CITY OF MILWAUKIE
PLANNING COMMISSION
MINUTES
Milwaukie City Hall
10722 SE Main Street
TUESDAY, August 28, 2012
6:30 PM

COMMISSIONERS PRESENT
Lisa Batey, Chair
Clare Fuchs, Vice Chair
Chris Wilson
Mark Gamba
Scott Churchill
Shaun Lowcock

STAFF PRESENT
Scot Siegel, Interim Planning Director
Brett Kelver, Associate Planner
Brad Albert, Civil Engineer
Damien Hall, City Attorney

COMMISSIONERS ABSENT
Wilda Parks

1.0 Call to Order – Procedural Matters*
Chair Batey called the meeting to order at 6:30 p.m. and read the conduct of meeting format into the record.

***Note**: The information presented constitutes summarized minutes only. The meeting video is available by clicking the Video link at http://www.ci.milwaukie.or.us/meetings.*

2.0 Planning Commission Minutes
2.1 June 20, 2012

It was moved by Commissioner Gamba and seconded by Vice Chair Fuchs to approve the June 20, 2012, Planning Commission minutes as presented. The motion passed unanimously.

2.2 July 10, 2012

Chair Batey suggested Item 8.0 be removed the following language be added: "Planning Commission held a vote for Vice Chair which resulted in a tie vote. The issue was deferred to the next meeting."

It was moved by Commissioner Gamba and seconded by Commissioner Churchill to approve the July 10, 2012, Planning Commission minutes as amended. The motion passed unanimously.

3.0 Information Items

Scot Siegel, Interim Planning Director, noted that the new Planning Director, Steve Butler, would begin at the City on September 17. The Residential Development Standards hearing (ZA-11-03) had been continued to the September 18 City Council hearing. Mr. Siegel would continue to work with the City until October 5.

4.0 Audience Participation –This is an opportunity for the public to comment on any item not on the agenda.

Jeff Klein noted that he had voted against approval of an application for expansion of the Portland Parks and Recreation maintenance facility at 8545 SE McLoughlin Blvd in 2009 (CSU-09-02), and the building was now occupied by a tax-paying business that had relocated from Portland as a result of the Portland – Milwaukie light rail project. He noted that he had been correct to vote against the application.

5.0 Public Hearings

5.1 Summary: Blount Parking Lot Expansion
Applicant/Owner: Compass Engineering/Blount International, Inc.
Address: 4909 SE International Way
File: NR-12-05
Staff: Brett Kelver

Chair Batey opened the public hearing for NR-12-05 and read the conduct of minor quasi-judicial hearing into the meeting record.

Brett Kelver, Associate Planner, presented the staff report and recommendation via PowerPoint. He explained the project, and noted approval criteria, recommendations, and conditions.

The Commission asked staff to clarify the type of plantings and extent of the mitigation, the extent of the proposed grading, and whether new future buildings would trigger frontage improvements on International Way.

Sarah Hartung, ESA, explained the selection of trees and shrubs for mitigation planting.

Brad Albert, Civil Engineer, explained the amount of grading that would be required for the project, and stated that some future public improvements would be required if new buildings were proposed on the site.

Chair Batey called for the Applicant's presentation.

John Arand, Blount Corporation, presented the application and described the need for additional employee parking.

The Commission asked questions regarding alternative options; on-site parking management; plans for future development on the site; and landscaping options for the proposed parking lot.

John McConnaughey, Environmental Technology Consultants, approached the Commission and responded to questions regarding the impact of paving on tree health; wetland restoration as related to salmon habitat; potential for relocation of proposed mitigation planting to other areas on site; and potential for redesign of the parking lot to retain existing trees.

Ms. Hartung noted that some of the trees on the proposed site plan had been mislabeled as cottonwood trees, but were actually ash trees, and others were invasive trees. She answered questions regarding retaining existing trees and relocating some mitigation planting to other areas of the site.

Mr. Kelver provided clarification regarding parking area landscaping requirements.

There was no public testimony.

Chair Batey closed the public testimony portion of the hearing and opened Commission deliberation.

The Commission discussed safety along International Way; potential modifications to the grading plan; potential for a tree preservation plan; and revisions to the mitigation plan to include other parts of the property.

The Commission directed staff to revise the conditions of approval as discussed.

The Commission took a brief recess and reconvened at 8:45pm.

Mr. Kelver reviewed proposed revisions to the conditions of approval.

The Commissioners discussed potential redesigns of the parking area; the content of revised conditions; and whether the hearing should be continued to allow for additional information.

Damien Hall, City Attorney, clarified conditions of approval could not be discretionary.

Commissioner Churchill requested that language be included in the Notice of Decision to encourage the applicant to prepare a parking management plan.

The Commission held an extensive discussion about revisions to the conditions of approval.

Mr. Siegel and **Mr. Kelver** reviewed the revised conditions of approval, including the following (references to renumbered conditions):

- Added Condition 1.B.ii
- Added Condition 1.C
- Revised Condition 1.E.ii
- Revised Condition 1.E.iv

It was moved by Chair Batey and seconded by Commissioner Churchill to approve NR-12-05 with staff's recommended amendments to the conditions of approval, and directing staff to make conforming changes to the findings of approval. The motion passed unanimously.

6.0 Worksession Items – None

7.0 Planning Department Other Business/Updates – None

8.0 Planning Commission Discussion Items – None

9.0 Forecast for Future Meetings:

September 11, 2012 1. Public Hearing: CSU-12-11 City of Milwaukie Court Relocation
September 25, 2012 1. Public Hearing: CSU-12-08 PMLR Substation Building
2. Public Hearing: Murals Program / Sign Code Amendments

Meeting adjourned at approximately 9:30 p.m.

Respectfully submitted,

Alicia Martin, Administrative Specialist II

Lisa M. Batey

Lisa Batey, Chair

AGENDA

MILWAUKIE PLANNING COMMISSION
Tuesday August 28, 2012, 6:30 PM

MILWAUKIE CITY HALL
10722 SE MAIN STREET

1.0 Call to Order - Procedural Matters

2.0 Planning Commission Minutes – Motion Needed

2.1 June 20, 2012

2.2 July 10, 2012 *(to be sent in supplemental packet)*

3.0 Information Items

4.0 Audience Participation – This is an opportunity for the public to comment on any item not on the agenda

5.0 Public Hearings – Public hearings will follow the procedure listed on reverse

5.1 Summary: Blount Parking Expansion
Applicant/Owner: Compass Engineering/Blount International, Inc.
Address: 4909 SE International Way
File: NR-12-05
Staff: Brett Kelver

6.0 Worksession Items

7.0 Planning Department Other Business/Updates

8.0 Planning Commission Discussion Items – This is an opportunity for comment or discussion for items not on the agenda.

9.0 Forecast for Future Meetings:

September 11, 2012	1. Public Hearing: CSU-12-11 City of Milwaukie Court Relocation
September 25, 2012	1. Public Hearing: CSU-12-08 PMLR Substation Building 2. Public Hearing: Murals Program/Sign Code Amendments

Milwaukie Planning Commission Statement

The Planning Commission serves as an advisory body to, and a resource for, the City Council in land use matters. In this capacity, the mission of the Planning Commission is to articulate the Community's values and commitment to socially and environmentally responsible uses of its resources as reflected in the Comprehensive Plan

1. **PROCEDURAL MATTERS.** If you wish to speak at this meeting, please fill out a yellow card and give to planning staff. Please turn off all personal communication devices during meeting. For background information on agenda items, call the Planning Department at 503-786-7600 or email planning@ci.milwaukie.or.us. Thank You.

2. **PLANNING COMMISSION MINUTES.** Approved PC Minutes can be found on the City website at www.cityofmilwaukie.org

3. **CITY COUNCIL MINUTES** City Council Minutes can be found on the City website at www.cityofmilwaukie.org

4. **FORECAST FOR FUTURE MEETING.** These items are tentatively scheduled, but may be rescheduled prior to the meeting date. Please contact staff with any questions you may have.

5. **TIME LIMIT POLICY.** The Commission intends to end each meeting by 10:00pm. The Planning Commission will pause discussion of agenda items at 9:45pm to discuss whether to continue the agenda item to a future date or finish the agenda item.

Public Hearing Procedure

Those who wish to testify should come to the front podium, state his or her name and address for the record, and remain at the podium until the Chairperson has asked if there are any questions from the Commissioners.

1. **STAFF REPORT.** Each hearing starts with a brief review of the staff report by staff. The report lists the criteria for the land use action being considered, as well as a recommended decision with reasons for that recommendation.

2. **CORRESPONDENCE.** Staff will report any verbal or written correspondence that has been received since the Commission was presented with its meeting packet.

3. **APPLICANT'S PRESENTATION.**

4. **PUBLIC TESTIMONY IN SUPPORT.** Testimony from those in favor of the application.

5. **NEUTRAL PUBLIC TESTIMONY.** Comments or questions from interested persons who are neither in favor of nor opposed to the application.

6. **PUBLIC TESTIMONY IN OPPOSITION.** Testimony from those in opposition to the application.

7. **QUESTIONS FROM COMMISSIONERS.** The commission will have the opportunity to ask for clarification from staff, the applicant, or those who have already testified.

8. **REBUTTAL TESTIMONY FROM APPLICANT.** After all public testimony, the commission will take rebuttal testimony from the applicant.

9. **CLOSING OF PUBLIC HEARING.** The Chairperson will close the public portion of the hearing. The Commission will then enter into deliberation. From this point in the hearing the Commission will not receive any additional testimony from the audience, but may ask questions of anyone who has testified.

10. **COMMISSION DISCUSSION AND ACTION.** It is the Commission's intention to make a decision this evening on each issue on the agenda. Planning Commission decisions may be appealed to the City Council. If you wish to appeal a decision, please contact the Planning Department for information on the procedures and fees involved.

11. **MEETING CONTINUANCE.** Prior to the close of the first public hearing, *any person* may request an opportunity to present additional information at another time. If there is such a request, the Planning Commission will either continue the public hearing to a date certain, or leave the record open for at least seven days for additional written evidence, argument, or testimony. The Planning Commission may ask the applicant to consider granting an extension of the 120-day time period for making a decision if a delay in making a decision could impact the ability of the City to take final action on the application, including resolution of all local appeals.

The City of Milwaukie will make reasonable accommodation for people with disabilities. Please notify us no less than five (5) business days prior to the meeting.

Milwaukie Planning Commission:

Lisa Batey, Chair
Clare Fuchs, Vice Chair
Scott Churchill
Chris Wilson
Mark Gamba
Shaun Lowcock
Wilda Parks

Planning Department Staff:

Scot Siegel, Interim Planning Director
Brett Kelver, Associate Planner
Ryan Marquardt, Associate Planner
Li Alligood, Associate Planner
Alicia Martin, Administrative Specialist II

CITY OF MILWAUKIE
PLANNING COMMISSION
MINUTES
Milwaukie City Hall
10722 SE Main Street
TUESDAY, June 20, 2012
6:30 PM

COMMISSIONERS PRESENT	**STAFF PRESENT**
Lisa Batey, Chair	Katie Mangle, Planning Director
Chris Wilson	Ryan Marquardt, Associate Planner
Mark Gamba	Justin Gericke, City Attorney
Scott Churchill	
Clare Fuchs	
Shaun Lowcock	

1.0 Call to Order – Procedural Matters*

Chair Batey called the meeting to order at 6:30 p.m. and read the conduct of meeting format into the record.

