



NOTICE OF DECISION ON A TYPE II LAND USE PERMIT

Decision: Approved with Conditions

Permit Type: Modification

File No. Z0436-23

Applicant's Proposal: The applicant is requesting to modify Conditional Use applications Z0160-09 and Z0351-02 to use a portion of the current building for parochial school uses. The applicant proposes a phased approach to opening the school use with the maximum number of 150 students using the existing building and parking areas. No expansion of the building is proposed.

Decision Date: December 9, 2024

Deadline for Filing Appeal: December 23, 2024, at 4:00 pm.

Issued By: Joy Fields, Principal Planner, jfields@clackamas.us, 503-742-4510

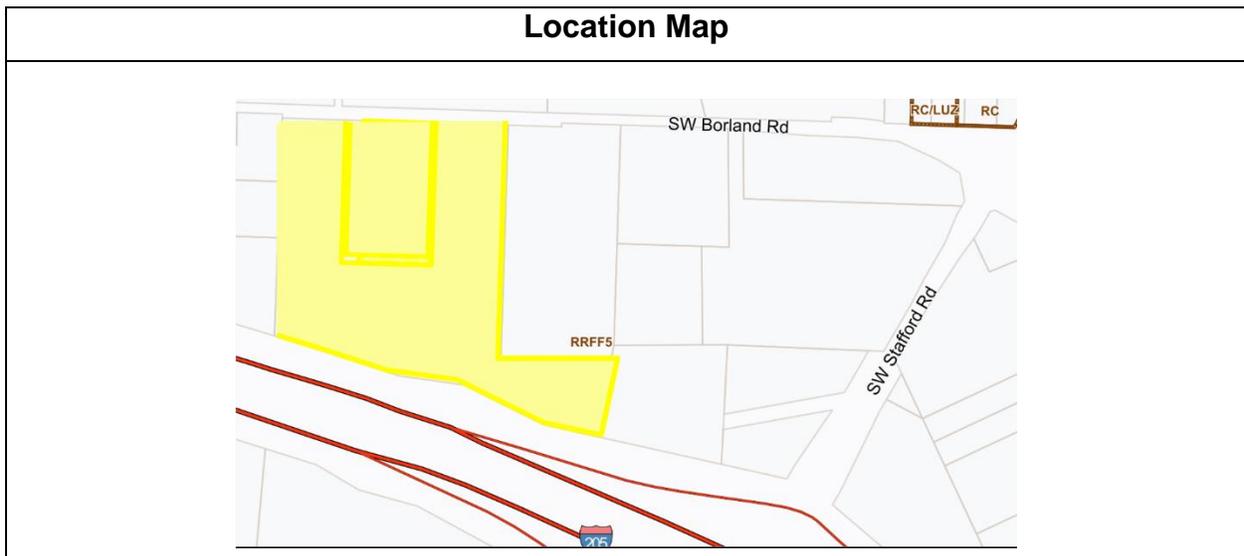
Applicant: Marc Huchette

Owner of Property: Rolling Hills Community Church

Zoning: RFFF-5

Assessor's Map & Tax Lot(s): T02S R01E Section 29A Tax Lot(s) 500, 600, and 602, along with 601E1 and 500E1.

Site Address: 3550 SW BORLAND RD, Tualatin, 97062



Community Planning Organization (CPO) for Area:

Stafford-Tualatin Valley: Randall Yamada yamada2@mindspring.com and staffordcpo@gmail.com

Community Planning Organizations (CPOs) are part of the county's community involvement program. They are advisory to the Board of County Commissioners, Planning Commission and Planning and Zoning Division on land use matters affecting their communities. CPOs are notified of proposed land use actions and decisions on land within their boundaries and may review these applications, provide recommendations or file appeals. If this CPO currently is inactive and you are interested in becoming involved in land use planning in your area, please contact Clackamas County Community Engagement at 503-655-8751.

Opportunity to Review the Record and Decision: The complete decision, including findings and conditions of approval, and the submitted application are available for review online at <https://accela.clackamas.us/citizenaccess/>. Select the **Planning** tab and enter the file number to search. Select **Record Info** and then select **Attachments** from the dropdown list, where you will find the submitted application. A copy of the decision, application, all documents and evidence submitted by or on behalf of the applicant, and applicable criteria are available for inspection at no cost by contacting the Planner listed above. Copies of all documents may be purchased at a cost established by the County fee schedule.

