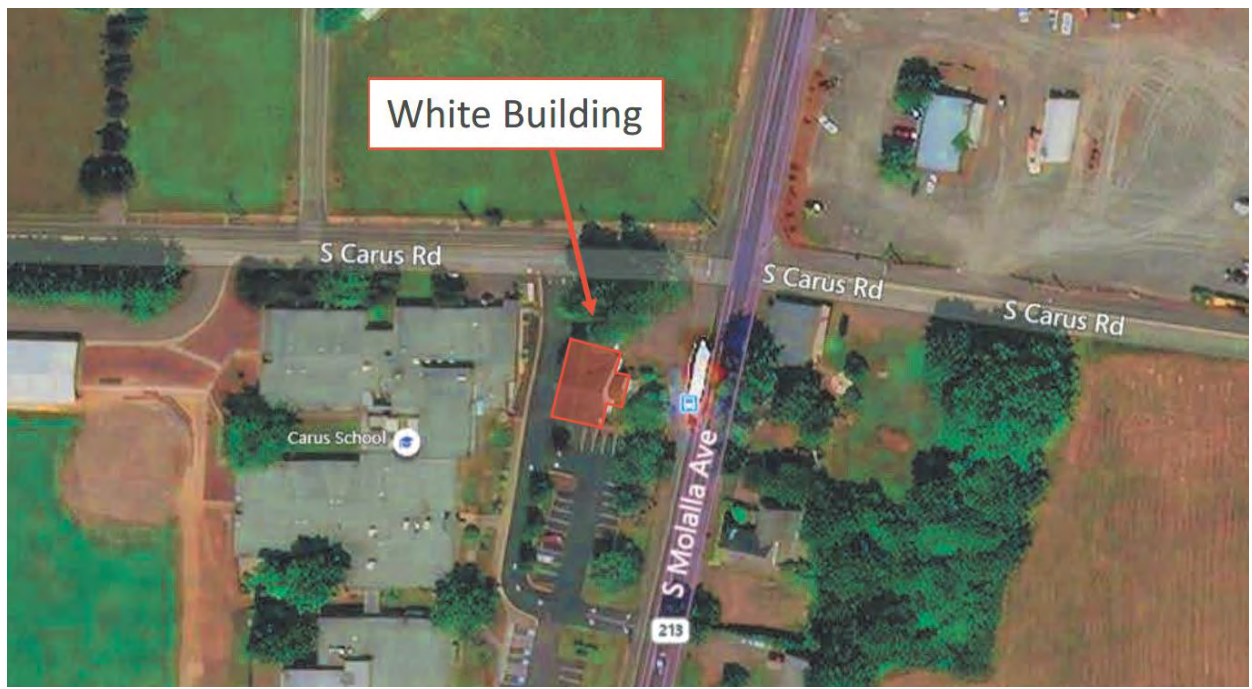
APPLICABLE APPROVAL CRITERIA: This application is subject to Clackamas County Zoning and Development Ordinance (ZDO) Sections(s) 707, 1202, and 1307 and OAR 660-023-0200(9). Staff find that Section 1004 of the ZDO is not applicable since this application is for a proposed removal of an overlay zone and new development is not proposed through Z0542-22. Therefore, pursuant to 1001.01 of the ZDO the *Development Standards* in Section 1000 are not applicable.

Location Map



Site Plan

Historic Landmark Overlay (14412 South Carus Road, Oregon City, OR 97045)



Site Photographs and Media Release

School House



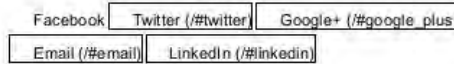
Inside – Deterioration visible



FONT & AUDIO



SHARE THIS



MORE STORIES

Carus White Building now up for sale

John Baker October 14 2021

With an asking price of \$1 and promise of removal, the historic building will be sold or demolished

The Carus White Building is officially up for sale.

On October 11, the Canby School Board authorized the school district to advertise for the sale of the Carus White Building, located on the property of Carus Elementary School, 14412 S. Carus Road in Oregon City.

With the board's approval, the district will list the building for sale with an asking price of \$1 and a requirement that the buyer relocate the building. Sale signs go up this month.

(<https://pamplinmedia.com/images/artimg/00003717050289-0735.jpg>)

If the building remains unsold, it will be demolished.

The old schoolhouse has decayed to the point that it is no longer suitable for use by students and staff. Because of that and the school district's commitment to making the best possible use of its resources and property, the decision has been made to remove the white building from Carus grounds.

Since the building is a historic landmark, the district has been working with a consultant through the process.

Removal of the building will help pave the way for the completion of bond work at Carus, including improved safety at the main entrance, better traffic flow and additional parking.



COURTESY PHOTO: CANBY SCHOOL DISTRICT - The Carus White Building is officially up for sale. It will either be moved by a buyer or it will be demolished.

BACKGROUND:

Excerpts from the 1990 Historic Landmark Designation, based on the Clackamas County Cultural Resource Inventory of 1984, State Historic Preservation Office file #1134:

“now administrative use – new school building behind. Practically no changes to exterior or interior. This is one of 27 schools in Clackamas County extant from the Motor Age (1914-1940). The Carus School has a projecting gable porch, gable roof and purlins and brackets, more closely resembling a Craftsman/; Bungalow dwelling.”

“The subject property was first deeded to the Clackamas School District Number 29 in 1885 by Isaac and Constance Farr. Known locally as the “White Building,” the school, constructed in 1926, has served the community for several decades as a meeting hall, community center and Sunday School for the Methodist Church across the street.”

“The Carus School is also significant as a fine example of the Bungalow/Craftsman style. Virtually unaltered since construction, the school has many features commonly associated with the stylistic type. The broad gable roof, bargeboards, purlins and braces are all typical features. The porch, a simple gabled projection, is supported by plain posts and enclosed balustrade. The quality of design is rarely found in non-residential buildings.”

The Historic Landmark Overlay District covers 0.78 acres of the 4.75 acre property. The 0.78 acres of designated area was calculated in the 1990 land use file Z1293-90 as: 199 feet along Hwy 213 by 170 feet along Carus Rd.

Previous land use decisions include:

- A. CU-41-74: Conditional use approval of the school;
- B. DR-10-6-77: Design review and approval of parking lot in the northeast corner;
- C. 1022-80-C,D: Northwest parking lot authorized under Design Review approval for 20 parking spaces only;
- D. 934-80-V; Variance
- E. Z1293-90-Z (HL): Designation of 0.78 acres and the historic white building as a Historic Landmark;
- F. Z0448-01-C: Courtyard and parking lot modifications;
- G. ZPAC0112-21: The pre-application conference for the removal/demolition of the Historic Landmark and modifying the traffic pattern at the school;
- H. Z0523-22-HR: Approval to remove or demolish the Carus School “White Building”.

The school district is in the process of selling the historic building for \$1 with the understanding that the buyer will agree to remove and/or demolish the building by the end of the 2022/2023 school year. As an alternative to moving the building, the school district also requested the Historic Review Board to consider the demolition of the building. Consistent with Section 707 of the Zoning and Development Ordinance and following public notice and opportunity to comment, the Historic Review Board recommended and the Planning Director approved the removal or demolition of the building and suspended the removal or demolition for 60 days to ensure all possible options for saving the building had an opportunity to be considered. The school district has pursued the removal and demolition options concurrently to ensure the school district can move forward with the land use planning process for future site improvements in case the relocation and sale of the building is unsuccessful. The school district intends to use the additional space to change traffic and parking patterns on the Carus Elementary School site, which is also intended to improve traffic safety at the intersection of Carus Road and Highway 213. Prior to seeking land use approval for a modification of the previous Conditional Use permit for the school, the property owners are requesting that the Historic Landmark Overlay Zoning District is removed.

DISCUSSION AND RECOMMENDATION:

The school district and community have been diligently working towards moving the historic structure to a new location within Clackamas County. Once the building is no longer on the site, the structure that led to the Historic Landmark Overlay Zone being placed on the property will be gone. The School District has agreed to install a sign near the location to document and share the history of the Carus School “White Building” with current and future generations that use the Carus Elementary school property.

The Planning and Zoning Staff finds that, based on the findings below, the subject site will no longer have the historical significance supporting the Historic Landmark Overlay zoning after the Carus School “White Building” is removed. Based on analysis of the ordinance standards, staff recommends removal of the overlay zoning from the subject site.