***Note**: The information presented constitutes summarized minutes only. The meeting video is available by clicking the Video link at http://www.ci.milwaukie.or.us/meetings.*

2.0 Planning Commission Minutes

2.1 April 24, 2012

Commissioner Fuchs moved to approve the April 24, 2012, Planning Commission minutes with corrections to the attendance list. Commissioner Wilson seconded the motion, which passed unanimously.

3.0 Information Items

Chair Batey noted that this was the last meeting for Katie Mangle, Planning Director. She added that Vice Chair Harris had resigned and the Planning Commission Alternate, Wilda Parks, was unable to commit to the Commission at this time. The City would be recruiting for a new Commissioner and elections for Vice Chair would be held at the next meeting.

4.0 Audience Participation –This is an opportunity for the public to comment on any item not on the agenda. There was none.

5.0 Public Hearings

5.1 Summary: Residential Development Standards *continued from 4/24/12*
Applicant: City of Milwaukie
File: ZA-11-03
Staff: Ryan Marquardt

Chair Batey reopened the hearing and read the conduct of continued legislative hearing into the record. The record was opened to allow staff to present the revised proposal.

Ryan Marquardt, Associate Planner, presented the staff report via PowerPoint and reviewed the project and proposal. He noted the changes made in response to the Commission's direction and provided more detail on accessory structures, single-family residential design standards with regard to expansion triggers, and the process for Accessory Dwelling Units (ADUs).

Chair Batey opened public testimony.

Jean Baker spoke on behalf of the Historic Milwaukie Neighborhood District Association (NDA). She commented on the multifamily residential open space requirement and how the low income housing bonus was only at the point of sale. She requested more protection of historic resources and noted her preference to not develop the Farmers Market.

Chair Batey closed public testimony.

Planning Commission Deliberation.

The Commission discussed setbacks for eaves; front yard setbacks and landscaping; accessory structure requirements with regard to screening, entrances, conversions, and setbacks; solar panel pitch; and maximum density calculation

The Commission directed staff to make the following revisions:

- Change front yard setback for larger accessory structures to 40 ft from front lot line or behind front of the house. The structure cannot exceed 800 sq ft if property was less than 1 acre or 1500 sq ft for over 1 acre.

- Revise multifamily residential public open space requirement to increase number of items required to 4 items and change threshold to 20 units; under 20 units to require 2 items.
- Remove Willamette Greenway buffer areas and large trees from list as already required.
- Remove density bonus for affordable housing unless it was determined to be a state or regional requirement.
- Remove the limitation on the roof peak height for solar panels.

Commissioner Gamba moved to recommend adoption to City Council of ZA-11-03 Residential Development Standards as amended by the 22-point addendum list and clarification of a 40-ft setback for lots larger than an acre. Commissioner Fuchs seconded the motion, which passed unanimously.

6.0 Worksession Items – None

7.0 Planning Department Other Business/Updates

8.0 Planning Commission Discussion Items

9.0 Forecast for Future Meetings:

June 26, 2012	1. Public Hearing: CSU-12-03 Light Rail Downtown Station *tentative (Note: Meeting Cancelled)*
July 10, 2012	1. Public Hearing: NR-12-01 Crystal Creek Light Rail Review 2. Worksession: Tacoma Station Planning Project

Meeting adjourned at approximately 10:08 p.m.

Respectfully submitted,

Alicia Martin, Administrative Specialist II

_____

Lisa Batey, Chair

CITY OF MILWAUKIE
PLANNING COMMISSION
MINUTES
Milwaukie City Hall
10722 SE Main Street
TUESDAY, July 10, 2012
6:30 PM

COMMISSIONERS PRESENT
Lisa Batey, Chair
Chris Wilson
Mark Gamba
Scott Churchill
Clare Fuchs
Shaun Lowcock

STAFF PRESENT
Scot Siegel, Interim Planning Director
Brett Kelver, Associate Planner
Damien Hall, City Attorney

1.0 Call to Order – Procedural Matters*

Chair Batey called the meeting to order at 6:30 p.m. and read the conduct of meeting format into the record.

***Note**: The information presented constitutes summarized minutes only. The meeting video is available by clicking the Video link at http://www.ci.milwaukie.or.us/meetings.*

2.0 Planning Commission Minutes

2.1 May 8, 2012

It was moved by Commissioner Gamba and seconded by Commissioner Fuchs to approve the May 8, 2012, Planning Commission minutes as corrected. The minutes were approved unanimously.

2.1 May 22, 2012

It was moved by Commissioner Churchill and seconded by Commissioner Gamba to approve the May 22 2012, Planning Commission minutes as corrected. The minutes were approved unanimously.

3.0 Information Items

Chair Batey introduced Scot Siegel as the Interim Planning Director.

4.0 Audience Participation –This is an opportunity for the public to comment on any item not on the agenda.

Yvonne Lazarus complimented Milwaukie staff for being very helpful to her. She inquired about the status of the conditions for the Trolley Trail and Kellogg Bridge for light rail applications.

Chair Batey clarified that meeting conditions of approval occur at different times throughout a project.

Mr. Siegel suggested that Planning staff at the Public Services Facility could walk Ms. Lazarus through the conditions.

5.0 Worksession Items

5.1 Summary: Tacoma Station Area Plan
Staff: Scot Siegel

Mr. Siegel introduced Matt Hastie with Angelo Planning Group, the consultant working with the City on the Tacoma Station Area Plan, and asked the Commission for feedback on the project's goals and objectives.

Mr. Hastie reviewed the process, development scenarios, goals and objectives of the project.

The Commission agreed on the need for increased the mixed use and multi-modal activity, bike/pedestrian connectivity, and tax income and employment opportunities in the area. The Commission also asked staff to provide more time for stakeholder discussion during advisory group meetings.

Mr. Siegel stated he would look for opportunities to extend the stakeholder discussion between scheduled consultant visits.

6.0 Public Hearings

6.1 Summary: Natural Resource Review for Crystal Creek (Light Rail)
Applicant/Owner: KLK Consulting/TriMet

Address: 2519, 2525, & 2535 SE Harrison St
File: NR-12-01
Staff: Brett Kelver

Chair Batey opened the public hearing for NR-12-01 and read the conduct of minor quasi-judicial hearing into the meeting record.

Brett Kelver, Associate Planner, presented the staff report via PowerPoint. He explained the project, and noted approval criteria, recommendations, and conditions.

Sarah Hartung, ESA, the City's natural resource consultant, discussed the review. She noted that the site was quite overgrown and degraded. The mitigation plan compensated for the planned impact by restoring the creek bed, removing the concrete structure, and planting appropriate native plants with a 5-year maintenance plan.

Mr. Kelver provided a supplemental condition 2-D on 6.1 Pages 19-20 of the packet.

Damien Hall, City Attorney, advised the Commission to discuss the supplemental condition during deliberations.

Commissioner Gamba read a potential conflict of interest statement due to having property downstream from site; however, he does not have an actual conflict of interest.

Jeb Doran, TriMet, and Steve Roelof, Vigil-Agrimis, gave the Applicant's presentation and outlined the project, including the restoration, mitigation, planting, and maintenance plans, access plans, timeframe with regard to the fish window, and design alternatives. They answered questions from the Commission regarding invasive species, chemical weed treatment, and culvert replacement.

Mr. Kelver noted that the Code limited the natural resource mitigation requirements to the designated project area. Expansion could be encouraged, but requiring it would need to be tied to approval criteria. Although disturbance and chemical use would take place, the property was degraded so, overall, restoration of the project would be an improvement.

Mr. Doran volunteered additional conditions to include the following:

- Limit chemical use to exclude those on the Milwaukie Prohibited Chemical List.
- Require additional invasive species removal and replanting, and extend the restoration by a 2000-2500 sq ft area within the WQR area.
- Continued to research water quality protection options, including weed treatment and track maintenance.

The Commission directed staff to look into the feasibility of a trackway barrier to minimize runoff into the water quality resource area and to provide more information about TriMet's practices for chemical treatment of weeds.

Commission Churchill moved and Commission Gamba seconded to continue the hearing for NR-12-01Natural Resource Review for Crystal Creek (Light Rail) to a date certain of July 24, 2012. The motion was approved with Commissioner Wilson opposing.

7.0 Planning Department Other Business/Updates

7.1 Election Law Issues for Public Employees *added*

Mr. Siegel noted the recent training on Election Law Issues for Public Employees that also applied to boards and commissions, and handed out the training materials for the Commission to review. He noted a future joint session of the Commission and the Design and Landmarks Committee in the fall to include ethics training.

Mr. Siegel also noted the recruitment for the Planning Director was ongoing and the City had received over 50 applications for both the Planning Director and Senior Planner positions.

8.0 Planning Commission Discussion Items

Commissioner Fuchs was elected as Planning Commission Vice Chair.

9.0 Forecast for Future Meetings:

July 24, 2012 1. Public Hearing: NR-12-01 PMLR Crystal Creek *continued tentative*

	2. Public Hearing: CSU-12-07 PMLR Signal & Communications Building
	3. Public Hearing: NR-12-02 North Clackamas Park Restoration Project *tentative*
July 31, 2012	1. Public Hearing: NR-12-02 North Clackamas Park Restoration Project *tentative*

Meeting adjourned at approximately 10:08 p.m.

Respectfully submitted,

Alicia Martin, Administrative Specialist II

_____

Lisa Batey, Chair

MILWAUKIE
Dogwood City of the West

To: **Planning Commission**

Through: **Scot Siegel, Interim Planning Director**

From: **Brett Kelver, Associate Planner**

Date: **August 21, 2012, for August 28, 2012, Public Hearing**

Subject: **File:** NR-12-05
Applicant: John Arand for Blount International
Owner: Blount International
Address: 4909 SE International Way
Legal Description (Map & Taxlot): 1S2E31CD – taxlot 300
NDA: n/a (Milwaukie Business-Industrial)

ACTION REQUESTED

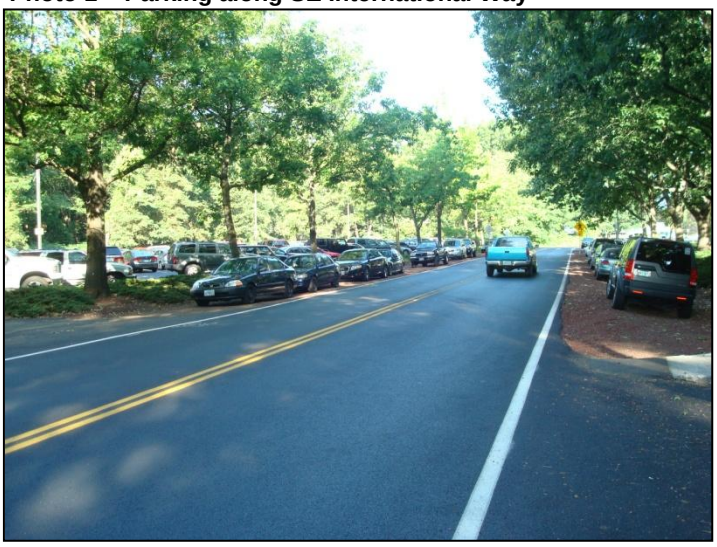
Approve application NR-12-05 and adopt the recommended Findings and Conditions of Approval found in Attachments 1 and 2. This action would allow for expansion of an existing parking lot on the south side of the Blount International campus. The project would disturb a designated Water Quality Resource (WQR) and Habitat Conservation Area (HCA) on the site.