Appeal Rights: **This decision will not become final or effective until the period for filing an appeal with the County has expired without the filing of an appeal.** Any person who is adversely affected or aggrieved or who is entitled to written notice of the decision pursuant to Subsection 1307.09(C) of the Clackamas County Zoning and Development Ordinance may appeal this decision to the Clackamas County Land Use Hearings Officer by filing a written appeal. An appeal must include a completed Appeal Form available at www.clackamas.us/planning/supplemental.html and a \$250.00 filing fee and must be **received** by the Planning and Zoning Division by the appeal deadline identified above.

Appeals may be submitted in person during office hours (8:00 am to 4:00 pm Monday through Thursday, closed Friday and holidays). Appeals may also be submitted by email or US mail.

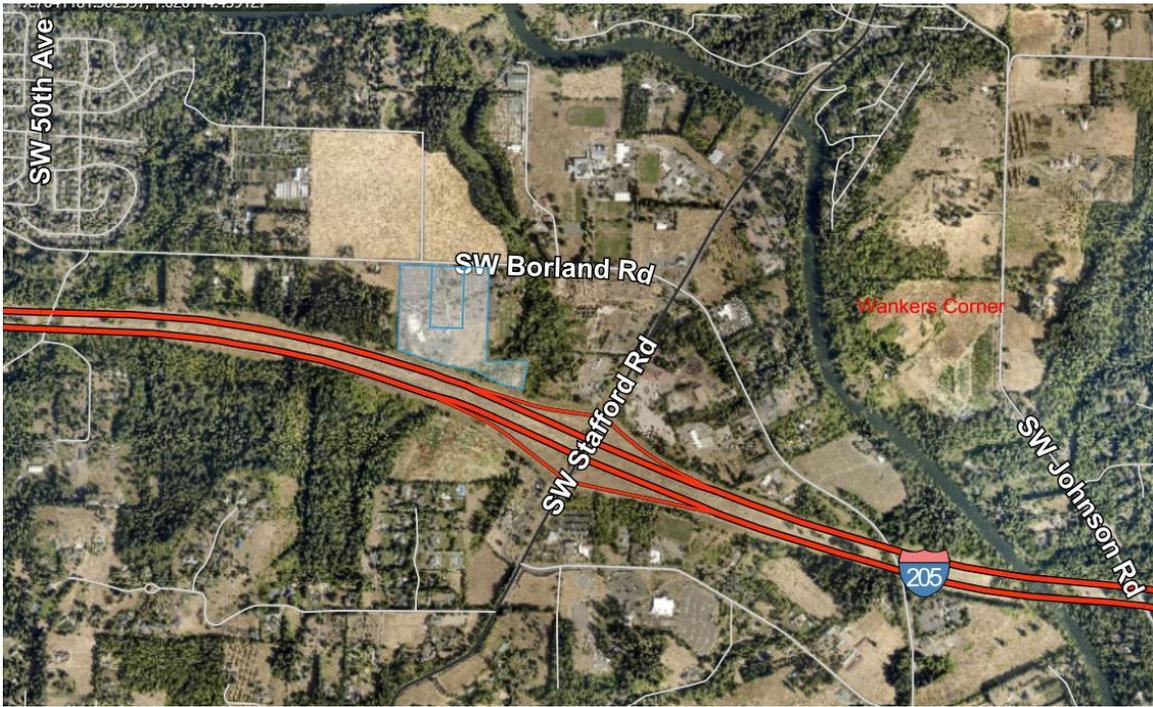
A person who is mailed written notice of this decision cannot appeal this decision directly to the Land Use Board of Appeals under ORS 197.830.

NOTICE TO MORTGAGEE, LIENHOLDER, VENDOR OR SELLER: ORS CHAPTER 215 REQUIRES THAT IF YOU RECEIVE THIS NOTICE, IT MUST PROMPTLY BE FORWARDED TO THE PURCHASER.

Clackamas County is committed to providing meaningful access and will make reasonable accommodations, modifications, or provide translation, interpretation or other services upon request. Please contact us at 503-742-4545 or email DRenhard@clackamas.us.

503-742-4545: ¿Traducción e interpretación? | Требуется ли вам устный или письменный перевод? | 翻译或口译? | Cần Biên dịch hoặc Phiên dịch? | 번역 또는 통?