Findings:

707.01 PURPOSE Section 707 is adopted to:

- A. Implement the goals and policies of the Comprehensive Plan for Historic Landmarks, Districts, and Corridors;*
- B. Promote the public health, safety, and general welfare by safeguarding the County's heritage as embodied and reflected in its historic resources;*
- C. Provide for the identification, protection, enhancement, and use of sites, structures, corridors, objects, and buildings within the County that reflect special elements of the County's architectural, archeological, artistic, cultural, engineering, aesthetic, historical, political, social, and other heritage;*
- D. Facilitate restoration and upkeep of historic buildings, structures or other physical objects or geographical areas;*
- E. Encourage public knowledge, understanding and appreciation of the County's history and culture;*
- F. Foster community and neighborhood pride and sense of identity based on recognition and use of cultural resources;*
- G. Promote the enjoyment and use of historic and cultural resources appropriate for the education and recreation of the people of the County;*
- H. Preserve diverse architectural styles reflecting phases of the County's history; and encourage complimentary design and construction impacting cultural resources;*
- I. Enhance property values and increase economic and financial benefits to the County and its inhabitants;*
- J. Identify and resolve conflicts between the preservation of cultural resources and alternative land uses; and*
- K. Integrate the management of cultural resources and relevant data into public and private land management and development processes.*

Finding: The historic structure known as the Carus School and the “White Building” has not been used for many years and thus has stopped fostering neighborhood pride and sense of identity through the use of cultural resources. Also, due to ADA access issues and safety concerns, the Historic Landmark has not been used to promote the enjoyment and use of historic and cultural resources appropriate for the education and recreation of the people of the County. Therefore, while the designation of the Carus School as a Historic Landmark in 1992 “Provided for the identification, protection, enhancement, and use of sites, structures, corridors, objects, and buildings within the County that reflect special elements of the County's architectural, archeological, artistic, cultural, engineering, aesthetic, historical, political, social, and other heritage”, the structure is no longer supporting the purpose of Section 707 as identified in 707.01.

This and previous land use applications are the way that the management of cultural resources has been incorporated into the public development process. This application is also a way that the Historic Review Board can identify and help resolve conflicts between the preservation of cultural resources and the alternate use of the property for current school use.

As the applicant noted in the application, the removal of the White Building and corresponding Historic Landmark Overlay on the Carus Elementary School site will allow for significant planned on-site vehicle circulation improvements. The current vehicle access to and circulation within Carus Elementary School causes back-up on South Carus Road, a serious safety hazard.

Section 707.02 APPLICABILITY

A. Section 707 applies to designated Historic Landmarks, Historic Districts, and Historic Corridors

Finding: The property at 14412 S Carus Rd, Oregon City, 97045 is a designated Historic Landmark. This criterion is met.

Section 707.04 Uses Permitted

A. Primary Uses: A Historic Landmark or properties within a Historic District or Historic Corridor may be used for any use which is allowed in the underlying zoning district, including home occupations, provided such use is not detrimental to the preservation of the historic resource, subject to the specific requirements for the use, and all other requirements of Section 707.

Finding: The Historic Landmark designation is an overlay zoning district. The underlying zoning district of the subject property is RRFF-5. This application does not propose development of the site with a primary use permitted in the RRFF-5 zone. This criterion is not applicable.

Section 707.05 Historic Review Board

A Historic Review Board shall be established pursuant to Subsection 1307.03 and shall have the following responsibilities:

E. Review and make recommendations on all applications for zoning of a Historic Landmark, a Historic District, or a Historic Corridor, subject to Subsections 707.02 and 707.06;

Finding: The applicant is proposing to remove the Historic Landmark Overlay Zone in conjunction with the removal, or demolition, of a structure that was designated as a Historic Landmark. Thus, the Historic Review Board reviewed and staff approved the removal or demolition of the structure (File Z0523-22) and the Historic Review Board subsequently reviewed and is now recommending to the Board of County Commissioners that the Historic Landmark Overlay Zone be removed. This criterion is met.

707.06 THE REVIEW PROCESS

Subsection 707.06 applies to all Historic Landmarks, properties within Historic Districts and Historic Corridors, and contributing resources therein.

A. Designation and Zoning: Comprehensive Plan designation and zoning of a Historic Landmark, Historic District, or Historic Corridor shall be subject to the procedures identified in Section 1307 for Comprehensive Plan amendments and zone changes, respectively. In addition:

1. The Historic Review Board shall evaluate proposed designation and zoning of a Historic Landmark, Historic District, or Historic Corridor and shall make a recommendation to the Board of County Commissioners.

2. Pending Permits: No building permit for altering or moving any proposed Historic Landmark or any building within an area proposed for designation as a Historic Landmark, Historic District, or Historic Corridor, shall be issued while any advertised public hearing or any appeal affecting the proposed designation of the area or building is pending. In addition, demolition of a building affected by a pending public hearing or appeal under Subsection 707.06(A) shall be a violation of this Ordinance.

Finding: The standards for designation as a Historic Landmark are analyzed in the following section.

The proposal is not to *designate* a Historic Landmark, but rather to remove the HL overlay zone. Therefore, 707.06(A)(2) is not applicable.

This criterion is met.

Section 707.02(B) – Historic Landmark

B. Historic Landmark: A site, structure, or object may be zoned Historic Landmark if it is listed on the National Register of Historic Places, or if it is rated as significant under the County's procedure for evaluating historic resources under the specific architectural, environmental, and historic association criteria. A site or structure must receive a minimum of 40 points under the following criteria to be considered for Historic Landmark status:

1. Architectural Significance

- a. It is an early (50 years or older), or exceptional, example of a particular architectural style, building type, or convention. (up to 10 points)*
- b. It possesses a high quality of composition, detailing, and craftsmanship. (up to 4 points)*
- c. It is a good, or early, example of a particular material or method of construction. (up to 4 points)*
- d. It retains, with little or no change, its original design features, materials, and character. (up to 7 points)*
- e. It is the only remaining, or one of the few remaining, properties of a particular style, building type, design, material, or method of construction. (up to 10 points)*

2. Environmental Significance

- a. It is a conspicuous visual landmark in the neighborhood or community. (up to 10 points)*
- b. It is well-located considering the current land use surrounding the property, which contributes to the integrity of the pertinent historic period. (up to 4 points)*
- c. It consists of a grouping of interrelated elements including historic structures, plant materials and landscapes, viewsheds and natural features. (up to 10 points)*
- d. It is an important or critical element in establishing or contributing to the continuity or character of the street, neighborhood, or community. (up to 7 points)*

3. Historical Significance a. It is associated with the life or activities of a person, group, organization, or institution that has made a significant contribution to the community, state, or nation. (up to 10 points)

Finding: The property was designated as a Clackamas County Historic Landmark based in large part due to the architectural significance of the Carus School “White Building”. However, under a previous land use application and consistent with the ZDO 707, the building has been approved for removal or demolition. When the Carus School “White Building” is no longer located on the site, the maximum amount of points possible for the current landmark overlay is less than 40 points based only on Environmental Significance and Historic Significance. While the property is still being used as a school (4 points), the location of the Historic Landmark Overlay Zone is predominantly parking lot and there are little to no natural features, viewsheds, or landscaping that are significant to the site without the Carus School “White Building” being part of the Environmental Significance. Therefore,

without the historic structure, staff find that it could possibly receive 5 points for Environmental Significance and 10 points for Historical Significance. With the removal of the Carus School “White Building” from the site, a rating of 15 points would not be enough to designate it as a Historic Landmark, thus staff suggest that the Historic Landmark Zoning Overlay should be removed because the subject property will no longer have the historical significance that it once had. This standard is met.

OAR 660-023-0200 (9) Removal of a historic resource from a resource list by a local government is a land use decision and is subject to this section.

(b) Except as provided in subsection (a), a local government may only remove a resource from the resource list if the circumstances in paragraphs (A), (B), or (C) exist.

(A) The resource has lost the qualities for which it was originally recognized;

(B) Additional information shows that the resource no longer satisfies the criteria for recognition as a historic resource or did not satisfy the criteria for recognition as a historic resource at time of listing;

(C) The local building official declares that the resource poses a clear and immediate hazard to public safety and must be demolished to abate the unsafe condition.

Finding: The property was designated as a Clackamas County Historic Landmark based on the presence of the Carus School “White Building”. When the Carus School White Building is removed, the Historic Landmark resource will no longer have the qualities for which it was originally recognized. These criteria are met.

1202.01 PURPOSE AND APPLICABILITY

Section 1202 is adopted to provide standards, criteria, and procedures under which a change to the zoning maps (hereinafter referred to as a zone change) may be approved.