BACKGROUND INFORMATION

Blount International is a global corporation that manufactures equipment for the forestry, garden, and construction industries. Originally founded in 1947 as the Oregon Saw Chain Company, the company was renamed Omak Industries in 1957. It was acquired by the construction company Blount, Inc. in 1985 and shifted its focus exclusively to manufacturing in 1993, when it was renamed Blount International. The company's corporate headquarters is located in Milwaukie and it is reportedly the largest private employer in Clackamas County.

With approximately 1,100 employees at the Blount campus on SE International Way, parking is an ongoing issue, even with 4 parking lots that provide a total of 822 off-street parking spaces. The company participates in DEQ's Employee Commute Options program and encourages and incentivizes alternatives to single-occupant-vehicle commuting. However, seasonal variations in employment levels, staggered shift changes, and continued increases in employment opportunities at the main campus result in significant volumes of on-street parking along the unimproved shoulders of International Way (see Photo 1). To alleviate some of the on-street

Photo 1 – Parking along SE International Way

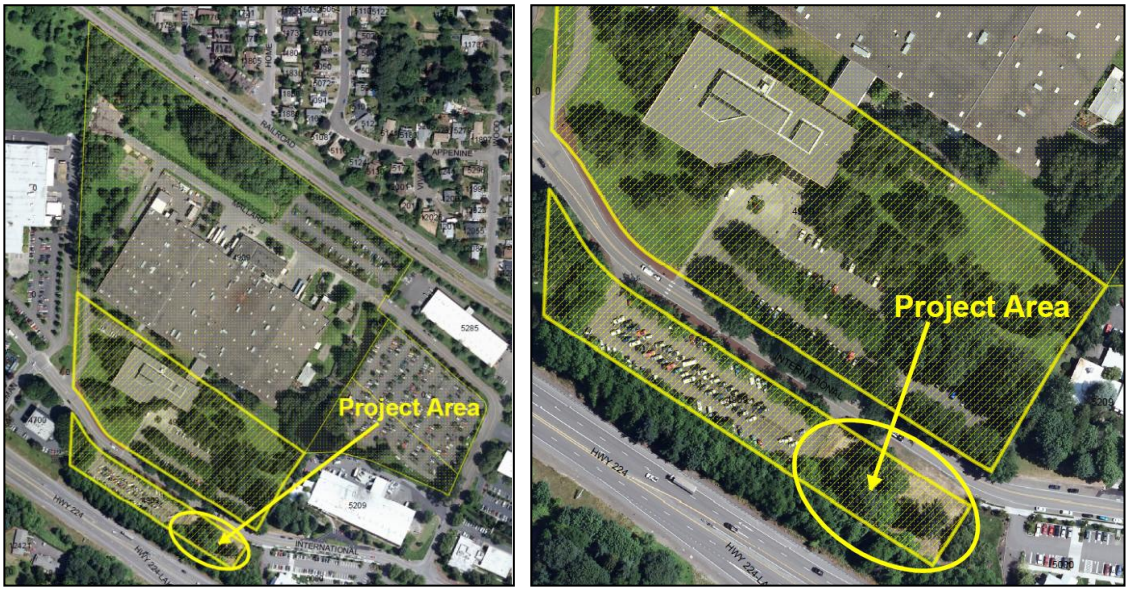


parking congestion and prepare for future expansion of the operation, the company is proposing to expand an existing off-street parking lot across International Way from the main administrative building by adding 53 spaces.

A. Site and Vicinity

The Blount campus is comprised of multiple tax lots, including Tax Lot 300 on Map 1S2E31CD, which is bisected by SE International Way. Tax Lot 300 includes the project area, which is approximately 0.6 acres in size and located in the southeastern corner of the overall campus (see Photos 2a & 2b).

Photos 2a & 2b – Vicinity map of project area, w/ zoom-in



The project area has frontage on International Way to the north and on Oregon Department of Transportation (ODOT) right-of-way for Highway 224 to the south. The Bob's Red Mill campus is adjacent to the east. The adjoining parking lot to the west provides approximately 110 off-street spaces for Blount employees.

A small perennial stream flows northwest to southeast through the ODOT right-of-way, separated from the project area by a steep slope. The stream, along with an associated 50-ft vegetated corridor, is a designated Water Quality Resource (WQR). The project area also includes a designated Habitat Conservation Area (HCA) beyond the WQR area. The project area is undeveloped and is vegetated by a mix of trees and ground cover (see Photos 3 and 4).

Photo 3 – Project area, looking NW

Photo 4 – Project area, looking SE along top of bank

B. Zoning Designation

Business Industrial (BI)

A perennial stream runs through the ODOT right-of-way for Highway 224 adjacent to the project area on the south. The associated vegetated corridor is a Water Quality Resource (WQR) on the site, as is a designated Habitat Conservation Area (HCA).

C. Comprehensive Plan Designation

Industrial (I)

The Milwaukie Transportation System Plan (TSP) designates International Way as a Local street.

D. Land Use and Permit History

City Land Use Actions

City records indicate one previous City land use action for the subject property (4909 SE International Way):

- **June 1978:** DR-78-09 and VR-78-13 – Design Review for two new parking areas, the large lot to the east of the main manufacturing building and the lot south of International Way and adjacent to the project area. The proposal included a variance request to reduce setbacks for the southern parking lot, though the request was withdrawn following recognition that an adjustment to site plan would eliminate the need for the variance.

Other Land Use Actions

There are no records of other land use actions for the subject property.

Other Permits

The proposed development does not trigger the need for permits from other agencies (such as the Army Corps of Engineers or Oregon Department of State Lands) related to natural resources.

E. Proposal

The applicant is seeking land use approval for disturbance of the Water Quality Resource (WQR) and Habitat Conservation Area (HCA) within the project area to expand an existing parking lot. The proposal includes the following:

1. Construct an off-street parking area with 53 spaces. The new parking area adjoins an existing parking lot to the west. As proposed, no new access will be opened onto International Way; the new parking area will use an existing access in the adjoining parking lot.
2. Pave and stripe the new parking area to establish spaces and drive aisles that meet the dimensional standards of the City's off-street parking regulations in Milwaukie Municipal Code (MMC) Section 19.606. The proposal includes establishing perimeter and interior landscaped areas in accordance with the requirements of MMC 19.606.2.
3. Mitigate for disturbance of approximately 15,240 sq ft of WQR and HCA disturbance by planting 152 native trees and 762 native shrubs in an area of approximately 17,635 sq ft. The mitigation planting area is a contiguous strip of land extending alongside the top of the stream bank on Tax Lot 300from the new parking area westward.
4. Treat stormwater runoff on site in a detention pond and bioswale. The parking lot will be graded to drain stormwater toward International Way and away from the WQR area. The pond and swale areas will also count toward providing the required parking area landscaping.

The project requires approval of the following application:

1. NR-12-05, Natural Resource Review

KEY ISSUES

Summary

Staff has identified the following key issue for the Planning Commission's deliberation. Aspects of the proposal not listed below are addressed in the Findings (see Attachment 1) and generally require less analysis and discretion by the Commission.

1. Are there other practicable alternatives with less impact to the WQR and HCA than the proposed parking lot expansion?

Analysis

A. Are there other practicable alternatives with less impact to the WQR and HCA than the proposed parking lot expansion?

For the scale and type of primary uses occurring on the Blount campus (manufacturing and office), the company is providing over 300 off-street parking spaces more than the minimum required by the City's off-street parking code. However, the site is still over 200 spaces below the maximum number allowed, and, as evidenced by the amount of parking along the shoulders of International Way, there is a continued demand for additional parking on the site. Given that Blount actively engages in efforts to reduce the demand for parking, as described above, and given the company's long-term master plan, which

provides for expanding its operations on International Way, the proposal to expand an existing parking area is reasonable.

As presented in the applicant's materials, several alternatives to the proposed project have been evaluated and found to be either impracticable or no less impactful to a WQR or HCA. Alternative B, constructing a larger parking lot within the project area, would disturb more of the WQR for possibly only 1 or 2 additional spaces. Alternative C, building a parking structure on a smaller footprint within the project area, is cost prohibitive, according to the applicant's analysis. Alternatives D1 and D2, constructing surface parking lots in either of 2 locations behind the manufacturing building, would also disturb WQR and/or HCA areas, including some with an arguably greater value because they are not as hemmed-in by existing development.

Alternative E, constructing a surface lot in front of the main administrative building (to the southeast from the existing building), is not feasible due to the company's master plan to reserve that space for future expansion of either administrative or manufacturing capacity. In response to staff's question about whether the space to the southwest of the administrative building is available for new surface parking, the applicant presented a revised map from the company's master plan, showing that the area in question is also targeted for future expansion of the facility (see Attachment 3-d). Given the layout of the existing campus, it is reasonable to expect that the areas immediately adjacent to the main administrative building are the most practicable areas to preserve for expansion. Staff believes it is not reasonable to require the applicant to develop a voluntarily proposed parking lot in either area where it might later have to be removed for expansion of the company's operation.

Staff examined another alternative, that of reducing the size of the proposed parking area by eliminating the 10 parallel parking spaces and one-way drive aisle along the southern edge. Such a proposal would reduce the amount of permanent disturbance within the WQR area and would allow the likely preservation of at least one large tree (a 30-in cottonwood). However, the project area is surrounded by urban development—the adjoining parking area to the west, International Way to the north, Bob's Red Mill to the east, and Highway 224 to the south. Periodic mowing of the grass-mix ground cover has precluded the growth of a shrub layer. Most of the existing trees on the site are small-diameter cottonwoods or alders. Despite the Class A ~~–~~Good" rating of the WQR according to MMC Table 19.402.15, the area is isolated and does not contribute to a larger natural riparian environment.

Staff also considered the location of the proposed parking area. MMC 19.402 recognizes that where extreme slopes (i.e., slopes greater than 25%) are stable it is allowable to reduce the width of the vegetated corridor by up to 25 ft (see Footnote 5 in MMC Table 19.402.15). The bank adjacent to the stream has a slope of at least 75%, which provides some protection by confining the water feature in a deep ravine. Although the applicant has not requested a reduction of the vegetated corridor width and there has been no formal study of slope stability within the project area, there is no indication that the slope is unstable. The existing topography at the top of the bank and the grading proposed for the new parking area will drain stormwater discharges away from the resource. As proposed, there would be a 15-ft vegetated buffer between the new parking area and the property line, plus at least 22 ft of additional buffering down the slope to the stream itself.