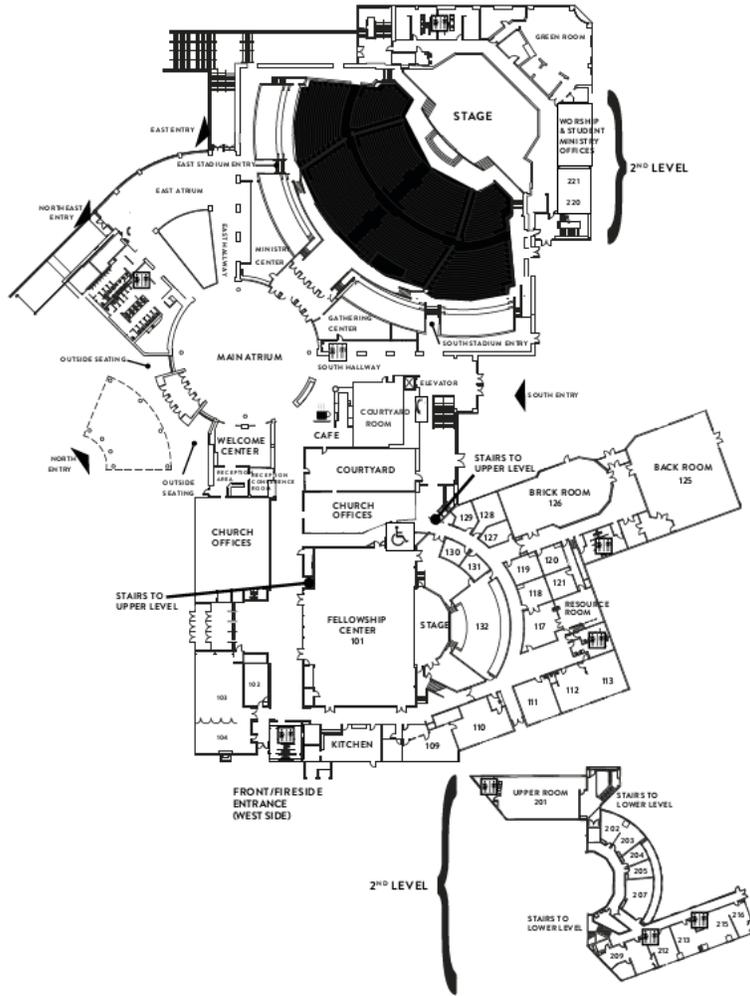
Location Map



Traffic Analysis Site Plan



Floor Plan



Site Plan



CONDITIONS OF APPROVAL

The conditions listed are necessary to ensure that approval criteria for this land use permit are satisfied. Where a condition relates to a specific approval criterion, the code citation for that criterion follows in parentheses.

1. Approval of this land use permit is based on the submitted written narrative and plan(s) filed with the County on November 7, 2023 and additional documents submitted on May 1, 2024, May 14, 2024 and November 20, 2024. No work shall occur under this permit other than which is specified within these documents, unless otherwise required or specified in the conditions below. It shall be the

responsibility of the property owner(s) to comply with these documents and the limitation of any approval resulting from the decision described herein.

2. The proposed parochial school use and must stay within the water usage limits set under ORS 537.545.b.
3. The proposed school use will be limited to using the existing access drives connected to SW Borland Rd.. ZDO 1007.01 and 1309.01.
4. Provide a site plan and/or pictures documenting that there are at least 6.4 bicycle parking spaces available on site for the school use. ZDO 1015.03.7

APPLICABLE APPROVAL CRITERIA

This application is subject to Clackamas County Zoning and Development Ordinance (ZDO) 316, 1000s, 1307, and 1309.

PUBLIC AND AGENCY COMMENTS

Notice was sent to applicable agencies and owners of property within 500 feet. Comments received relating to the applicable approval criteria listed above are addressed in the Findings Section. Comments from the following were received:

- Two members of the public
- Transportation and Engineering Program, Ken Kent and Christian Snuffin
- Oregon Water Resources Department District 18 Watermaster

FINDINGS

The findings below identify the standards and criteria that are relevant to this decision, state the facts relied upon in rendering the decision, and explain the justification for the decision.