Finding: The applicant is requesting to remove the Historic Landmark Overlay Zone and thus change the zoning maps. This criterion is met.

1202.03 GENERAL APPROVAL CRITERIA

A zone change requires review as a Type III or IV application pursuant to Section 1307, Procedures, and shall be subject to the following standards and criteria:

A. The proposed zone change is consistent with the applicable goals and policies of the Comprehensive Plan.

Finding: The property was designated as a Clackamas County Historic Landmark based on the presence of the Carus School “White Building”. When the Carus School White Building is removed, the Historic Landmark resource will no longer have the qualities for which it was originally recognized. The proposed zone change will be consistent with the Comprehensive Plan because there will no longer be an historic structure on the Carus Elementary School Site to which to apply the Historic Landmark Overlay Zone. As noted by the applicant “Chapter 9 of the County’s Comprehensive Plan includes Historic Landmarks, Districts, and Transportation Corridors Policies (Section 9.C). In particular, Policy 9.C.4 addresses zoning a property Historic Landmark (HL) when “determined significant by the evaluation criteria.” The White Building was designated a Historic Landmark in 1990; as part of a 0.78-acre area on the Carus Elementary

School site, it was zoned with a Historic Landmark Overlay, pursuant to approval of File Z1293-90-Z (HL).” As noted in the findings above, when the architectural elements of the Carus School “White Building” are removed, the evaluation criteria would no longer identify the 0.78 acres as historically significant. Therefore, when the historic structure is removed, Clackamas County Comprehensive Plan Policy 9.C.4 will be met. This criterion can be met with conditions related to the timing of the Historic Landmark Overlay Zone designation removal.

The removal of the structure will also allow for planned on-site vehicle circulation improvements that are consistent with Chapter 5 of the Clackamas County Comprehensive Plan and the Road Safety Policies.

This criterion can be met with conditions.

B. If development under the proposed zoning district designation has a need for any of the following public services, the need can be accommodated with the implementation of the applicable service provider’s existing capital improvement plan: sanitary sewer, surface water management, and water. The cumulative impact of the proposed zone change and development of other properties under existing zoning designations shall be considered.

Finding: The Canby School District currently owns and operates the property as a school. The removal of the Historic Landmark Overlay Zone is not anticipated to create a difference in public service needs. The School District intends to implement projects identified in existing capital improvement plans once the Carus School “White Building” is removed. Therefore, this criterion is met.

C. The transportation system is adequate and will remain adequate with approval of the proposed zone change. For the purpose of this criterion:

Finding: As noted by the applicant “The Historic Landmark Overlay applies only to the area of the White Building on the Carus Elementary School site. Its removal and development [of the site] that could then occur pursuant to the underlying RRFF-5 zoning is so minimal as to constitute no substantial difference in transportation system impacts and needs.” The addition of parking spaces and changes to the transportation flow for the existing school is not anticipated to increase the number of students served by the school and thus there would not be an increase in the use of the transportation system. This criterion is met.

D. Safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.

Finding: As noted by the applicant “Currently, vehicle access to and circulation within Carus Elementary School backs up on South Carus Road, a serious safety hazard. The removal of the White Building and the corresponding Historic Landmark Overlay on the Carus Elementary School site will allow for significant on-site vehicle circulation improvements. Thus, the proposed zone change will facilitate safer transportation system conditions.” The proposed zone change will not change the underlying RRFF-5 Zoning District, or the capacity of the school. Therefore, an increase in the use of the existing transportation system is not anticipated. This criterion is met.

SUMMARY OF FINDINGS AND DECISION

The Planning and Zoning Staff finds that the site no longer meets the standards of eligibility for protection by the Clackamas County Historic Landmark Overlay Zone because the Architectural and Environmental Significance will no longer be there when the Carus School “White Building” is removed.

Based on the above analysis of the applicable ZDO and Oregon Administrative Rule standards, staff recommends the removal of the HL (Historic Landmark) zoning on this property. The Historic Review Board considered this proposal and also recommended the removal of the HL zoning on this property.

RECEIVED



DEC 20 2022

Clackamas County
Planning & Zoning Division

Clackamas County Planning and Zoning
Department of Transportation and Development
Development Services Building
150 Beaver Creek Road | Oregon City, OR 97045
503-742-4500 | zoninginfo@clackamas.us
www.clackamas.us/planning

NOTICE OF INCOMPLETE TYPE II OR III LAND USE APPLICATION

FILE NUMBER: Z0542-22
APPLICATION TYPE: Zone Change
APPLICANT NAME: Denise Lapp
SITE ADDRESS: 14412 S CARUS RD, OREGON CITY, OR 97045
STAFF CONTACT: Joy Fields EMAIL: jfields@clackamas.us
DATE OF APPLICATION SUBMITTAL: November 21, 2022
DATE DEEMED INCOMPLETE: 12/6/22
DATE OF MAILING OF THIS NOTICE: 12/6/22
DEADLINE FOR SUBMITTAL OF MISSING INFORMATION: 6/5/23

Your Type II or III land use application has been deemed **incomplete**. Pursuant to Subsection 1307.07(E) of the Clackamas County Zoning and Development Ordinance, your application will be void unless the missing information is submitted within 180 days of the date the application was first submitted. Upon voiding of an application, 75 percent of your application fee will be refunded, and you will need to reapply if you are still interested in obtaining this permit.

MISSING INFORMATION REQUIRED FOR A COMPLETE APPLICATION:

- A. The Clackamas County Comprehensive Plan has goals and policies related to Historic Sites. While your application highlights the traffic safety goals of the Comprehensive Plan, you are proposing to remove the Historic Landmark Zoning Overlay for a Historic Site so the Historic Site goals and policies apply to the application. Please review Chapter 9 of the Comprehensive Plan and provide narrative regarding how the zone change application relates to the Historic Sites goals and policies of the Comprehensive Plan. The Comprehensive Plan is available for viewing here:
<https://www.clackamas.us/planning/comprehensive.html>.

IMPORTANT

Your application will be deemed complete, if, within 180 days of the date the application was first submitted, Planning and Zoning receives one of the following:

1. All of the missing information; or
2. Some of the missing information and written notice from you (the applicant) that no other information will be provided; or
3. Written notice from you (the applicant) that none of the missing information will be provided.

If any one of these options is chosen within 180 days of the date of the initial submittal, approval or denial of your application will be subject to the relevant criteria in effect on the date the application was first submitted.

Your application will be considered void if, on the 181st day after the date the application was first submitted, you have been mailed this notice and have not provided the information requested in Options 1-3 above. In this case, no further action will be taken on your application.

Applicant or authorized representative, please check one of the following and return this notice to: **Clackamas County Planning and Zoning, 150 Beavercreek Road, Oregon City, OR, 97045**

- I am submitting the required information (attached); or
- I am submitting some of the information requested (attached) and no other information will be submitted; or
- I will not be submitting the requested information. Please accept the application as submitted for review and decision.

Jenise Lapp
Signed

12/20/22
Date

Jenise Lapp
Print Name

Z0542-22:

Historic Landmark Overlay Zone Removal

Assessor's Map & Tax Lot(s): T3S R2E Section 33B Tax Lot 00700
Site Address 14412 S Carus Rd, Oregon City, 97045,
Applicant: Denise Lapp;

March 22, 2023

Board of County Commissioners Land Use Hearing



Proposal

- ▶ The applicant is proposing a zoning map amendment to remove the Historic Landmark Overlay Zone from the portion of the site that has been the location of the Carus School "White Building". The School District is under contract to have the historic "White Building" moved to a new location within Clackamas County and are requesting the removal of the Clackamas County Historic Landmark Overlay Zone from the subject property.
- ▶ The Historic Landmark Overlay Zone covers 0.78 acres of the 4.75 acre property.