A related question is whether the benefits of a wider vegetated corridor would outweigh those of providing 10 more off-street parking spaces. Staff believes that a smaller parking area does not necessarily represent a better alternative than the applicant's proposed

option. The existing riparian area along the stream is already narrow as a result of existing development, and the applicant's mitigation plan would result in additional native plantings along a greater linear stretch of the stream. Staff believes that providing additional parking spaces on the site as proposed, which would reduce the need for on-street parking along International Way, outweighs the benefits of providing a wider vegetated corridor in this location where the stream is already buffered by the adjacent steep slope.

Given these considerations, staff has concluded that the proposed parking area expansion is in fact the most practicable, least impactful option for providing additional off-street parking on the Blount campus.

CONCLUSIONS

A. Staff recommendation to the Planning Commission is as follows:

1. Approve application NR-12-05 and adopt the recommended Findings and Conditions of Approval found in Attachments 1 and 2. This action would allow for disturbance of the Water Quality Resource (WQR) and Habitat Conservation Area (HCA) in the project area to expand an existing off-street parking lot by 53 spaces.
2. Adopt the attached Findings and Conditions of Approval.

B. Staff recommends the following key conditions of approval (see Attachment 2 for the full list of Conditions of Approval)**:**

- Provide a construction management plan, showing erosion control and tree protection measures, for Planning review and approval.
- Provide a final mitigation plan for Planning review and approval, including the following revisions:
  - Updated timeline
  - Revised planting list for flat areas, replacing Garry oak with one or more shade-tolerant native tree species (Big-leaf maple, Grand fir, Western red cedar, and/or Oregon ash)
  - Notation that the mitigation area will be planted or seeded with native grasses or other native ground cover to achieve 100% surface (instead of bark mulch)
  - Notation that a minimum of 3 pieces of large wood (minimum 20 ft long, 15-in diameter) from trees removed from the site will be retained within the mitigation area (at the western end)
  - Contingency component
- Install wheel stops in all 90-degree-angle parking spaces, to prevent vehicle encroachment into required landscaping areas or drive aisles.
- Provide a more detailed lighting plan.

CODE AUTHORITY AND DECISION-MAKING PROCESS

The proposal is subject to the following provisions of the Milwaukie Zoning Ordinance, which is Title 19 of the Milwaukie Municipal Code (MMC).

- MMC Section 19.316 Business Industrial Zone BI
- MMC 19.402 Natural Resource Review
- MMC 19.600 Off-Street Parking and Loading
- MMC 19.700 Public Facility Improvements
- MMC 19.1006 Type III Review

This application is subject to Type III review, which requires the Planning Commission to consider whether the applicant has demonstrated compliance with the code sections shown above. In Type III reviews, the Commission assesses the application against review criteria and development standards and evaluates testimony and evidence received at the public hearing.

The Commission has 4 decision-making options as follows:

A. Approve the application subject to the recommended Findings and Conditions of Approval.

B. Approve the application with modified Findings and Conditions of Approval. Such modifications need to be based on applicable approval criteria and read into the record.

C. Continue the hearing, to allow further consideration of the recommended Findings and Conditions of Approval.

D. Deny the application finding that it does not meet approval criteria.

The final decision on this application, which includes any appeals to the City Council, must be made by November 10, 2012, in accordance with the Oregon Revised Statutes and the Milwaukie Zoning Ordinance. The applicant can waive the time period in which the application must be decided.

COMMENTS

Notice of the proposed changes was given to the following agencies and persons: City of Milwaukie Building and Engineering Departments; Clackamas County Fire District #1; North Clackamas Chamber of Commerce; and ESA, the City's on-call natural resource consultant. The following is a summary of the comments received by the City. See Attachment 4 for further details.

- **Brad Albert, City of Milwaukie Engineering Department:** The provisions of MMC 19.700 Public Facility Improvements are not applicable to the proposed development.

  Staff Response: *This comment has been incorporated into the Findings.*

- **Sarah Hartung, Senior Biologist with ESA:** As the City's on-call natural resource consultant, ESA reviewed the application; assessed the existing conditions, alternatives analysis, and proposed mitigation plan; and prepared a report summarizing the analysis.

  Staff Response: *The ESA analysis has been incorporated into the Findings and is available in its entirety as Attachment 4-b.*

- **Mike Boumann, Clackamas County Fire District #1:** No comments on the proposal.
- **Tom Larsen, City of Milwaukie Building Official:** No comments on the proposal.

ATTACHMENTS

Attachments are provided only to the Planning Commission unless noted as being attached. All material is available for viewing upon request.

1. Recommended Findings in Support of Approval (attached)
2. Recommended Conditions of Approval (attached)
3. Applicant's Narrative and Supporting Documentation (only 3-d is attached)
   (This information was provided to the Planning Commission on August 8, 2012.)
   a. Narrative Addressing Code Sections
   b. Impact Evaluation and Alternatives Analysis
      Appendices:
      i. Appendix A: Figures
         - Figure 1 – Proposed Impact and Alternatives
         - Figure 2 – Milwaukie Natural Resources Overlay Map
         - Figures 3A & 3B – Temporary and Permanent Impact Areas
         - Figure 4 – Typical Mitigation Planting
         - Figure 5 – Mitigation Planting Areas
         - Figure 6 – Page from the Blount Master Plan

      ii. Appendix B: Ground Level Color Photographs
      iii. Appendix C: Wetland Data Forms
      iv. Appendix D: Table of Acronyms
   c. Plan Set (11"x17")
      - Existing Conditions Plan
      - Preliminary Grading and Drainage Plan
      - Preliminary Site Plan and Landscape Plan

   d. Updated Page from the Blount Master Plan *(received August 16, 2012)* (attached)
4. Comments Received (only 4-b is attached)
   a. Brad Albert, City of Milwaukie Engineering Department
   b. Sarah Hartung, Senior Biologist with ESA – Memo: Natural Resource Review for parking expansion at Blount International (attached)
   c. Mike Boumann, Clackamas County Fire District #1
   d. Tom Larsen, City of Milwaukie Building Official
5. List of Record

Recommended Findings in Support of Approval

1. The applicant, John Arand on behalf of Blount International ("the applicant"), is seeking land use approval to expand an existing parking lot in the southeastern corner of its campus on SE International Way. The project will establish 53 new off-street parking spaces and will disturb a designated Water Quality Resource and Habitat Conservation Area.

   The application materials (including forms, narrative, figures, and site plans) were originally submitted on May 8, 2012. City staff deemed the application complete on July 13, 2012. Final revised materials were submitted on July 17, 2012.

2. The project area encompasses approximately 26,000 sq ft (0.6 acres) in the southeastern corner of the Blount International campus. The campus is comprised of multiple tax lots, including Tax Lot 300 on Map 1S2E31CD, which is bisected by SE International Way. The subject property is zoned Business Industrial BI.

   The project area has frontage on International Way to the north and on Oregon Department of Transportation (ODOT) right-of-way for Highway 224 to the south. The Bob's Red Mill campus is adjacent to the east. An adjacent parking lot to the west provides approximately 110 off-street spaces for Blount employees.

   A small perennial stream flows northwest to southeast through the ODOT right-of-way, separated from the project area by a steep slope. The stream, along with an associated 50-ft vegetated corridor, is a designated Water Quality Resource (WQR). The project area also includes a designated Habitat Conservation Area (HCA) beyond the WQR area. The project area is undeveloped and is vegetated by a mix of trees and ground cover.

3. The proposal is subject to the following provisions of Milwaukie Municipal Code (MMC) Title 19 Zoning:

   MMC 19.316 Business Industrial Zone BI
   MMC 19.402 Natural Resources
   MMC 19.600 Off-Street Parking and Loading
   MMC 19.700 Public Facility Improvements
   MMC 19.1006 Type III review

4. The Planning Commission reviewed the application in compliance with the Type III review process described in MMC 19.1006. As required, the applicant posted public notice at the site and the City mailed notices to surrounding property owners and residents within 300 ft of the site. The Planning Commission held a duly advertised public hearing considering the application on August 28, 2012.

5. The Planning Commission reviewed the application for compliance with the code sections listed in Finding 3.

   The Planning Commission finds that code sections not addressed in these findings are not applicable to the decision.

6. MMC 19.316 Business Industrial Zone BI

   A. MMC 19.316.2 establishes the uses permitted outright in the BI zone, including manufacturing and fabrication as well as business offices and corporate headquarters.

      The Blount campus includes a substantial manufacturing component as well as business offices that serve as the company's world headquarters. The existing uses on the overall

site are permitted outright in the BI zone. The proposed development will provide off-street parking in support of the existing, allowed uses on the site.

B. MMC 19.316.6 establishes development standards for the BI zone, including requirements for landscaping on 20% of the site.

Tax lot 300 constitutes approximately 8.4 acres of the overall Blount campus. As evidenced by the applicant's submittal materials, approximately 3.5 acres (just over 40%) of tax lot 300 is landscaped. The proposed development will reduce the area of landscaping by approximately 0.4 acres, leaving nearly 37% of tax lot 300 landscaped. This standard is met.

The Planning Commission finds that the proposed development meets the applicable standards of MMC 19.316.

7. MMC 19.402 Natural Resources

MMC 19.402 establishes regulations for designated natural resource areas. The standards and requirements of MMC 19.402 are an acknowledgment that many of the riparian, wildlife, and wetland resources in the community have been adversely impacted by development over time. The regulations are intended to minimize additional negative impacts and to restore and improve natural resources where possible.

A. MMC 19.402.3 establishes applicability of the Natural Resource (NR) regulations, including all properties containing Water Quality Resources (WQRs) and Habitat Conservation Areas (HCAs) as shown on the City's NR Administrative Map. Specifically, MMC 19.402.3.G requires the submittal of a construction management plan for projects that will disturb more than 150 sq ft of WQR and/or HCA.

The project area is adjacent to a small perennial stream in the ODOT right-of-way for Highway 224. As per MMC Table 19.402.15, the perennial stream is a primary protected water feature and, along with its associated vegetated corridor, constitutes a WQR on the site. The City's Natural Resource (NR) Administrative Map also shows a designated HCA within the project area.

As evidenced by the applicant's submittal materials, the proposed development will disturb approximately 13,750 sq ft of WQR and/or HCA area. The proposed development is not listed as exempt according to the standards outlined in MMC 19.402.4.

The Planning Commission finds that the requirements of MMC 19.402 are applicable to the project area, including the requirement to provide a construction management plan according to the standards of MMC 19.402.9.

B. MMC 19.402.8 establishes that certain activities within a designated WQR and/or HCA, including development activities allowed in the base zone, are subject to Type III review (MMC 19.1006) and the general discretionary review criteria provided in MMC 19.402.12.

The proposed construction of an expanded parking lot within a designated WQR and HCA is not exempt from the provisions of MMC 19.402, nor is it permitted as a Type I or Type II activity.