1. Background/Overview of Applicant's Proposal:

The site is located on the south side of SW Borland Rd, west of the Borland Road/Stafford Road intersection and north of the I-205 Freeway. The site is relatively flat with steeper slopes located around the regulated stream and habitat conservation area that crosses the southeast corner of tax lot 500 and 600. The existing development expansion from the early 2000s occurred with protections for the natural habitat and stream ecosystems.

The applicant originally proposed to use the existing structure and outside play areas to provide preschool and ultimately school services for up to 305 students and about 45 staff. After the traffic impact analysis, the applicant modified the proposal to use the

existing structure and outside play areas for a K-5 parochial school with no additional daycare or preschool services. Future addition of daycare and preschool services will require additional land use review.

The subject property and existing development went through a Conditional Use application and approval in 2002 and 2009 to expand the church building and the use to their current intensity. File number Z0351-02 was the original approval by the Hearings Officer for the expansion of the church. Z0160-09 was for the re-approval of phase 3 and 4 of the church expansion. The applicant is proposing to modify both of those previous decisions to be able to use the existing classrooms, kitchen, gym, auditorium, rooms, and grounds for up to 150 children for Kindergarten through 5th grade as Phase I. Additional land use review would be required for serving additional children in Phase II. While the previous Conditional Use applications were accompanied by Design Review application Z0845-02, the applicant is not proposing any outside modifications to the structure, parking, or grounds and thus a separate Design Review is not required to use the existing site development for 150 K-5 parochial school uses.

2. ZDO Section 316, Rural Residential Farm Forest 5-Acre (RRFF-5)

Section 316 regulates the Rural Residential Farm and Forest 5-Acre (RRFF-5) district, which includes the subject property. Table 316-1 identifies Schools as a Conditional Use subject to Section 805. In Section 805, the only standard is that the minimum side setback for a school is 25 feet. This application is for a modification of a previously approved Conditional Use. An application for a modification of a previously approved Conditional Use approval, is subject to Section 1309 pursuant to ZDO 1307 Procedures.

Finding: The proposed use is a modification of a previously approved Conditional Use in the RRFF-5 Zoning District. The setbacks for schools in ZDO 805 are met. However, as a modification of a prior land use decision, the application is being reviewed pursuant to ZDO Section 1309. **This criterion is met.**

3. ZDO Section 1309, Modification

1309.01 APPROVAL CRITERIA

A modification to an approved Type II or III land use permit, or conditions thereto, requires review as a Type II application pursuant to Section 1307, Procedures, and shall be subject to the following standards and criteria:

A. A modification shall be consistent with the prior approval;

Finding: The applicant is proposing to modify the use of the church building approved for expansion through Conditional Use applications including Z0351-02 and Z0160-09. The proposed use of the existing church building and grounds for a school use is consistent with the prior approval because the footprint of the building and the amount of development on site will stay the same. While there will be more use of the building during the day Monday-Friday, the applicant

indicates that in the early 2000s there was more use of the building and the addition of the school use will bring the total visitor number up to, or close to, what the site previously supported.

The Traffic Impact Statement (TIS) concludes that the transportation system is adequate to accommodate the proposed development, and it does not recommend any mitigation measures. Therefore, the traffic generated from a K-5 parochial school, using the existing driveways on SW Borland Rd is consistent with the prior land use approval.

Additionally, ZDO 202 defines Institutional Use as: "The use of land and/or structures for activities such as child care, adult daycare and pre-school facilities, public and private schools, colleges, universities, art, music, trade and other educational and training facilities, convalescent care facilities, nursing homes, hospitals, places of worship, fraternal lodges, municipal and civic buildings, transit centers and park-and-ride facilities, parks, swimming pools and other recreational facilities open to the public or a membership group, senior and community centers, libraries, museums, cemeteries and mausoleums, utility facilities, and similar public and private uses". Therefore, places of worship and schools are both considered institutional use and thus the proposed modification of the site for institutional use during the day is consistent with prior approvals.

This criterion is met.