Site Logistics

- ▶ Legal Description: 32E33B 00700
- ▶ Zone: Rural Residential Farm Forest 5-Acre (RRFF-5)
- ▶ Acreage: 4.75 Historic overlay covers 0.78 acres
- ▶ Other Relevant Land Use Approvals:
 - ▶ Z0523-22; The approval to remove the structure from the property with a 60 day suspension of demolition

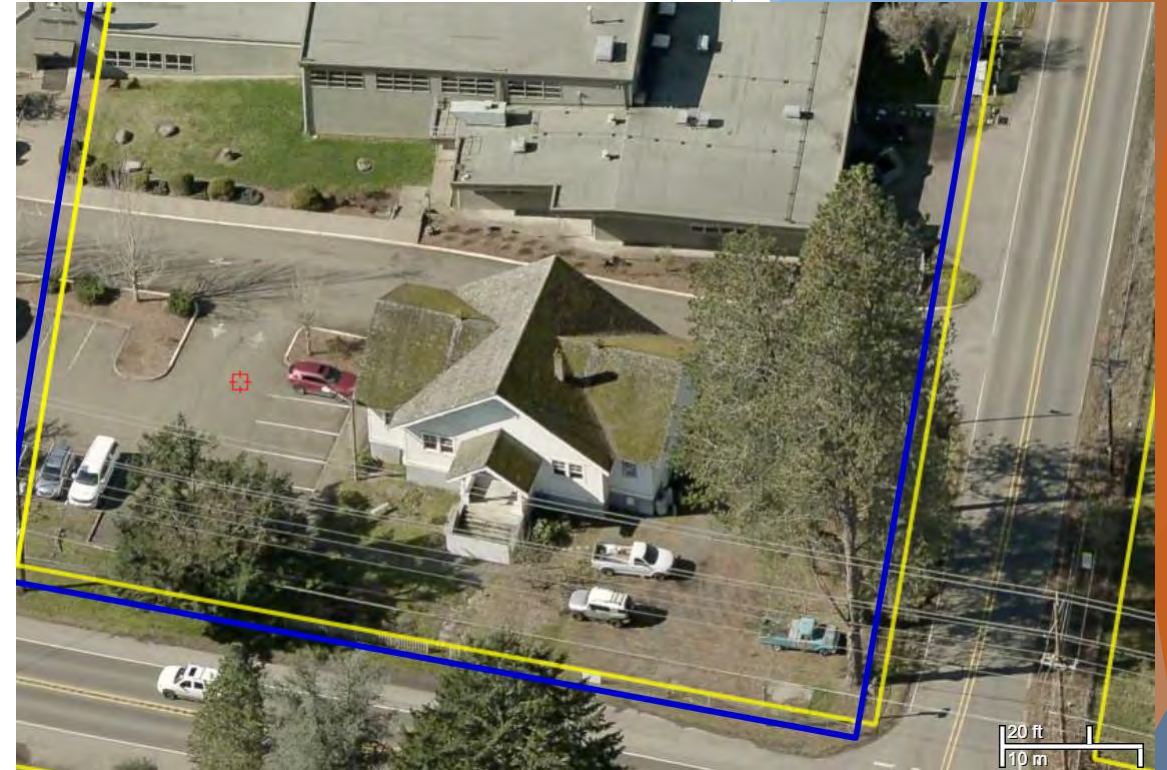


Subsection 707.02

B. Historic Landmark: A site, structure, or object may be zoned Historic Landmark if it is listed on the National Register of Historic Places, or if it is rated as significant under the County's procedure for evaluating historic resources under the specific architectural, environmental, and historic association criteria. A site or structure must receive a minimum of 40 points under the following criteria to be considered for Historic Landmark status

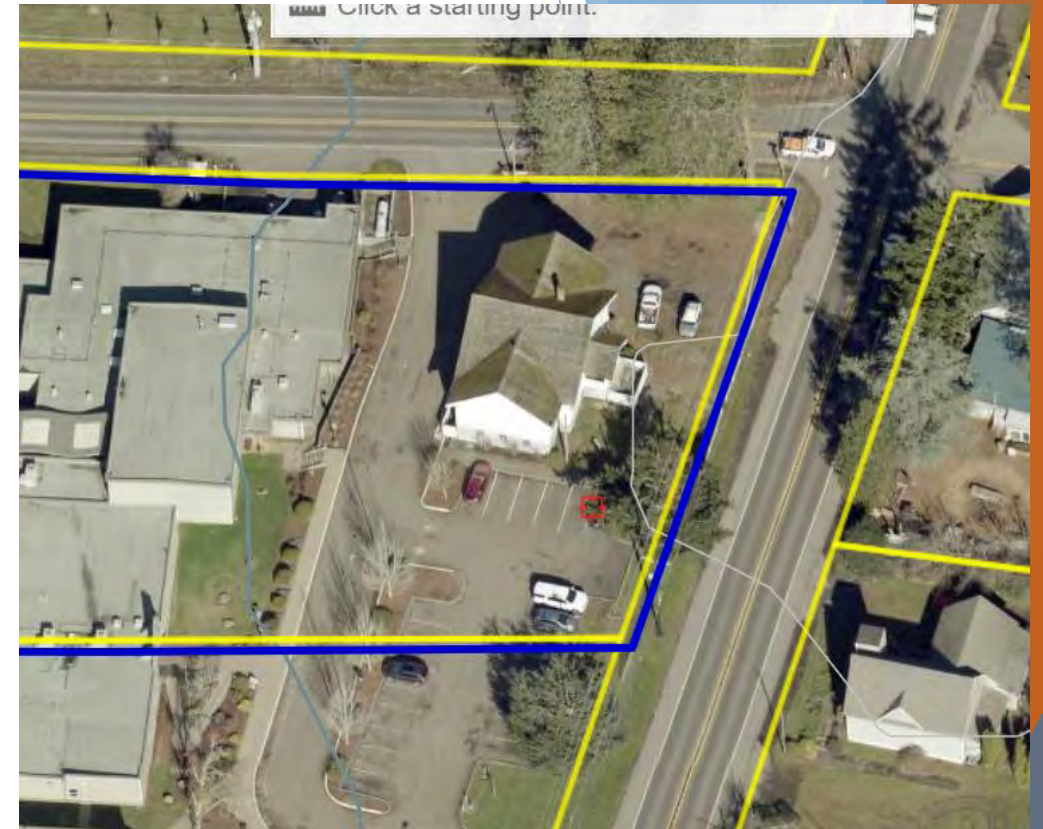
Subsection 707.02

- ▶ *Subsection 707.02 (B)*
- ▶ 1: Architectural Significance
- ▶ 2: Environmental Significance
- ▶ 3: Historical Significance



OAR 660-023-0200 (9)

- ▶ *Removal of a historic resource from a resource list by a local government is a land use decision and is subject to this section.*
- ▶ *(b) Except as provided in subsection (a), a local government may only remove a resource from the resource list if the circumstances in paragraphs (A), (B), or (C) exist.*
 - ▶ *(A) The resource has lost the qualities for which it was originally recognized;*
 - ▶ *(B) Additional information shows that the resource no longer satisfies the criteria for recognition as a historic resource or did not satisfy the criteria for recognition as a historic resource at time of listing;*
 - ▶ *(C) The local building official declares that the resource poses a clear and immediate hazard to public safety and must be demolished to abate the unsafe condition.*



1202.03 GENERAL APPROVAL CRITERIA

- ▶ A zone change requires review as a Type III or IV application pursuant to Section 1307, Procedures, and shall be subject to the following standards and criteria:
- ▶ A. The proposed zone change is consistent with the applicable goals and policies of the Comprehensive Plan.
- ▶ As noted by the applicant " Chapter 9 of the County's Comprehensive Plan includes Historic Landmarks, Districts, and Transportation Corridors Policies (Section 9.C). In particular, Policy 9.C.4 addresses zoning a property Historic Landmark (HL) when " determined significant by the evaluation criteria."

1202.03 GENERAL APPROVAL CRITERIA

- ▶ C. The transportation system is adequate and will remain adequate with approval of the proposed zone change. For the purpose of this criterion:
- ▶ Removal of the Overlay Zone and development [of the site] that could then occur pursuant to the underlying RRFF-5 zoning so minimal as to constitute no substantial difference in transportation system impacts and needs." The addition of parking spaces and changes to the transportation flow for the existing school is not anticipated to increase the number of students served

Historic Review Board Recommendation

- ▶ To approve removal of Historic Landmark overlay zone as recommended in Staff Report



Questions?





Carus Elementary School Zone Change

Narrative

Prepared for Canby School District



Prepared by MIG | APG

Submitted to Clackamas County, Current Planning

Originally submitted: November 18, 2022 | Revisions submitted: December 12, 2022

1202 ZONE CHANGES

1202.01 PURPOSE AND APPLICABILITY

Section 1202 is adopted to provide standards, criteria, and procedures under which a change to the zoning maps (hereinafter referred to as a zone change) may be approved.

1202.03 GENERAL APPROVAL CRITERIA

A zone change requires review as a Type III or IV application pursuant to Section 1307, Procedures, and shall be subject to the following standards and criteria:

A. How is the proposed zone change consistent with the applicable goals and policies of the County's Comprehensive Plan?

Response: The removal of the White Building and corresponding Historic Landmark Overlay on the Carus Elementary School site will allow for significant planned on-site vehicle circulation improvements. The current vehicle access to and circulation within Carus Elementary School causes back-up on South Carus Road, a serious safety hazard.