The Planning Commission finds that the proposed development is subject to Type III review according to the procedures provided in MMC 19.1006. The Commission finds that the general discretionary review criteria of MMC 19.402.12 apply to the proposed disturbance of the WQR and HCA.

C. MMC 19.402.9 establishes standards for construction management plans, which are required for projects that disturb more than 150 sq ft of natural resource area. Construction management plans must provide information related to site access, staging of materials and equipment, and measures for tree protection and erosion control.

As noted in Finding 7-A, a construction management plan is required prior to commencement of the proposed development activity. A construction management plan was not included with the application submittal. A condition is established to ensure that a construction management plan, including the information required by MMC 19.402.9, is provided as part of the development permit review process.

The Planning Commission finds that, as conditioned, this standard is met.

D. MMC 19.402.11 establishes development standards for projects that impact a natural resource.

i. MMC 19.402.11.A provides standards for protecting natural resource areas during development, including requirements to mark work areas, flag WQRs and HCAs that are to remain undeveloped, and conduct all work in accordance with an approved construction management plan.

The proposed project is subject to all relevant standards in MMC 19.402.11.A. A condition is established to ensure that all project work is performed in accordance with an approved construction management plan.

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

ii. MMC 19.402.11.B establishes general standards for required mitigation, including requirements related to items such as plant species, size, spacing, and diversity, as well as location of mitigation area, removal of invasive vegetation, and plant survival.

The applicant has provided a mitigation plan for the proposed disturbance to the WQR and HCA within the project area. The plan includes information about species, size, spacing, and survival within an extensive designated mitigation area. As proposed, existing nuisance species vegetation will be removed and mitigation plantings will be maintained for 2 years as required. The applicant has proposed to install a layer of bark mulch around new plantings within the flat portions of the mitigation area.

Although MMC 19.402.11.B.9.a(1) encourages mulching around new plantings to enhance survival, MMC 19.402.11.B.8 requires planting or seeding with native grasses or other ground covers around new mitigation plantings, to achieve 100% surface coverage. Bark mulch would be acceptable for standard perimeter and interior landscaping areas as per the City's off-street parking standards in MMC 19.600, but where interior and/or perimeter parking landscaping is also serving as mitigation for WQR or HCA disturbance, bark mulch is not acceptable as an extensive ground cover.

A condition is established to require a final version of the mitigation plan, including revisions to ensure that the mitigation area is planted or seeded to achieve 100% coverage and that a contingency component is included.

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

iii. MMC 19.402.11.C establishes mitigation requirements for disturbance within WQRs. The requirements vary depending on the existing condition of the WQR, according to the categories established in MMC Table 19.402.11.C. For Class A "Good" WQR conditions, MMC Table 19.402.11.C requires that the applicant submit a plan for mitigating water quality impacts related to the development.

According to the applicant's inventory of vegetation in the WQR, there is 100% coverage of the project area by trees and ground cover with about 70% tree canopy coverage. Although the applicant's submittal categorized the area as Class B "Marginal," MMC Table 19.402.11.C categorizes any area with more than 80% combined coverage and at least 50% tree canopy as Class A "Good."

Within the WQR, the proposed development will permanently disturb approximately 5,660 sq ft and temporarily disturb approximately 1,320 sq ft. As evidenced by the applicant's submittal materials, all temporary disturbance areas will be revegetated with native plants. As mitigation for permanent disturbance to the WQR, as well as for approximately 8,085 sq ft of permanent disturbance to the HCA within the project area, the applicant has proposed to restore approximately 17,635 sq ft within or adjacent to the WQR area on the subject property.

ESA, the City's on-call natural resource consultant, reviewed the applicant's submittal materials and visited the site to assess existing conditions. ESA concluded that, with a few minor revisions, the proposed mitigation plan provides an adequate response to the proposed WQR and HCA disturbance. ESA provided several specific recommendations related to mitigation-plant species to increase the likelihood that the 80% survival requirement of MMC 19.402.11.B.9 will be met. A condition is established to ensure that these recommendations, addressed in more detail in Finding 7-E-i(f), are incorporated into the final revised mitigation plan.

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

The Planning Commission finds that, as conditioned, the proposed development meets the applicable standards of MMC 19.402.11.

E. MMC 19.402.12 establishes a discretionary process for analyzing the impacts of development on WQRs and HCAs.

i. MMC 19.402.12.A requires a report presenting an evaluation of impacts and analysis of alternatives for the proposed development. The report must be prepared and signed by a qualified natural resource professional and must include several specific elements, which are addressed below.

The submittal materials include an Impact Evaluation and Alternatives Analysis report ("NR report") prepared by John McConnaughey, a professional wetland scientist with the firm Environmental Technology Consultants. The report includes an evaluation of impacts and analysis of alternatives sufficient to address the required elements listed below.

a) MMC 19.402.12.A.1 requires identification of the ecological functions of riparian habitat found on the subject property.

The applicant's NR report discusses the existing ecological functions of the stream and adjacent riparian area. Adjacent to the project area, the stream is exposed and unobstructed, separated from the project area by a steep slope; however, the stream is piped underground for long stretches both above and below the project area. While there are some native trees and plants, the overall plant diversity within the project area is low and dominated by invasive nuisance species such as clematis and blackberry.

ESA reviewed the applicant's NR report and generally concurs with the applicant's assessment of ecological functions and values of the WQR. The project area is relatively small and surrounded by urban development. The stream appears to be perennial. The applicant's identification of ecological functions is sufficient to meet this requirement.

b) MMC 19.402.12.A.2 requires an inventory of vegetation, sufficient to categorize the existing condition of the WQR per MMC Table 19.402.11.C.

The applicant's NR report includes an inventory of existing vegetation within the project area. Trees and an apparent mix of common lawn grasses provide 100% coverage, with approximately 70% tree canopy. The trees are identified as primarily cottonwood and alder, with a cedar and a couple of maples. There is no significant shrub layer and the understory is dominated by nuisance species, including clematis and blackberry. The applicant's NR report categorized the WQR area as Class B "Marginal."

ESA reviewed the applicant's NR report and visited the site to assess existing conditions. In general, ESA concurred with the applicant's NR report but noted that the 100% overall coverage and approximately 70% tree canopy should categorize the condition of the WQR area as Class A "Good," according to MMC Table 19.402.15.

c) MMC 19.402.12.A.3 requires an assessment of the water quality impacts related to the proposed development.

The applicant's NR report discusses the impacts of the proposed development on the WQR and HCA, including the removal of a majority of existing trees on the site and the addition of impervious surface. The report states that 152 native trees and 762 native shrubs will be planted as mitigation and that the new impervious surface will be graded to drain away from the WQR and HCA for on-site treatment in a swale facility. A minimum 20-ft-wide vegetated buffer area will be established between the new parking lot and the top of the stream bank in the adjacent right-of-way for Highway 224.

ESA reviewed the applicant's NR report and concurred with the applicant's assessment of the proposed development's impacts on water quality. ESA concluded that the proposed development will have minimal to no impact on water quality or basic stream function.

d) MMC 19.402.12.A.4 requires an analysis of alternatives to the proposed development, including an explanation of the rationale behind choosing the alternative selected.

The applicant's NR report presents and discusses 5 alternatives to the proposed development. The alternatives that were examined include building a larger parking lot within the project area, building a parking structure within the project area, or building a parking lot in 3 other locations beyond the project area.

The applicant's NR report provides the following conclusions en route to asserting that the proposed development within the project area represents the most practicable alternative:

- *There is a clear need for additional off-street parking in the vicinity, evidenced by the number of vehicles commonly parked in the public right-of-way along SE International Way. In addition, Blount has hired more than 60 full-time and temporary employees within the last year.*
- *Blount already participates in the Department of Environmental Quality's Employee Commute Options program, aimed at reducing the number of vehicle trips and limiting the need for parking. Numerous employees use alternative transportation modes, telecommute, or use a compressed work-week to reduce parking demand.*

- *Building a larger parking lot within the project area would provide more parking spaces but would disturb more of the WQR and would reduce the width of the vegetated buffer area between the new parking lot and the top of the stream bank.*
- *It is not economically feasible to build a 2-storied parking structure that would provide the same number of stalls but in a smaller footprint within the project area.*
- *Two other undeveloped areas on the Blount campus that are large enough to accommodate a new parking lot also include WQRs and/or HCAs that would be disturbed by the project.*
- *One additional possible location on the Blount campus is the site of a proposed future expansion of the existing office building, as per a master plan for the site. Building a parking lot in that location would conflict with the master plan.*

Given these considerations, the applicant's analysis concludes that the proposed development is the most practicable, least impactful option.

e) For alterations to existing structures within the WQR, MMC 19.402.12.A.5 requires the presentation of evidence that 1) no practicable alternative design or method of development exists that would have a lesser impact on the WQR than the one proposed and 2) mitigation is provided for impacts to the WQR.

The proposed development does not involve altering an existing structure. This standard is not applicable.

f) MMC 19.402.12.A.6 requires a mitigation plan, including a description of the proposed development's impacts to the WQR, a map showing where mitigation activities will occur and a schedule and timeline for implementation.

The applicant's NR report includes a description of the proposed disturbances to the WQR and HCA. The new parking lot will result in permanent disturbances of approximately 5,662 sq ft of the WQR and 8,085 sq ft of the HCA. Temporary disturbances for construction will impact approximately 1,320 sq ft of the WQR and 170 sq ft of the HCA. The applicant's NR report includes a map (Figures 3A and 3B) that shows the location of temporary and permanent disturbance areas within the WQR and HCA, in addition to a timeline for implementation.

The project area is approximately 26,000 sq ft, with 23,275 sq ft directly affected by the proposed development. Within the area of direct impact, the total disturbance (permanent and temporary) to the WQR and/or HCA is approximately 15,240 sq ft. Because there is very little room for mitigation within the project area, the applicant has proposed to install mitigation plantings within the adjacent WQR and HCA that extends to the west. The mitigation area is approximately 17,635 sq ft and includes a combination of flat upland areas and steep stream bank. The mitigation plan includes some detail (Figures 4A and 4B) distinguishing how the flat upland and steep stream bank areas will be planted. Throughout the mitigation area, 152 native trees and 762 native shrubs will be planted.

ESA reviewed the mitigation plan provided in the NR report and concluded that it will result in restoration of the WQR to an equal or better condition. ESA noted that the plan calls for installing Oregon white oak (also referred to as Garry oak) in the shady area at the top of the stream bank, although this species is slow-growing and generally more successful in full-sun conditions. ESA recommended

using Big-leaf maple, Grand fir, Western red cedar, and/or Oregon ash instead. Furthermore, ESA recommended that the applicant consider planting more than just two tree species at the top of the slope and confirmed that retaining some large wood from trees removed from the site would be ecologically beneficial. Conditions are established to incorporate these recommendations into a final revised mitigation plan.

As conditioned, the Planning Commission finds that the NR report provided by the applicant meets the applicable standards of MMC 19.402.12.A.

ii. MMC 19.402.12.B establishes criteria for approving disturbances to the WQR and/or HCA.

a) MMC 19.402.12.B.1.a requires that the proposed development avoid intrusion into the WQR and/or HCA to the extent practicable and that it be the least impactful alternative.