B. A modification shall be consistent with all Ordinance provisions in effect on the date the modification request is submitted; and

Finding: In addition to Section 1309 of the Zoning and Development Ordinance (ZDO), this application involves the modification to an institutional use and site improvements that have to meet the Development Standards in ZDO Sections 1002, 1003, 1004, 1005, 1006, 1007, 1009, 1010, 1011, 1015, and 1021, according to Table 1001-1 that identifies the applicable sections for different uses. The applicant addresses these sections in the application materials and staff will consider each section below:

1002 PROTECTION OF NATURAL FEATURES- Finding: The applicant provided narrative and a site plan that identifies that there is no expansion of the building and no additional impervious surface proposed. Therefore, there is no impact to natural features proposed. The applicant indicated this section was not applicable. Staff have reviewed the natural features on the site and find that there is no impact to natural features from the use of existing developed structures, playgrounds, drive aisles and parking. **These criterion are met.**

1003 HAZARDS TO SAFETY – Finding: The subject properties does contain a very small area of mapped mass movement hazards on the southeastern corner approximately 450 feet from the existing parking areas. However, as the applicant indicated in the narrative, there is no expansion of the building and no site development proposed. Therefore, there would be no impact to these mapped landslide mass movement hazards. There are no steep slopes, or hydrologic hazards that would impact the proposed development. The applicant

indicated this section was not applicable and staff concur. **These criterion are met.**

1004 HISTORIC PROTECTION - Finding: The subject property has no known historic resources or historic landmarks on site. Therefore, the proposed modification of the use in the existing development, does not impact any known historic resources. **These criterion are met.**

1005 SITE AND BUILDING DESIGN Finding: There are no exterior changes proposed for the existing building. Additionally, the proposed development involves no site development. **Therefore, the sections of 1005 are not applicable.**

1006 Utilities, Street Lights, Water Supply, Sewage Disposal, Surface Water Management, And Erosion Control –

Finding: The subject property is not inside the Portland Urban Growth Boundary and the proposed development is for changing the use of the existing improvements. Therefore, the Sections of 1006 that apply only to properties inside the UGB, Water Supply, and Sewage Disposal are not applicable to this application. No public water usage is proposed. The applicant provided documentation that they have the capacity to use water for the proposed use and must stay within the limits set under ORS 537.545. Since there is no ground work or additional impervious surface, the Surface Water Management and Erosion Control sections of the ZDO are not applicable.

The applicant provided a preliminary statement of feasibility from the Oregon Water Resources Department as part of their application submission. **These criterion are met.**

1007 Roads and Connectivity.

1007.01 GENERAL PROVISIONS

A. The location, alignment, design, grade, width, and capacity of all roads shall be planned, coordinated, and controlled by the Department of Transportation and Development and shall conform to Section 1007, Chapters 5 and 10 of the Comprehensive Plan, and the Clackamas County Roadway Standards. Where conflicts occur between Section 1007, the Comprehensive Plan, and the Clackamas County Roadway Standards, the Comprehensive Plan shall control.

D. Street alignments, intersections, and centerline deflection angles shall be designed according to the standards set forth in Chapters 5 and 10 of the Comprehensive Plan and the Clackamas County Roadway Standards.

Finding: The subject site is zoned RRFF-5 and is located outside of the UGB. The proposal is for a new use but no new site development. Therefore, new roads and driveways are not proposed or considered in this decision. In the development proposal, there are no modifications to approaches to public and county roads. The applicant also proposed to use the existing driveways onto SW Borland and those were used in traffic impact study by Lancaster Mobley that found:

“The impacts of the proposed K-5 school, located at the existing Rolling Hills Community Church facility, to the existing transportation system within the site vicinity are expected to be minimal.”

“The new site trips are not expected to significantly alter the operation or safety of the existing transportation facilities.”

Additionally no change is proposed for the location, alignment, design, grade, width, or capacity of adjacent roads. Based on the traffic analysis and the proposal to use the existing parking and access drives **these criterion are met.**

E. All roads shall be designed and constructed to adequately and safely accommodate vehicles, pedestrians, and bicycles according to Chapters 5 and 10 of the Comprehensive Plan and the Clackamas County Roadway Standards. Development-related roadway adequacy and safety impacts to roadways shall be evaluated pursuant to the Clackamas County Roadway Standards and also to Oregon Department of Transportation standards for state highways.

F. Roadways shall be designed to accommodate transit services where transit service is existing or planned and to provide for the separation of motor vehicles, bicycle, and pedestrian traffic, and other modes as appropriate.