One of the County's goals is to improve the safety of its system for all users and reduce the number and severity of crashes for future years, consistent with Chapter 5 of the County Comprehensive Plan and Road Safety Policies (Section 5.B). Developing facilities to accommodate all modes of travel will help reduce conflicts that lead to safety problems for some users. The adopted Transportation Safety Action Plan calls for a 50 percent reduction of fatal and serious injury crashes by 2022.

Chapter 9 of the County's Comprehensive Plan includes Historic Landmarks, Districts, and Transportation Corridors Policies (Section 9.C). In particular, Policy 9.C.4 addresses zoning a property Historic Landmark (HL) when "determined significant by the evaluation criteria." The White Building was designated a Historic Landmark in 1990; as part of a 0.78-acre area on the Carus Elementary School site, it was zoned with a Historic Landmark Overlay, pursuant to approval of Z1293-90-Z (HL).

Upon approval of the proposed Historic Landmark Removal or Demolition for the White Building (Z0523-22-HR), the proposed zone change will ~~also~~ be consistent with the Comprehensive Plan because there will no longer be an Historic Landmark on the Carus Elementary School Site to which to apply the Historic Landmark existing eOverlay zone.

B. If development under the proposed zone would need public services (sanitary sewer, surface water management, and water), could the need be accommodated with the implementation of the applicable service provider's existing capital improvement plan? The cumulative impact of the proposed zone

change and development of other properties under existing zoning designations must be considered.

Response: The Historic Landmark Overlay applies only to the area of the White Building on the Carus Elementary School site. Its removal and development that could then occur pursuant to the underlying RRF-5 zoning is so minimal as to constitute no substantial difference in public service needs. Consequently, the development could be accommodated under existing capital improvement plans.

C. Explain how the transportation system is adequate and will remain adequate with approval of the proposed zone change. This explanation should take into consideration the following:

1. "Adequate" means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, Motor Vehicle Capacity Evaluation Standards for the Urban Area, and 5-2b, Motor Vehicle Capacity Evaluation Standards for the Rural Area.

2. Conduct the evaluation of transportation system adequacy pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).

3. Assume that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.

4. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.

5. The adequacy standards apply to all roadways and intersections within the impact area of the proposed zone change. The impact area is identified based on the Clackamas County Roadway Standards.

6. A determination of whether submittal of a transportation impact study is required is made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.

7. Notwithstanding Subsections 1202.03(C)(4) through (6), motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODOT Transportation Analysis Procedures Manual for roadways and intersections under the jurisdiction of the State of Oregon.

Response: The Historic Landmark Overlay applies only to the area of the White Building on the Carus Elementary School site. Its removal and development that could then occur pursuant to the underlying RRF-5 zoning is so minimal as to constitute no substantial difference in transportation system impacts and needs.

D. Explain how the safety of the transportation system is adequate to serve the level of development

anticipated by the proposed zone change.

Response: Currently, vehicle access to and circulation within Carus Elementary School backs up on South Carus Road, a serious safety hazard. The removal of the White Building and the corresponding Historic Landmark Overlay on the Carus Elementary School site will allow for significant on-site vehicle circulation improvements. Thus, the proposed zone change will facilitate safer transportation system conditions.



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Prepared for Canby School District



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B. If development under the proposed zone would need public services (sanitary sewer, surface water management, and water), could the need be accommodated with the implementation of the applicable service provider's existing capital improvement plan? The cumulative impact of the proposed zone change and development of other properties under existing zoning designations must be considered.

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- 2. Conduct the evaluation of transportation system adequacy pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).*
- 3. Assume that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.*
- 4. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.*
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Planning and Zoning
Department of Transportation and Development
 Development Services Building
 150 Beavercreek Road | Oregon City, OR 97045
 503-742-4500 | zoninginfo@clackamas.us
 www.clackamas.us/planning

STAFF USE ONLY	
RECEIVED	
Nov 21 2022	
Clackamas County Planning & Zoning Division	
Z0542-22-Z	
Staff Initials:	File Number:

Land use application for:

ZONE CHANGE

Reviewed by Hearings Officer

APPLICANT INFORMATION			
Applicant name: Denise Lapp, Canby School District	Applicant email: denise.lapp@canby.k12.or.us	Applicant phone: 503-266-0020	
Applicant mailing address: 1130 S Ivy Street	City: Canby	State: OR	ZIP: 97013
Contact person name (if other than applicant): Shayna Rehberg	Contact person email: srehberg@migcom.com	Contact person phone: 503-227-3678	
Contact person mailing address: 506 SW 6th Avenue, Suite 400	City: Portland	State: OR	ZIP: 97204

PROPOSAL	
Brief description of proposal: Remove Historic Landmark Overlay from Carus Elementary School property	Pre-application conference file number: ZPAC0112-21

SITE INFORMATION		
Site address: 14412 South Carus Road, Oregon City, OR 97045	Comprehensive Plan designation: R	Zoning district: RRFF-5
Map and tax lot #: Township: <u>3S</u> Range: <u>2E</u> Section: <u>33B</u> Tax Lot: <u>600</u> Township: <u>3S</u> Range: <u>2E</u> Section: <u>33B</u> Tax Lot: <u>700</u> Township: _____ Range: _____ Section: _____ Tax Lot: _____	Land area: ~4.63 acres (whole school site)	
Adjacent properties under same ownership: Township: _____ Range: _____ Section: _____ Tax Lot: _____ Township: _____ Range: _____ Section: _____ Tax Lot: _____		

Printed names of all property owners: Denise Lapp, Canby School District	Signatures of all property owners: 	Date(s): 11/18/22
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I hereby certify that the statements contained herein, along with the evidence submitted, are in all respects true and correct to the best of my knowledge.

Applicant signature: Date: 11/18/22

A. Complete a pre-application conference:

You must attend a pre-application conference with Planning and Zoning staff before filing this application. [Information about the pre-application conference](#) process and a request form are available from the Planning and Zoning website.

B. Review applicable land use rules:

This application is subject to the provisions of [Section 1202, Zone Changes](#) of the [Clackamas County Zoning and Development Ordinance](#) (ZDO).

It is also subject to the ZDO's definitions, procedures, and other general provisions, as well as to the specific rules of the subject property's zoning district and applicable development standards, as outlined in the ZDO.

C. Turn in all of the following:

- Complete application form:** Respond to all the questions and requests in this application, and make sure all owners of the subject property sign the first page of this application. Applications without the signatures of *all* property owners are incomplete.

n/a - **Application fee:** The cost of this application is **\$6,340 if it is filed concurrently with another land use application for the same property** or **\$6,890 if it is filed alone**. A \$150 notification surcharge also applies if an expanded notification area is required by ZDO Section 1307. Payment can be made by cash, by check payable to "Clackamas County", or by credit/debit card with an additional card processing fee using the [Credit Card Authorization Form](#) available from the Planning and Zoning website. Payment is due when the application is submitted. Refer to the FAQs at the end of this form and to the adopted [Fee Schedule](#) for refund policies.

- Vicinity map:** Provide a map of the area around the property, drawn to scale, that shows the uses and location of improvements on adjacent properties and properties across any road.

- Site plan:** Provide a site plan (also called a plot plan). A [Site Plan Sample](#) is available from the Planning and Zoning website. The site plan must be accurate and drawn to-scale on paper measuring no larger than 11 inches x 17 inches. The site plan must illustrate all of the following (when applicable):

- Lot lines, lot/parcel numbers, and acreage/square footage of lots, and contiguous properties under the same ownership;
- All existing and proposed structures, fences, roads, driveways, parking areas, and easements, each with identifying labels and dimensions;
- Setbacks of all structures from lot lines and easements;
- Significant natural features (rivers, streams, wetlands, slopes of 20% or greater, geologic hazards, mature trees or forested areas, drainage areas, etc.); and
- Location of utilities, wells, and all onsite wastewater treatment facilities (e.g., septic tanks, septic drainfield areas, replacement drainfield areas, drywells).

n/a - **Service Feasibility Determinations:** Request that the property's water provider, sanitary sewer provider, and surface water management authority, as applicable, each complete a [Preliminary Statement of Feasibility](#) and include those completed statements with your application. If the proposed development will be served by an onsite wastewater treatment system (e.g., a septic system), include an approved Site Evaluation or Authorization Notice from the [Septic & Onsite Wastewater Program](#) attesting to the feasibility of your proposal.

n/a - **Transportation impact study:** Refer to the information provided at the pre-application conference regarding the need for a transportation impact study. Include a copy of any required study with your application submittal.