As discussed in Finding 7-E-i(d), the applicant has analyzed several alternatives to the proposed development. Two of those alternatives, the option of building a new parking lot in front of the southeast corner of the main administrative building (identified by the applicant as Alternative E) and the option of building a two-story parking structure on a smaller footprint within the project area (Alternative C), do not involve disturbance of a WQR or HCA.

Alternative E is found to be not practicable because the applicant has identified that area as one where future expansion of the office and/or manufacturing operations will be located. Staff identified an additional, similar alternative of building a parking lot in front of the southwest corner of the main administrative building. This area, too, has been identified as one for future expansion of the company's office function. For this reason, this similar alternative is also found to be not practicable.

The costs of developing Alternative C, the parking structure option, are estimated at up to 10 times those of developing a surface lot of similar capacity. This alternative is effectively cost-prohibitive for providing the proposed number of new parking spaces (53).

Of the remaining alternatives examined, Alternative B, a larger surface lot closer to the stream, would disturb a greater area of WQR to gain at most 1 to 2 additional spaces. Alternatives D1 and D2, a surface lot at one of two locations in the northwest corner of the campus, would also disturb WQR and HCA, including direct impacts to the protected water feature itself. These alternatives are found to be at least as impactful to the WQR and/or HCA as the proposed development.

The proposed development (Alternative A), pushes the new parking lot as far away as possible from the top of the stream bank while still providing the proposed number of new parking spaces (53) in a way that meets the applicable design standards for off-street parking. As proposed, the new parking lot avoids intrusion into the WQR and/or HCA to the greatest extent practicable and is the least impactful alternative.

As proposed, this criterion is met.

b) MMC 19.402.12.B.1.b requires that the proposed development minimize detrimental impacts to the WQR and/or HCA to the extent practicable.

The proposed development will maintain a vegetated buffer at least 20 ft wide between the new parking lot and the top of the stream bank in the adjacent right-

of-way for Highway 224. As evidenced by the applicant's submittal materials, the surface of the new parking lot will be graded to drain stormwater away from the top of bank and the protected water feature below. Where practicable, the applicant has proposed to limit the number of trees that must be removed to those that are directly impacted by the proposed development. A condition is established to ensure that removal of any of the 10 existing trees within the mitigation area along the southern edge of the new parking area is mitigated on a one-for-one basis.

The proposed development is subject to all applicable development standards, including measures to protect areas within the WQR and HCA that will not be disturbed by the proposed development. A condition is established to ensure that all project work is performed in accordance with an approved construction management plan.

As conditioned, this criterion is met.

c) MMC 19.402.12.B.1.c requires that the proposed development mitigate for detrimental impacts to the WQR and/or HCA. Mitigation shall be on site, use native plants, be done in accordance with allowable windows for in-water work, and follow a mitigation maintenance plan.

As proposed, the applicant will mitigate for both permanent and temporary impacts to the WQR and HCA by restoring the remaining WQR and HCA within the project area as well as other WQR and HCA adjacent to the project area. As noted in Finding 7-E-i(f), the total disturbance area is approximately 15,240 sq ft, and the area proposed for mitigation is approximately 17,635 sq ft. The applicant has proposed to plant 152 native trees and 762 native shrubs, based on the formula established in MMC 19.402.11.D.2.b.

ESA assessed the proposed mitigation plan and determined that it is sufficient for the proposed disturbance to the WQR and HCA. As noted in Finding 7-E-i(f), ESA suggested that the proposed Garry oak should be replaced with Big-leaf maple, Grand fir, Western red cedar, and/or Oregon ash in the shady areas at the top of the stream bank, in order to enhance the survival chances for mitigation planting. Furthermore, ESA also recommended that the applicant consider planting more than just two tree species at the top of the slope. And ESA confirmed that retaining some large wood from trees removed from the site would be ecologically beneficial. Conditions are established to incorporate these suggestions and ensure that the mitigation plan adequately compensates for detrimental impacts to the ecological functions of the WQR.

As conditioned, this criterion is met.

The Planning Commission finds that, as conditioned, the proposed development meets the approval criteria established in MMC 19.402.12.B.

The Planning Commission finds that, as conditioned, the proposed development meets the applicable standards of MMC 19.402.12.

F. MMC 19.402.15 establishes standards for verifying the boundaries of WQRs and HCAs and for administering the City's Natural Resource (NR) Administrative Map. The locations of WQRs are determined based on the provisions of MMC Table 19.402.15. In general, for primary protected water features the WQR includes the feature itself and a vegetated corridor that extends 50 ft from the top of bank (for streams) or delineated edge of the feature (for wetlands).

The application submittal includes a map showing the location of the stream within the adjacent Highway 224 right-of-way. The applicant's materials portray the vegetated corridor adjacent to the protected water feature in accordance with the provisions of MMC Table 19.402.15, including an accounting for steep slopes in the project area. The applicant's materials also present the HCA within the project area as it is depicted on the City's NR Administrative Map.

ESA visited the site and reviewed the applicant's map of the WQR and HCA. ESA concurred with the applicant's presentation of the location of the primary protected water feature and the adjacent vegetated corridor that comprises the WQR.

The Planning Commission finds that the applicant has accurately mapped the WQR within the project area, according to the relevant provisions of MMC 19.402.15. Furthermore, the Commission finds that the applicant has not disputed the representation of the HCA on the City's NR Administrative Map.

The Planning Commission finds that, as conditioned, the proposed development meets all applicable standards of MMC 19.402.

8. MMC 19.600 Off-Street Parking and Loading

MMC 19.600 regulates off-street parking and loading areas on private property with several objectives, including ensuring there is adequate space for off-street parking, avoiding parking-related congestion on the streets, avoiding unnecessary conflicts between vehicles, bicycles, and pedestrians, improving the appearance and minimizing environmental impacts of parking areas.

A. MMC 19.602 Applicability

As per MMC 19.602.1, the regulations of MMC 19.600 apply to all off-street parking areas whether required as part of development or installed voluntarily for the convenience of users.

The proposed development is a voluntary expansion of an existing parking area and is therefore subject to the applicable standards of MMC 19.600. The proposed development does not include new loading spaces, bicycle parking, carpool and vanpool parking, or a parking structure; therefore, the standards of MMC 19.608, MMC 19.609, MMC 19.610, and MMC 19.611, respectively, are not applicable.

B. MMC 19.603 Review Process

MMC 19.603.2 requires that proposals subject to MMC 19.600 provide a parking plan that shows how all applicable standards are met. The plan must include a variety of items, including a delineation of individual spaces and wheel stops, drive aisles, pedestrian pathways, grading details, location of lighting fixtures, and landscaping.

The applicant's submittal materials include a scaled site plan showing the proposed parking-area improvements, including details related to the applicable requirements. This standard is met.

C. MMC 19.604 General Parking Standards

MMC 19.604.2 requires that accessory parking be located on the same site as the primary use for which the parking is accessory.

The proposed development is located on the same property as the primary use, the manufacturing and office operations of the property owner, Blount International. This standard is met.

D. MMC 19.605 Vehicle Parking Quantity Requirements

MMC Table 19.605.1 provides the minimum required and maximum allowable numbers of off-street parking spaces for various uses. For manufacturing uses, the minimum is 1 space per 1,000 sq ft of floor area and the maximum is 2 spaces per 1,000 sq ft of floor area. For general office uses, the minimum is 2 spaces per 1,000 sq ft of floor area and the maximum is 3.4 spaces per 1,000 sq ft of floor area. For eating and drinking establishments, the minimum is 4 spaces per 1,000 sq ft of floor area and the maximum is 15 spaces per 1,000 sq ft of floor area.

As per information provided by the applicant for the preapplication conference for the proposed development held on January 26, 2012, there are 3 primary uses on the overall Blount campus. Manufacturing occupies approximately 300,000 sq ft; office space occupies approximately 82,200 sq ft, and a café for employees occupies approximately 10,700 sq ft. As per the standards of MMC Table 19.605.1, the minimum required number of off-street parking spaces is 506; the maximum allowable number is 1039.

As evidenced by the applicant's submittal materials, the overall Blount campus currently provides 822 off-street parking spaces. With the addition of the proposed 53 new off-street parking spaces, the new total number of spaces will be 875, which falls between the minimum number required and the maximum number allowed. This standard is met.

E. MMC 19.606 Parking Area Design and Landscaping

i. MMC 19.606.1 establishes the required dimensions for off-street parking spaces and their associated drive aisles. Spaces angled at 90 degrees must provide a minimum width of 9 ft and minimum depth of 18 ft, with drive aisles a minimum of 22 ft wide for one-way or two-way traffic. Parallel spaces must be at least 8.5 ft wide and 22 ft long, with a 12-ft-wide drive aisle for one-way traffic.

As evidenced by the applicant's submittal materials, all proposed parking spaces and drive aisles meet the applicable standards.

ii. MMC 19.606.2 establishes standards for landscaping for off-street parking areas.

a. MMC 19.606.2.C provides standards for perimeter landscaping, including a minimum planting-area width of 8 ft where adjacent to the public right-of-way or 6 ft where abutting another property. Perimeter landscaping areas must include 1 tree planted at least every 40 lineal ft.

As evidenced by the applicant's submittal materials, all perimeter landscaping areas have a minimum width of 8 ft where adjacent to the public right-of-way and 6 ft where adjacent to another property. The applicant's landscaping plan shows trees being planted at least 1 per every 40 lineal ft where adjacent to the public right-of-way on SE International Way. No trees are specifically shown within the perimeter area adjacent to the right-of-way on Highway 224; this area forms part of the mitigation planting area where native trees and shrubs will be installed according to the standards of MMC 19.402.11.B. The plant-spacing requirements provided in MMC 19.402.11.B.4 ensure that this standard will be met.

b. MMC 19.606.2.D provides standards for interior landscaping, including a requirement for at least 25 sq ft of interior landscaping for each parking space, with planting areas at least 120 sq ft in area. Interior landscaping areas shall be at least 6 ft wide and take the form of either divider medians between opposing rows of parking or landscaped islands in the middle or at the ends of parking rows. For landscaped islands, at least 1 tree shall be planted per island.

The proposed development will establish 53 new parking spaces, with a requirement to provide at least 1,325 sq ft of interior landscaping. As evidenced by the applicant's submittal materials, approximately 1,500 sq ft of landscaping area will be provided in 7 landscaped islands that are each at least 6 ft wide and with a minimum landscaping area of 120 ft. The applicant's landscaping plan shows 1 tree being planted in each landscaped island, except within the area of the stormwater detention pond. A condition is established to ensure that at least one species-appropriate tree will be planted along the edge of the stormwater detention pond. As conditioned, this standard is met.

c. MMC 19.606.2.E provides additional standards for parking area landscaping, including an encouragement to preserve existing trees, an allowance for required landscaping areas to serve as stormwater management facilities, and an allowance for pedestrian walkways within required landscaping areas if the landscape buffer is at least 2 ft wider than required.