G. The needs of all modes of transportation shall be balanced to provide for safe and efficient flow of traffic. Where practical, pedestrian crossing lengths shall be minimized and the road system shall be designed to provide frequent pedestrian connections.

Finding: There are no new roads proposed with this modification of existing development and the use is existing. Therefore these criterion are not applicable and are included here for informational purposes only.

1007.02 PUBLIC AND PRIVATE ROADWAYS

A. All roadways shall be developed according to the classifications, guidelines, tables, figures, and maps in Chapters 5 and 10 of the Comprehensive Plan and the provisions of the Clackamas County Roadway Standards.

B. The layout of new public and county roads shall provide for the continuation of roads within and between the development and adjoining developments when deemed necessary and feasible by the Department of Transportation and Development.

C. New county and public roads terminating in cul-de-sacs or other dead-end turnarounds are prohibited except where natural features (such as topography, streams, or wetlands), parks, dedicated open space, or existing development preclude road connections to adjacent properties, existing street stubs, or existing roads.

Finding: There are no new roads proposed with this modification. The previous land use reviews and decisions addressed frontage improvements, right of way dedication, and access drive. Transportation and Engineering Program staff indicated that a Traffic Impact Analysis was needed, but did not suggest other

improvements would be required. **Therefore, these criterion are not applicable and are included here for informational purposes only.**

D. Developments shall comply with the intersection sight distance and roadside clear zone standards of the Clackamas County Roadway Standards. In addition: 1. No planting, signing, or fencing shall be permitted which restricts motorists' vision; and 2. Curbside parking may be restricted along streets with visibility problems for motorists, pedestrians, and/or bicyclists as deemed appropriate by the Department of Transportation and Development.

Finding: The transportation impact study used the existing driveways that access SW Borland Rd and found no issues with queuing, turning, or capacity that warranted mitigation. **This criteria is met.**

E. New developments, subdivisions, and partitions may be required to dedicate land for right-of-way purposes and/or make road frontage improvements to existing rights-of-way, consistent with Section 1007, Chapters 5 and 10 of the Comprehensive Plan, and the Clackamas County Roadway Standards.

F. Road frontage improvements within the UGB and in Mt. Hood urban villages shall include

Finding: The proposal is a modification of the use to include up to 150 students and to provide school services at an existing church facility. The subject site is outside of the UGB and not in the Mt Hood urban villages. **Therefore these criterion are not applicable and are included here for informational purposes only.**

1007.03 PRIVATE ROADS AND ACCESS DRIVES A. Private roads and access drives shall be developed according to classifications and guidelines listed in Section 1007, Comprehensive Plan Figures 5-1 through 5-3, Typical Roadway Cross Sections, Chapters 5 and 10 of the Comprehensive Plan, and the Clackamas County Roadway Standards, except....

Finding: Neither of the adjacent roads are designated as scenic roads on Comprehensive Plan Map 5-1. The subject site is outside of the urban area and the area (known as Stafford/Tualatin Valley) is not identified in a Community or Design Plan in Chapter 10 of the Comprehensive Plan so there are no specific design standards for the road frontages. There are no new roads proposed with this modification of existing development and the institutional use is existing. **Therefore these criterion are not applicable and are included here for informational purposes only.**

1007.04 PEDESTRIAN AND BICYCLE FACILITIES – Finding: There are no trails, sidewalks or access ways proposed in the modification of the site. Borland Road is identified as a planned bicycle route on Map -2a of the Comprehensive Plan. Additional right of way was granted by the subject property owner when the church facilities were expanded through the 2002 Conditional Use approval. 2024 aerial images confirm that the frontage at the subject site includes wide shoulders that could be used by bicycles and a complete sidewalk along the road frontage of the subject site. Since there will be no change or reconstruction of the

roadway and since the existing institutional building is not being expanded, there is no requirement to build pedestrian or bicycle facilities pursuant to ZDO 1007.04 (C). Since there is no reconstruction or new construction of any street, the future planned bicycle route identified in the Comprehensive Plan are not applicable per 1007.04 (K). **Therefore these criterion are not applicable and are included here for informational purposes only.**

1007.05 TRANSIT AMENITIES – Finding: The subject site is served by Tri-met bus route 76 according to the Tri-met system map. Images captured by Google in 2024 show an existing bus stop at the subject site. There are no changes to the roads, road cross sections, road frontages, or site development. **Therefore these criterion are not applicable and are included here for informational purposes only.**