Any additional information or documents advised of during the pre-application conference

D. Answer the following questions:

1. What zoning district designation are you requesting for the subject property?

Requested zoning district: _____

2. If the zoning designation you requested in response to Question 1 cannot be approved because the property doesn't meet the approval criteria, would you like an alternate zoning district designation to be considered?

NO

YES, and the alternate zoning district designation(s) I would like is/are:

3. Are you filing this zone change application with another application?

NO, this application is being filed alone.

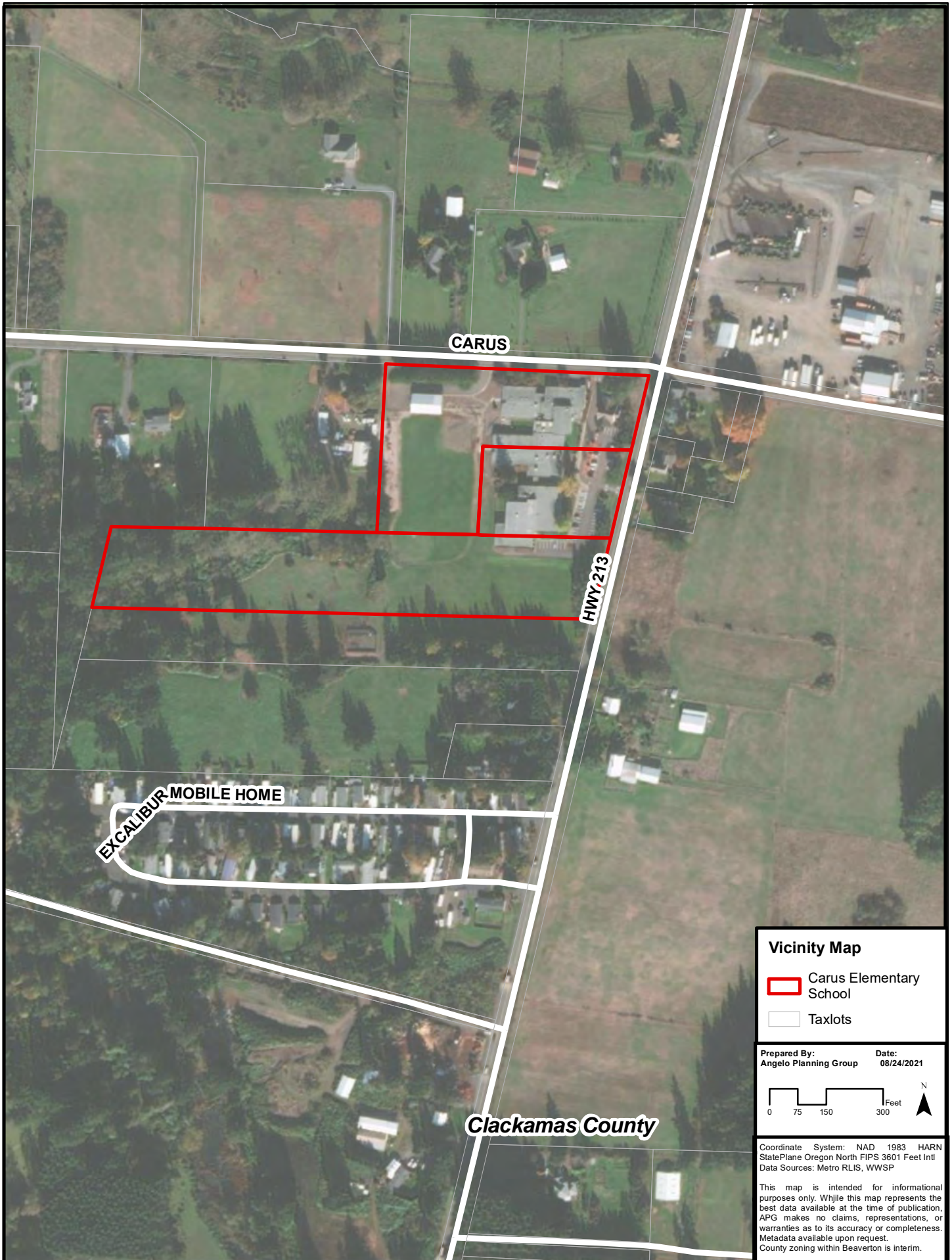
YES, this application is being filed with another application. That other application requests the following:

E. Respond in a narrative:

- PLEASE SEE ATTACHED NARRATIVE RESPONSES -

Your application submittal must include a narrative that fully responds to the following. Due to the technical nature of these requirements, guidance on how best to respond will be provided during the required pre-application conference.

1. How is the proposed zone change consistent with the applicable goals and policies of the County's [Comprehensive Plan](#)?
2. If development under the proposed zone would need public services (sanitary sewer, surface water management, and water), could the need be accommodated with the implementation of the applicable service provider's existing capital improvement plan? The cumulative impact of the proposed zone change and development of other properties under existing zoning designations must be considered.
3. Explain how the transportation system is adequate and will remain adequate with approval of the proposed zone change. This explanation should take into consideration the following:
 - a. "Adequate" means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, *Motor Vehicle Capacity Evaluation Standards for the Urban Area*, and 5-2b, *Motor Vehicle Capacity Evaluation Standards for the Rural Area*.
 - b. Conduct the evaluation of transportation system adequacy pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).
 - c. Assume that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.
 - d. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.
 - e. The adequacy standards apply to all roadways and intersections within the impact area of the proposed zone change. The impact area is identified based on the Clackamas County Roadway Standards.
 - f. A determination of whether submittal of a transportation impact study is required is made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.
 - g. (d) through (f) above do not apply to roadways and intersections under the jurisdiction of the State of Oregon. Instead, motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODOT Transportation Analysis Procedures Manual for such roadways and intersections.
4. Explain how the safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.