As evidenced by the applicant's submittal materials, most of the existing trees on the site will be removed as part of the proposed development, including 10 trees within the proposed perimeter landscaping area adjacent to the Highway 224 right-of-way. The applicant's narrative indicates that an effort will be made to preserve 7 of the trees that are close to but outside the permanent impact area. As noted in Finding 7-E-ii(b), a condition is established to ensure that removal of any of the 10 existing trees within the mitigation area along the southern edge of the new parking area is mitigated on a one-for-one basis.

The applicant's landscaping plan includes a stormwater detention pond and bioswale area to handle stormwater runoff from the proposed development. As per MMC 19.606.2.E.4, these areas may be counted as the landscaping required for the new parking area.

The applicant has proposed a pedestrian walkway within a portion of the perimeter landscaping area adjacent to International Way. Accordingly, the applicant's submittal materials show that the total buffer area in that location is 10 ft wide instead of 8 ft.

The applicable standards of MMC 19.606.2.E are met.

As proposed and conditioned, the proposed development meets the applicable landscaping standards of MMC 19.606.2.

iii. MMC 19.606.3 provides additional design standards for off-street parking areas, including requirements for paving and striping, wheel stops, drive aisles, pedestrian access, internal circulation, and lighting.

a. MMC 19.606.3.A requires that off-street parking areas have a durable and dust-free hard surface, with striping to delineate parking spaces.

As evidenced by the applicant's submittal materials, the new parking area will be paved and striped. This standard is met.

b. MMC 19.606.3.B requires that parking bumpers or wheel stops be provided to prevent vehicles from encroaching into public right-of-way, adjacent landscaped areas, or pedestrian walkways. Curbing may substitute for wheel stops.

As evidenced by the applicant's submittal materials, wheel stops will be provided in the parking spaces adjacent to the perimeter landscaping along International Way. A condition is established to ensure that wheel stops are provided in the parking spaces adjacent to the eastern perimeter landscaping area and in the

interior spaces adjacent to the 12-ft-wide drive aisle. As conditioned, this standard is met.

c. MMC 19.606.3.C provides standards for site access and drive aisles.

As proposed, no new access to International Way will be created. Access to International Way from the new parking area will be provided through the existing accesses to the adjacent parking area to the west. As evidenced by the applicant's submittal materials, the proposed drive aisles meet the applicable width standards of 12 ft for parallel and 22 ft for 90-degree spaces. This standard is met.

d. MMC 19.606.3.D references the standards established in MMC 19.504.10 for on-site walkways and circulation. Specifically, on-site walkways through off-street parking areas must be continuous, lead to a building entrance, and in compliance with the design standards of MMC 19.504.10.E. In addition, no parking space shall be farther than 100 ft from a building entrance or compliant walkway.

As evidenced by the applicant's submittal materials, a 5-ft-wide striped pedestrian walkway through the middle of the new parking area will connect it to a 5-ft-wide pedestrian sidewalk leading to an existing crosswalk across International Way and on to the main entrance of the Blount office building. All new parking spaces are within approximately 100 ft of the striped pedestrian walkway. As noted in Finding 8-E-iii(f), a condition is established to require the submittal of a more detailed lighting plan, to ensure that the pedestrian walkways are sufficiently illuminated. As conditioned, this standard is met.

e. MMC 19.606.3.E establishes standards for internal circulation, including connections to adjacent parking areas.

As proposed, the new parking area will be adjacent to an existing off-street parking lot to the west. The new parking area will connect directly to the adjacent parking lot and will access International Way through the existing access on the adjacent parking lot. This standard is met.

f. MMC 19.606.3.F establishes standards for lighting off-street parking areas with more than 10 spaces.

As proposed, the new parking area will be lighted to provide a minimum illumination level of 0.5 foot candles at ground level. However, the applicant's submittal materials provide no detail about the new light fixtures, shielding to prevent glare, or distribution of illumination across the project area. A condition is established to ensure that the proposed lighting adequately illuminates the new parking area and associated pedestrian walkways, minimizes light trespass, and avoids shining directly into WQR and/or HCA areas. As conditioned, this standard is met.

As proposed and conditioned, the applicable standards of MMC 19.606.3 are met.

As evidenced by the applicant's submittal materials and as conditioned, the applicable parking area design and landscaping standards of MMC 19.606 are met.

The Planning Commission finds that, as conditioned, the proposed development meets all applicable standards of MMC 19.600.

9. MMC 19.700 Public Facility Improvements

The purpose of MMC 19.700 is to ensure that development provides public facilities that are safe, convenient, and adequate in rough proportion to their public facility impacts. As per

MMC 19.702.3.G, public capital improvement projects are exempt from the standards of MMC 19.700.

The proposed development does not constitute construction of any structures; therefore, the Planning Commission finds that the standards of MMC 19.700 are not applicable.

10. The City distributed the subject application to the following City departments and agencies for review and comment on July 19, 2012: City of Milwaukie Building and Engineering Departments; Clackamas County Fire District #1; North Clackamas Chamber of Commerce; and ESA, the City's on-call natural resource consultant. The City mailed notice of the initial public hearing to property owners and current residents at all properties within 300 ft of the subject property on August 8, 2012.

    The following is a summary of the comments received by the City:

    - **Brad Albert, City of Milwaukie Engineering Department:** The provisions of MMC 19.700 Public Facility Improvements are not applicable to the proposed development.

      Response: This comment has been incorporated into the Findings.

    - **Sarah Hartung, Senior Biologist with ESA:** As the City's on-call natural resource consultant, ESA reviewed the application; assessed the existing conditions, alternatives analysis, and proposed mitigation plan; and prepared a report summarizing the analysis.

      Response: The ESA analysis has been incorporated into the Findings.

    - **Mike Boumann, Clackamas County Fire District #1:** No comments on the proposal.

    - **Tom Larsen, City of Milwaukie Building Official:** No comments on the proposal.

Recommended Conditions of Approval

1. Prior to issuance of any building or other permits for development on the subject property, the following shall be resolved:
   A. Unless otherwise required by these conditions of approval, all plans submitted for development permits for the subject property shall be substantially similar to those submitted as part of the final land use application (stamped received on July 17, 2012, for most of the applicant's materials).
   B. Provide a construction management plan that shows the following:
      i. Demarcation of the Water Quality Resource (WQR) and Habitat Conservation Area (HCA) and the location of disturbance areas (temporary and permanent)
      ii. Erosion and sediment control measures
      iii. Measures to protect trees and other vegetation located within the WQR and/or HCA but outside of the approved disturbance area. This includes tree protection fencing around the 10 trees located within the proposed mitigation area along the southern edge of the new parking area. The applicant, in consultation with Planning staff, shall verify based on field inspection whether any of these 10 trees can be preserved. Tree protection fencing shall be installed around the drip line of trees to be preserved.

         Where a tree's drip line extends into a temporary or permanent disturbance area, or where the applicant otherwise demonstrates that construction activities are likely to damage a tree beyond the point of saving it or that a tree presents a safety hazard, protective fencing is not required for that tree, the tree may be removed, and the applicant shall mitigate for its loss as noted in Condition 2-A-v.
      iv. Location of any site access (ingress and egress) that construction or mitigation equipment will use
      v. Any equipment and material staging or stockpile areas
   C. Submit a stormwater management plan prepared by a qualified professional engineer with required development/building permits as part of the proposed development. The plan shall conform to Section 2 – Stormwater Design Standards of the City of Milwaukie Public Works Standards.
      i. The stormwater management plan shall demonstrate that the post-development runoff does not exceed the pre-development runoff, including any existing stormwater management facilities serving the development site.
      ii. The stormwater management plan shall demonstrate compliance with water quality standards in accordance with the City of Portland Stormwater Management Manual.
      iii. Development/building permits will not be issued for construction until the stormwater management plan has been approved by the City of Milwaukie.
   D. Provide a final mitigation plan that includes the following details:
      i. Clear indication of the person responsible for the mitigation work, including primary contact, phone number, and address

ii. Demarcation of all planting areas for mitigation of temporary and permanent disturbances to the WQR and HCA

iii. Updated timeline for removal of invasive nonnative vegetation and for planting of mitigation plants, including a schedule for watering, maintenance, monitoring, and replacement of plants. The timeline shall note that monitoring and maintenance will continue for at least 2 years from the time of planting, to ensure 80% survival of the mitigation plantings. Throughout this 2-year establishment period, nuisance species plants shall be removed and/or otherwise controlled within the mitigation area.

iv. Revised list of native plantings for flat areas, in particular replacing Garry oak (*Quercus garryana*) with one or more of the following, more shade-tolerant tree species: Big-leaf maple (*Acer macrophyllum*), Grand fir (*Abies grandis*), Western red cedar (*Thuja plicata*), or Oregon ash (*Fraxinus latifolia*)

v. Notation that the entire mitigation area (flat and sloped areas) will be planted or seeded with native grasses or other native ground cover species to achieve 100% surface coverage after mitigation trees and shrubs have been installed. Bark mulch shall not be used to achieve 100% surface coverage.

vi. Notation that a minimum of 3 pieces of large wood from trees removed from within the WQR or HCA shall be placed within the western end of the mitigation area, to provide immediate nutrients and large woody and organic material for habitat or other ecological benefit. For purposes of these conditions, "pieces of large wood" shall mean logs at least 20 ft long and at least 15 in diameter at breast height.

vii. Contingency plan for ensuring that work will be completed as proposed

E. Provide a lighting plan sufficient to demonstrate that the applicable standards of MMC 19.606.3.F and MMC 19.504.10.E are met. These standards include, but are not limited to, adequately illuminating the new parking area and associated pedestrian walkways, minimizing light trespass, and avoiding shining directly into WQR and/or HCA areas.

2. Prior to use of the subject parking area, the following shall be resolved:

A. Implement the final mitigation plan for disturbances to the WQR and HCA, including the following tasks:

i. Remove all invasive nonnative vegetation and any debris or noxious material from within designated mitigation planting areas.

ii. Install trees, shrubs, and ground cover according to the details provided in the final mitigation plan and in accordance with the standards provided in MMC 19.402.11.B. This includes standards for plant size, spacing, and survival.

iii. Provide a signed statement from the responsible party identified in Condition 1-D-i, stating that all mitigation plantings have been installed according to the final mitigation plan.

iv. As outlined in Condition 1-D-vi, demonstrate that a minimum of 3 pieces of large wood, from trees removed from within the WQR or HCA, are placed within the western end of mitigation area.

v. Provide one-for-one tree replacement of any trees removed that were protected as noted in Condition 1-B-iii, using shade-tolerant native species trees and sized according to the standards of MMC 19.402.11.B.3.

B. Install wheel stops in all 90-degree-angle parking spaces, to prevent vehicle encroachment into required landscaping areas or drive aisles.

C. Plant at least 1 tree within the required interior landscaping area along the edge of the stormwater detention pond, using a species suitable for planting in wet locations.