1007.06 STREET TREES and 1007.07 TRANSPORTATION FACILITIES CONCURRENCY -Finding: 1007.06 does not apply to the RRFF-5 land outside of the UGB. The proposed development is a modification of an existing developed site and 1007.07 does not apply. **These criterion are met.**

1009 Landscaping. Finding: The applicant is proposing no additional landscaping.

Table 1009-1 identifies that in the RRFF-5 Zoning District 25 percent of the site is to be landscaped for conditional uses with up to 15 percent of the minimum landscaped requirement allowed to be developed with pedestrian amenities that have an impervious surface. The applicant indicated no change would be made to the impervious area that consists of structures, parking lots, and drive aisles. Measuring the amount of vegetated land on the subject site indicates that there is about 522,027 square feet of open play fields, soccer fields, trees and other vegetation. Additional landscaping exists in the parking lot, around the church building, and adjacent to the sidewalk. The subject site consists of approximately 1,404,224 square feet. Thus the applicants are proposing to maintain more than 25% landscaping coverage. This criterion is met. Additional applicable criterion as identified in the ZDO are included in excerpts and findings below: extension

1009.04 SCREENING AND BUFFERING A. Screening shall be used to eliminate or reduce the visual impacts of the following:

4. Parking lots within or adjacent to an Urban Low Density Residential, VR-5/7, VR-4/5, RA-1, RA-2, RR, RRFF-5, FF-10, FU-10, or HR District;

Finding: The applicant is proposing to keep existing trees and landscaping that along the east and west of the parking lot. The natural areas with dense trees along the eastern portion of the property are also to remain. Therefore, the trees along the property boundaries that are adjacent to RRFF-5 zoned property will provide a screening and buffering element to reduce the visual impacts from adjacent neighbors. **These criterion is met.**

1010 SIGNS. Finding: No sign designs were included in the application materials and no signs were proposed as part of this application. **Therefore, this is informational only and does not apply.**

1015 PARKING AND LOADING.

1015.02 MOTOR VEHICLE PARKING AREA STANDARDS

A. *Off-street parking areas shall be designed to meet the following requirements:*

- 1. Off-street motor vehicle parking areas shall be provided in defined areas of the subject property. No area shall be considered a parking space unless it can be shown that the area is accessible and usable for that purpose and has required maneuvering area for vehicles. Required backing and maneuvering areas shall be located entirely onsite.*
- 2. Automobile parking spaces shall be a minimum of 8.5 feet wide and 16 feet long, except that parallel spaces shall be a minimum of 8.5 feet wide and 22 feet long.*
- 3. A minimum of 25 percent of required parking spaces shall be no larger than 8.5 feet wide and 16 feet long.*
- 4. Parking areas shall comply with minimum dimensions for curb length, stall depth, and aisle width established by the Clackamas County Roadway Standards; these dimensions are based on the orientation (e.g., 45-degree, 90-degree), length, and width of the spaces.*
- 5. Double-loaded, 90-degree angle parking bays shall be utilized where possible.*
- 6. A minimum of one parking space or five percent of the required spaces, whichever is greater, shall be marked and signed for use as carpool/vanpool spaces. These spaces shall be the closest employee automobile parking spaces to the building entrances normally used by employees, but shall not take priority over any spaces required for individuals with disabilities.*
- 7. In parking lots greater than one acre, major onsite circulation drive aisles and lanes crossing to adjacent developments shall not have parking spaces accessing directly onto them.*
- 8. Where feasible, shared driveway entrances, shared parking and maneuvering areas, and interior driveways between adjacent parking lots shall be required.*
- 9. Except for parallel spaces, parking spaces heading into landscaped areas or along the perimeter of a parking lot shall be provided with a sturdy tire stop at least four inches high and located two feet within the space to prevent any portion of a car within the lot from extending over the property line.*

Finding: The applicant is proposing to keep existing parking spaces no expansion is proposed. Z0160-09 had a condition of approval for the County Engineering Division to review and approve the construction plans prior to construction of the additional parking. Therefore, the existing parking has previously been reviewed and approved by the Transportation and Engineering Staff. **These criterion are met.**

B. Parking Minimums: The minimum number of parking spaces listed in Tables 1015-1, Automobile Parking Space Requirements, and 1015-2, Minimum Automobile Parking Space Requirements for Dwellings, applies unless modified in Subsection 1015.02(D).