CARUS

HWY 213

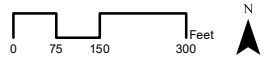
EXCALIBUR MOBILE HOME

Clackamas County

Vicinity Map

-  Carus Elementary School
-  Taxlots

Prepared By: Angelo Planning Group Date: 08/24/2021

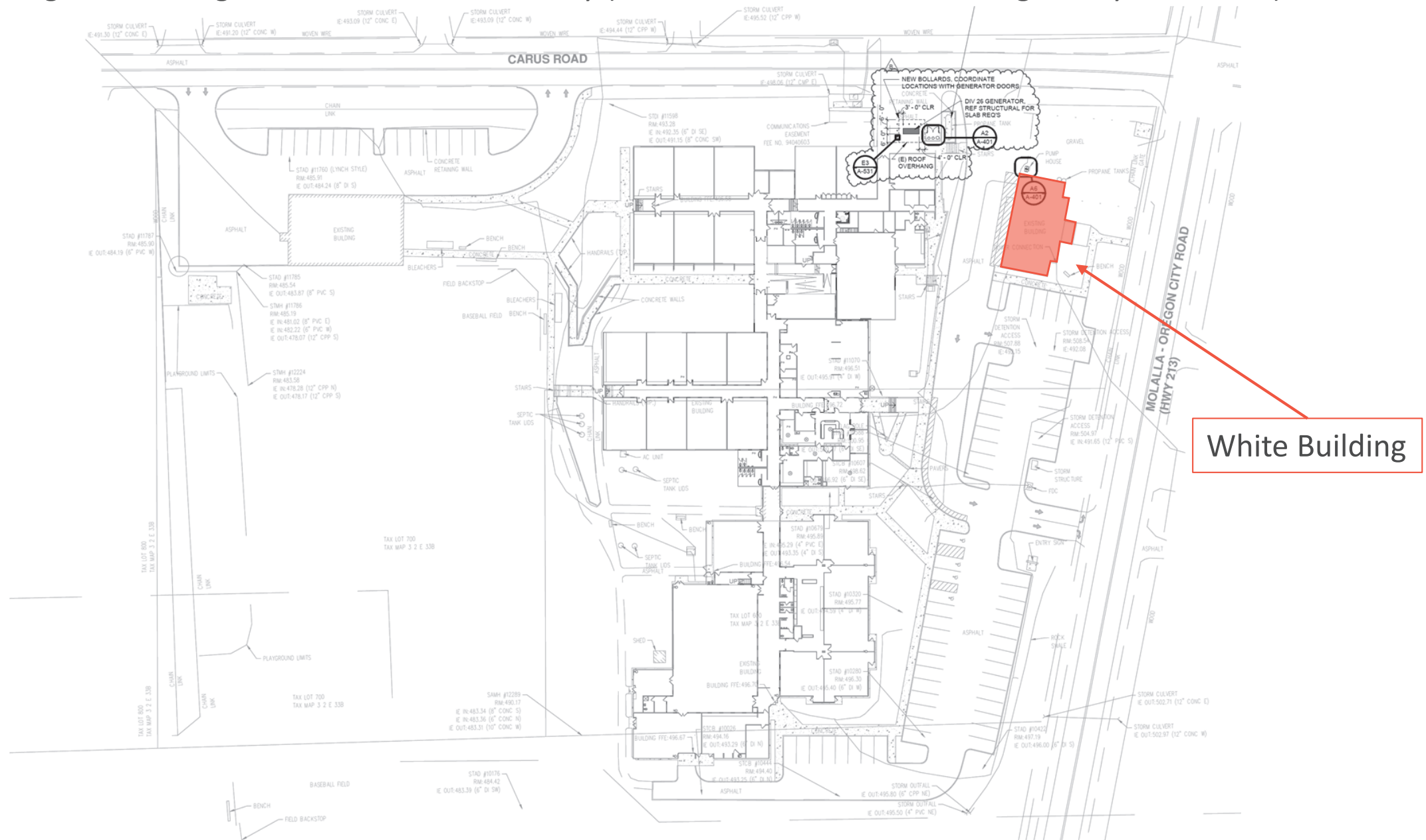


Coordinate System: NAD 1983 HARN
StatePlane Oregon North FIPS 3601 Feet Int
Data Sources: Metro RLIS, WWSP

This map is intended for informational purposes only. While this map represents the best data available at the time of publication, APG makes no claims, representations, or warranties as to its accuracy or completeness. Metadata available upon request. County zoning within Beaverton is interim.

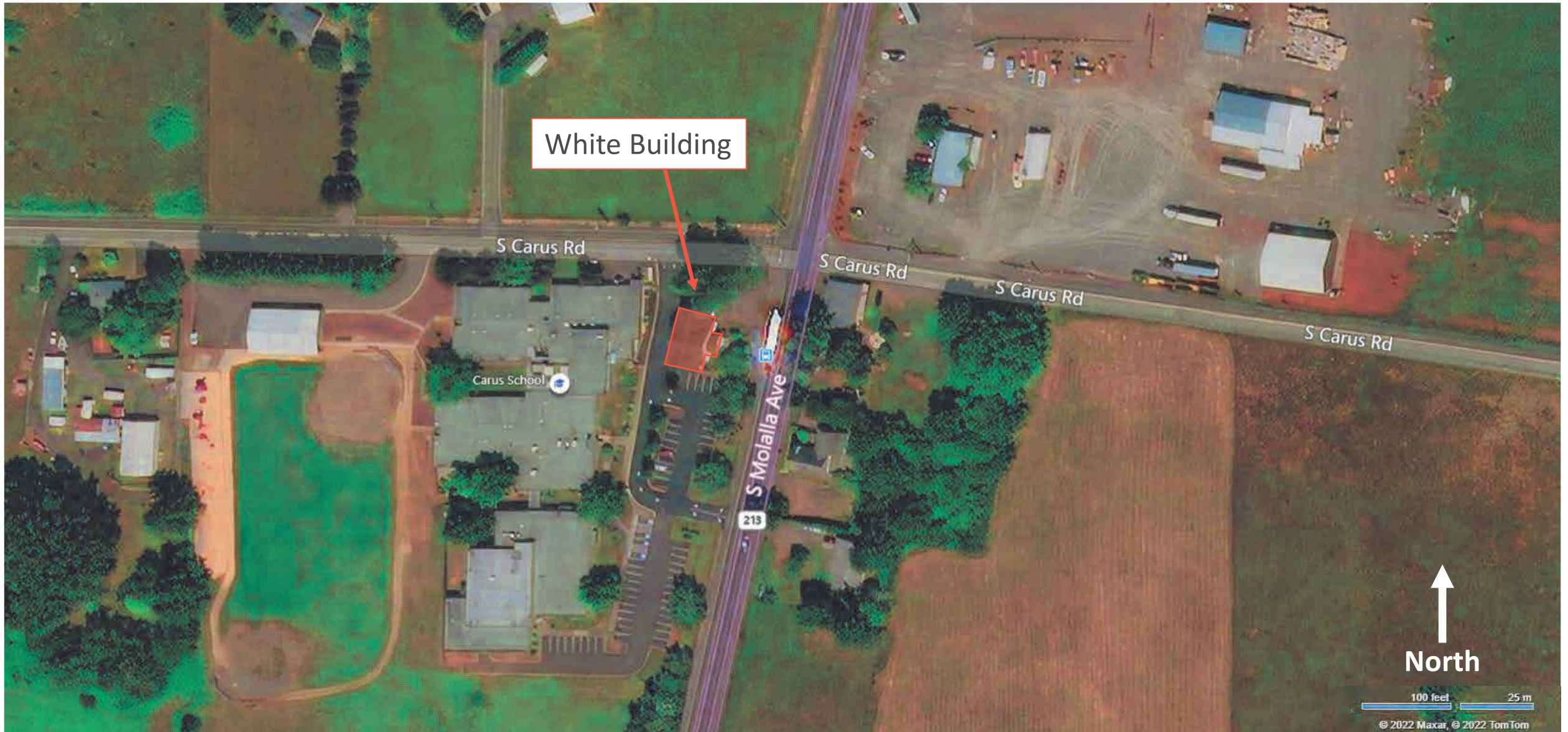
Existing Site Plan

White Building and Existing Historic Landmark Overlay (14412 South Carus Road, Oregon City, OR 97045)



Existing Site Plan

White Building and Existing Historic Landmark Overlay (14412 South Carus Road, Oregon City, OR 97045)





Carus Elementary School Zone Change

Narrative

Prepared for Canby School District



Prepared by MIG|APG

Submitted to Clackamas County, Current Planning

November 18, 2022

1202 ZONE CHANGES

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DEC 12 2022

Clackamas County
Planning & Zoning Division

IMPORTANT

Your application will be deemed complete, if, within 180 days of the date the application was first submitted, Planning and Zoning receives one of the following:

1. All of the missing information; or
2. Some of the missing information and written notice from you (the applicant) that no other information will be provided; or
3. Written notice from you (the applicant) that none of the missing information will be provided.

If any one of these options is chosen within 180 days of the date of the initial submittal, approval or denial of your application will be subject to the relevant criteria in effect on the date the application was first submitted.

Your application will be considered void if, on the 181st day after the date the application was first submitted, you have been mailed this notice and have not provided the information requested in Options 1-3 above. In this case, no further action will be taken on your application.

Applicant or authorized representative, please check one of the following and return this notice to: **Clackamas County Planning and Zoning, 150 Beaver Creek Road, Oregon City, OR, 97045**

- I am submitting the required information (attached); or
- I am submitting some of the information requested (attached) and no other information will be submitted; or
- I will not be submitting the requested information. Please accept the application as submitted for review and decision.

Shayna Rehberg
Signed

Shayna Rehberg
Print Name

12/12/22
Date



**Clackamas County Planning and Zoning
Department of Transportation and Development**

Development Services Building
150 Beavercreek Road | Oregon City, OR 97045

503-742-4500 | zoninginfo@clackamas.us
www.clackamas.us/planning

NOTICE OF INCOMPLETE TYPE II OR III LAND USE APPLICATION

FILE NUMBER: Z0542-22
APPLICATION TYPE: Zone Change
APPLICANT NAME: Denise Lapp
SITE ADDRESS: 14412 S CARUS RD, OREGON CITY, OR 97045
STAFF CONTACT: Joy Fields EMAIL: jfields@clackamas.us
DATE OF APPLICATION SUBMITTAL: November 21, 2022
DATE DEEMED INCOMPLETE: 12/6/22
DATE OF MAILING OF THIS NOTICE: 12/6/22
DEADLINE FOR SUBMITTAL OF MISSING INFORMATION: 6/5/23

Your Type II or III land use application has been deemed **incomplete**. Pursuant to Subsection 1307.07(E) of the Clackamas County Zoning and Development Ordinance, your application will be void unless the missing information is submitted within 180 days of the date the application was first submitted. Upon voiding of an application, 75 percent of your application fee will be refunded, and you will need to reapply if you are still interested in obtaining this permit.