Table 1015-1 - Land Use Category: Schools: Elementary and Junior High Schools (per school)

Minimum Parking Spaces: 15, or 2 per classroom, whichever is less

C. Parking Maximums – N/A

D. Exceptions to Parking Requirements – N/A

Finding: The applicant is proposing to keep the existing parking spaces that include over 100 parking spaces. The proposal includes using 16 rooms for the K-5 school use. This is a modification of previous land use decisions for a Conditional Uses and Design Review. Thus, the proposal exceeds the 15 spaces that are required. The subject site is outside of the UGB and the building is not being expanded so there are no parking maximums. No exceptions to the parking requirements are needed, or proposed. **These criterion are met.**

1015.03 BICYCLE PARKING STANDARDS

Table 1015-3 - Land Use Category: Schools: Elementary and Junior High Schools (per classroom)

Minimum Bicycle Parking Spaces: 2 per classroom, with a maximum of 100. Minimums outside the UGB are 20 percent of the requirement listed in Table 1015-3.

Finding: The subject property is outside the UGB and the applicant proposes to use 16 rooms as school classrooms. Therefore, 20% of 32 is 6.4 bicycle parking spots. **As conditioned this criterion are met.**

1021 SOLID WASTE AND RECYCLABLE MATERIAL COLLECTION

Finding: The applicant proposes no changes to the location or access for the solid waste collection area.

C. A modification shall not result in any of the following:

1. A change in the type of use (e.g. commercial, industrial, institutional);

Finding: The applicant verified that there is no change in use and even with the addition of parochial school uses since both schools and places of worship are types of Institutional uses pursuant to the definition in ZDO 202. The use of the subject property will continue to be institutional, as approved in prior land use decisions. **This criterion is met.**

2. An increase of greater than 25 percent of the original approved building floor area;

Finding: The applicant stated that the proposed modification of the use involves no change, or increase, in building floor area. **This criterion is met.**

3. *An increase of greater than 25 percent of the original approved lot coverage;*

Finding: The proposal includes no new structures and no new site development. Therefore, no increase in lot coverage is proposed. **This criterion is met.**

4. *An increase in the density of development (residential or recreational uses), or intensity of use, as demonstrated by a change in occupancy rating requiring substantial modifications to structures;*

Finding: Staff verified with Building Code personnel that the proposed addition of educational use to the existing church would change the occupancy rating for a portion of the structure used by more than 6 school students. However, no structural changes are anticipated since places for Assembly such as the church and places for Education are both considered Commercial uses by the Oregon Structural Specialty Code. Therefore, the proposed use that results in a modification of previous land use decisions will not increase the density or intensity of the use, and the change of the occupancy rating will not require substantial modifications to the structure. **This criterion is met.**

5. *An increase in traffic congestion or use of public facilities;*

Finding: The applicant provided a traffic impact study conducted by Lancaster Mobley for 150 students for a K-5 school. A review by the Transportation and Engineering Program staff found no objections to the analysis or findings. The study found no significant impact to the transportation system including traffic congestion. This criterion is met.

6. *A reduction in approved open space;*

Finding: The proposed school use will utilize the existing open space for the school children. Review of the previous land use decisions by staff confirm that no required or approved open space is modified by the addition of a parochial school to serve 150 K-5 students. **This criterion is met.**

7. *A reduction of off-street parking spaces or loading berths, except as provided under Section 1015; or*

Finding: The application materials show no change to the parking spaces or loading berths. **This criterion is met.**

8. *A reduction in required pavement widths or a change in major access locations, except as required by the County.*

Finding: The application materials show that the proposed additional use does not include any changes to road pavement widths at road access locations. Road access to SW Borland is not changing and that is the proposed access for the students, teachers, and parents. There no increase in pavement for parking spaces proposed. **This criterion is met.**

ADVISORY NOTES

Advisory notes are not a part of the decision on this land use permit. The items listed below are not conditions of land use approval and are not subject to appeal. They are advisory and informational only but may represent requirements of other agencies/departments. As such, they may be required by these other agencies/departments in order to complete your proposed development.

1. Clackamas County Building Codes Program has reviewed the proposal and has provided the following advisory notes.
 - a. A change of use permit will be needed.