MISSING INFORMATION REQUIRED FOR A COMPLETE APPLICATION:

- A. The Clackamas County Comprehensive Plan has goals and policies related to Historic Sites. While your application highlights the traffic safety goals of the Comprehensive Plan, you are proposing to remove the Historic Landmark Zoning Overlay for a Historic Site so the Historic Site goals and policies apply to the application. Please review Chapter 9 of the Comprehensive Plan and provide narrative regarding how the zone change application relates to the Historic Sites goals and policies of the Comprehensive Plan. The Comprehensive Plan is available for viewing here:
<https://www.clackamas.us/planning/comprehensive.html>.



Carus Elementary School Zone Change

Narrative

Prepared for Canby School District



Prepared by MIG | APG

Submitted to Clackamas County, Current Planning

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A. How is the proposed zone change consistent with the applicable goals and policies of the County's Comprehensive Plan?

Response: The removal of the White Building and corresponding Historic Landmark Overlay on the Carus Elementary School site will allow for significant planned on-site vehicle circulation improvements. The current vehicle access to and circulation within Carus Elementary School causes back-up on South Carus Road, a serious safety hazard.

One of the County's goals is to improve the safety of its system for all users and reduce the number and severity of crashes for future years, consistent with Chapter 5 of the County Comprehensive Plan and Road Safety Policies (Section 5.B). Developing facilities to accommodate all modes of travel will help reduce conflicts that lead to safety problems for some users. The adopted Transportation Safety Action Plan calls for a 50 percent reduction of fatal and serious injury crashes by 2022.

Chapter 9 of the County's Comprehensive Plan includes Historic Landmarks, Districts, and Transportation Corridors Policies (Section 9.C). In particular, Policy 9.C.4 addresses zoning a property Historic Landmark (HL) when "determined significant by the evaluation criteria." The White Building was designated a Historic Landmark in 1990; as part of a 0.78-acre area on the Carus Elementary School site, it was zoned with a Historic Landmark Overlay, pursuant to approval of Z1293-90-Z (HL).

Upon approval of the proposed Historic Landmark Removal or Demolition for the White Building (Z0523-22-HR), the proposed zone change will ~~also~~ be consistent with the Comprehensive Plan because there will no longer be an Historic Landmark on the Carus Elementary School Site to which to apply the Historic Landmark existing eOverlay zone.

B. If development under the proposed zone would need public services (sanitary sewer, surface water management, and water), could the need be accommodated with the implementation of the applicable service provider's existing capital improvement plan? The cumulative impact of the proposed zone

change and development of other properties under existing zoning designations must be considered.

Response: The Historic Landmark Overlay applies only to the area of the White Building on the Carus Elementary School site. Its removal and development that could then occur pursuant to the underlying RRF-5 zoning is so minimal as to constitute no substantial difference in public service needs. Consequently, the development could be accommodated under existing capital improvement plans.

C. Explain how the transportation system is adequate and will remain adequate with approval of the proposed zone change. This explanation should take into consideration the following:

1. "Adequate" means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, Motor Vehicle Capacity Evaluation Standards for the Urban Area, and 5-2b, Motor Vehicle Capacity Evaluation Standards for the Rural Area.

2. Conduct the evaluation of transportation system adequacy pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).

3. Assume that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.

4. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.

5. The adequacy standards apply to all roadways and intersections within the impact area of the proposed zone change. The impact area is identified based on the Clackamas County Roadway Standards.

6. A determination of whether submittal of a transportation impact study is required is made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.

7. Notwithstanding Subsections 1202.03(C)(4) through (6), motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODOT Transportation Analysis Procedures Manual for roadways and intersections under the jurisdiction of the State of Oregon.

Response: The Historic Landmark Overlay applies only to the area of the White Building on the Carus Elementary School site. Its removal and development that could then occur pursuant to the underlying RRF-5 zoning is so minimal as to constitute no substantial difference in transportation system impacts and needs.

D. Explain how the safety of the transportation system is adequate to serve the level of development

anticipated by the proposed zone change.

Response: Currently, vehicle access to and circulation within Carus Elementary School backs up on South Carus Road, a serious safety hazard. The removal of the White Building and the corresponding Historic Landmark Overlay on the Carus Elementary School site will allow for significant on-site vehicle circulation improvements. Thus, the proposed zone change will facilitate safer transportation system conditions.



Carus Elementary School Zone Change

Narrative

Prepared for Canby School District



Prepared by MIG | APG

Submitted to Clackamas County, Current Planning

Originally submitted: November 18, 2022 | Revisions submitted: December 12, 2022

1202 ZONE CHANGES

1202.01 PURPOSE AND APPLICABILITY

Section 1202 is adopted to provide standards, criteria, and procedures under which a change to the zoning maps (hereinafter referred to as a zone change) may be approved.

1202.03 GENERAL APPROVAL CRITERIA

A zone change requires review as a Type III or IV application pursuant to Section 1307, Procedures, and shall be subject to the following standards and criteria:

A. How is the proposed zone change consistent with the applicable goals and policies of the County's Comprehensive Plan?

Response: The removal of the White Building and corresponding Historic Landmark Overlay on the Carus Elementary School site will allow for significant planned on-site vehicle circulation improvements. The current vehicle access to and circulation within Carus Elementary School causes back-up on South Carus Road, a serious safety hazard.

One of the County's goals is to improve the safety of its system for all users and reduce the number and severity of crashes for future years, consistent with Chapter 5 of the County Comprehensive Plan and Road Safety Policies (Section 5.B). Developing facilities to accommodate all modes of travel will help reduce conflicts that lead to safety problems for some users. The adopted Transportation Safety Action Plan calls for a 50 percent reduction of fatal and serious injury crashes by 2022.

Chapter 9 of the County's Comprehensive Plan includes Historic Landmarks, Districts, and Transportation Corridors Policies (Section 9.C). In particular, Policy 9.C.4 addresses zoning a property Historic Landmark (HL) when "determined significant by the evaluation criteria." The White Building was designated a Historic Landmark in 1990; as part of a 0.78-acre area on the Carus Elementary School site, it was zoned with a Historic Landmark Overlay, pursuant to approval of Z1293-90-Z (HL).

Upon approval of the proposed Historic Landmark Removal or Demolition for the White Building (Z0523-22-HR), the proposed zone change will be consistent with the Comprehensive Plan because there will no longer be an Historic Landmark on the Carus Elementary School Site to which to apply the Historic Landmark Overlay zone.

B. If development under the proposed zone would need public services (sanitary sewer, surface water management, and water), could the need be accommodated with the implementation of the applicable service provider's existing capital improvement plan? The cumulative impact of the proposed zone change and development of other properties under existing zoning designations must be considered.

Response: The Historic Landmark Overlay applies only to the area of the White Building on the Carus Elementary School site. Its removal and development that could then occur pursuant to the underlying RRF-5 zoning is so minimal as to constitute no substantial difference in public service needs. Consequently, the development could be accommodated under existing capital improvement plans.

C. Explain how the transportation system is adequate and will remain adequate with approval of the proposed zone change. This explanation should take into consideration the following:

- 1. "Adequate" means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a, Motor Vehicle Capacity Evaluation Standards for the Urban Area, and 5-2b, Motor Vehicle Capacity Evaluation Standards for the Rural Area.*
- 2. Conduct the evaluation of transportation system adequacy pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).*
- 3. Assume that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.*
- 4. The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.*
- 5. The adequacy standards apply to all roadways and intersections within the impact area of the proposed zone change. The impact area is identified based on the Clackamas County Roadway Standards.*
- 6. A determination of whether submittal of a transportation impact study is required is made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.*
- 7. Notwithstanding Subsections 1202.03(C)(4) through (6), motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODOT Transportation Analysis Procedures Manual for roadways and intersections under the jurisdiction of the State of Oregon.*

Response: The Historic Landmark Overlay applies only to the area of the White Building on the Carus Elementary School site. Its removal and development that could then occur pursuant to the underlying RRF-5 zoning is so minimal as to constitute no substantial difference in transportation system impacts and needs.

D. Explain how the safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.

Response: Currently, vehicle access to and circulation within Carus Elementary School backs up on South Carus Road, a serious safety hazard. The removal of the White Building and the corresponding Historic Landmark Overlay on the Carus Elementary School site will allow for significant on-site vehicle circulation improvements. Thus, the proposed zone change will facilitate safer transportation system conditions.