3. The land use approval shall expire and become void unless both of the following steps are completed:

A. Obtain all necessary development permits and start construction within 2 years of land use approval.

B. Pass final inspection within 4 years of land use approval.

Blount International
Parking Addition
Land Use Application

Compass Engineering, Inc.
4107 SE International Way Suite 705
Milwaukie Or 97222
Phone: 503.653.9093
Job No: 6992

RECEIVED

JUL 17 2012

CITY OF MILWAUKIE
PLANNING DEPARTMENT

Narrative

Blount International World Headquarters
Parking Lot Narrative

The proposal is to expand the existing southern parking area that serves the Blount Industrial, world headquarters building at 4909 SE International Way in Milwaukie Oregon. This is a portion of tax lot 300. Tax lot 300 also included the offices and parking areas adjacent to SE International Way and the adjacent landscaping. In spite of significant efforts by the owner to reduce the need for onsite parking, there is a continued shortage of available parking at the site. The shortage is evident by the number of vehicles that are parked along the International Way shoulders. The shoulder parking creates a pedestrian safety issue and traffic congestion problem as people stop, park and egress vehicles on a street without proper sidewalks or parking areas.

The area of the proposed parking lot expansion is located South of SE International Way, adjacent to the existing parking lot. The site is presently vacant with a few trees, no shrubs and a weedy grass mix.

The proposed parking addition will consist of constructing a 52 space parking lot with the required landscaping and drainage facilities.

MMC 19.300 **Base Zones**
The site is located in the Business Industrial Zone (BI). The use is permitted in this zoning district.

19.316.6 **Standards**
A. Lot size – None
B. Front yard – No building is proposed
C. Side yard – None
D. Rear yard – None
E. Off-street parking – See MMC 19.600 below
F. Site access – The proposed parking area will use the existing driveways spaced at 350 feet, which is in excess of the 150 foot requirement.
G. Height restrictions – No building is proposed
H. Landscaping – The existing site (tax lot 300) is 8.44 acres in size. Approximately 3.5 acres (40%) of the site is landscaped. The portion of the site affected by the parking lot expansion will have over 25% of the area landscaped.
I. Screening and outside storage – Outside storage is not proposed.
J. Building siting and design – No building is proposed
K. Nuisances – The proposal will not produce a nuisance.

MMC 19.400 **Overlay Zones and Special Areas**
The site is subject to the Natural Resources provisions of MMC 19.402. The site contains areas that are mapped as water quality resources (WQR) and habitat conservation areas (HCA). The impacts to the Natural Resource areas are addressed in the report prepared by Environmental Technology Consultants and is submitted with this application.

MMC 19.500 **Supplemental Development Regulations**
The site design standards in MMC 19.504.10 require a system of walkways that encourages safe and convenient pedestrian movement within and through the development site. The

proposed parking lot will include safe walking paths from the parking area to the building. This will be reviewed during the development (DEV) review process

MMC 19.600 **Off-street Parking and Loading Standards and Requirements**

MMC 19.605 **Vehicle Parking Quantity Requirements**

As identified in the pre application conference, the number of parking spaces with this addition complies with the City standards.

MMC 19.606 **Parking Area Design and Landscaping**

MMC 19.606.1 **Parking Space and Aisle Design**

Parking aisles are one way and 12 feet wide for parallel parking and 22 feet wide for head in parking. The parking spaces are 8.5 feet wide and 22 feet long for parallel parking and 9 feet wide and 22 feet long for head in parking.

MMC 19.606.2 **Landscaping**

The design as proposed provides 24.6% of the area to be landscaped. The perimeter landscape strip dimensions are required to be 8 feet for lot lines abutting a right of way and 6 feet for lot lines abutting another property. The landscape strip along International Way is 10 feet and along Highway 214 is a minimum of 15 feet. The landscape strip along the East lot line is 6 feet wide. The West side of the proposed parking lot abuts a share parking area and does not require a landscape strip.

MMC19.606.2.D **Interior Landscaping**

The code required 25 feet of interior landscaping per parking space. For 52 spaces 1,300 square feet of interior landscaping is required. This is provided by seven landscape islands with a total of 1,356 square feet of interior landscape area. Each landscape island is at least 8-feet wide and 18-feet deep for a net area of 120 square feet each. Landscape areas are a minimum of 7 feet wide where 6 feet is required. Each island will have one tree as required. The interior islands will be placed such that there will be no more than 10 spaces in a row where the code requires there are no more than 15 spaces in a row without an island.

MMC 19.606.3.B **Wheel Stops**

Wheel stops will be provided as shown on the site plan to prevent vehicles from encroaching on landscape areas or pedestrian walkways.

MMC 19.606.3.E **Pedestrian Access and Circulation**

The pedestrian walkway shown on the plan will be a hard surface constructed of asphaltic concrete or Portland cement concrete. The walkways are a minimum of 5 feet wide. The walkways in the asphaltic concrete area will be painted with 4 inch wide strips. The walking areas, as well as the entire parking lot, will be lighted for safety.

MMC 19.606.3.F **Lighting**

The parking area will be provided with lighting to provide a minimum illumination level of 0.5 foot candles at ground level.

MMC 19.608 through 19.611 As identified in the pre-application conference if loading areas, bicycle parking, carpool and vanpool parking or parking structures are proposed they must meet the standards of MMC 19.608 – 19.611. as proposed, the parking area will not need to meet these standards.

MMC 19.606.3 **Additional Design Standards**

Pedestrian Access and Circulation is addressed by providing a walking area that is no more that 100 feet from any parking space in the new parking lot. The walkway will connect to the existing walkway North of International Way that connects to the buildings.

MMC 19.700 **Public facility standards and requirements**
As stated in the pre application conference, the Engineering Department has determined that this chapter is not triggered by the proposed project.

MMC 19.1000 **Review Procedures**
The proposal is subject to two City reviews. The Natural Resource (NR) review is a Type III review and the Development (DEV) review is a type I review.

CITY OF MILWAUKIE

PreApp Project ID #: 12-001PA

PRE-APPLICATION CONFERENCE REPORT

This report is provided as a follow-up to a meeting that was held on 1/26/2012 at 10:00AM

Applicant Name: **JOHN ARAND**

Company: **BLOUNT INTERNATIONAL**

Applicant 'Role': Owner

Address Line 1: 4909 SE INTERNATIONAL WAY

Address Line 2:

City, State Zip: MILWAUKIE OR 97222-4679

Project Name:

Description:

ProjectAddress: **4909 SE INTERNATIONAL WAY**

Zone: Business Industrial Zone (BI), HCA and WQR overlays

Occupancy Group:

ConstructionType:

Use: Manufacturing

Occupant Load:

AppsPresent: John Arand, Blount International, Norman Harker and Stacy Stubblefield, Compass Engineering

Staff Attendance: Katie Mangle, Li Alligood, Tom Larsen, Brad Albert, Rob Livingston

BUILDING ISSUES

ADA: There are currently 10 ADA spaces, which should be more than adequate. Plans shall show a count of the total number of all spaces for the entire facility. Provide striping wherever the access crosses vehicular trafic. A minimum of (2) van accessible sapces shall be designated "wheelchair Only"- one in front, one in back lot.

Structural:

Mechanical:

Plumbing: Permit required if stormwater is piped.

Plumb Site Utilities:

Electrical:

Notes: Grading and Erosion Control permits required. Applications available on our website. One paper copy and one PDF. Applications may be also made online at www.buildingpermits.oregon.gov

Please note all drawings must be individually rolled. If the drawings are small enough to fold they must be individually folded.

FIRE MARSHAL ISSUES

Fire Sprinklers:

Fire Alarms:

Fire Hydrants:

Turn Arounds:

Addressing:

Fire Protection:

Fire Access:

Hazardous Mat.:

Fire Marshal Notes: The Fire District has no comments on this proposal.

PUBLIC WORKS ISSUES

Water: N/A

Sewer: N/A

Storm: Submission of a storm water management plan by a qualified professional engineer is required as part of the proposed development. The plan shall conform to Section 2 - Stormwater Design Standards of the City of Milwaukie Pubic Works Standards.
The storm water management plan shall demonstrate that the post-development runoff does not exceed the pre-development, including any existing storm water management facilities serving the development property. Also, the plan shall demonstrate compliance with water quality standards. The City of Milwaukie has adopted the City of Portland 2008 Stormwater Management Manual for design of water quality facilities.
All new impervious surfaces, including replacement of impervious surface with new impervious surfaces, are subject to the water quality standards. See City of Milwaukie Public Works Standards for design and construction standards and detailed drawings.

The storm SDC is based on the amount of new impervious surface constructed at the site. One storm SDC unit is the equivalent of 2,706 square feet of impervious surface. The storm SDC is currently $1138.37 per unit. The storm SDC will be assessed and collected at the time the building permits are issued.

Street: The proposed development site fronts the south side SE International Way, which is under the jurisdiction of the City of Milwaukie. The proposed development site also fronts the north side of State Highway 224, which is under the jurisdiction of the Oregon Department of Transportation.

Frontage: N/A

Right of Way: N/A

Driveways: N/A

Erosion Control: Per Code Section 16.28.020(C), an erosion control permit is required prior to placement of fill, site clearing, or land disturbances, including but not limited to grubbing, clearing or removal of ground vegetation, grading, excavation, or other activities, any of which results in the disturbance or exposure of soils exceeding five hundred square feet.

Code Section 16.28.020(E) states that an erosion control permit is required prior to issuance of building permits or approval of construction plans. Also, Section 16.28.020(B) states that an erosion control plan that meets the requirements of Section 16.28.030 is required prior to any approval of an erosion control permit.

Traffic Impact Study: N/A

PW Notes: N/A

PLANNING ISSUES

Setbacks: Business Industrial Zone BI: Front yard 20 ft; no required side yard or rear yard except as required by MMC 19.501.2.A.

Landscape: 15% of the site must be landscaped, except for sites adjacent to Hwy 224, which shall provide landscaping to 20% of the site. This should consist of a variety of lawn, trees, shrubbery, and ground cover. This site is adjacent to Hwy 224 and is subject to the 20% landscaping requirement.

Parking: The City's parking requirements are located in Chapter 19.600. Per the applicant, the current uses include: 300,000 sf manufacturing; 12,200 sf office; 10,700 sf eating and drinking establishment; and 70,000 sf office. Minimum parking required on site for these uses is 507 spaces; maximum parking permitted on site is 1040 spaces. The additional parking proposed would bring the total of onsite-spaces to 873 spaces.

The City's parking requirements are located in MMC 19.600. Any parking or loading area developed to serve existing uses must meet the standards of MMC 19.604 regarding parking area design and landscaping. If loading areas, bicycle parking, carpool and vanpool parking, or parking structures are proposed as part of the development, they must meet the standards of MMC 19.606-19.611. As proposed, the parking area would not need to meet the standards of MMC 19.606-19.611.

Transportation Review: The City's transportation requirements are located in MMC 19.700. The Engineering Department has determined that this chapter is not triggered by the proposed project.

Application Procedures: The proposal is subject to Natural Resource (NR) review and Development (DEV) review.

Natural Resource (NR): NR approval is required for the proposed development. The application is reviewed through a Type III review per MMC 19.1006, and the application fee is $1,700. The approval criteria for NR applications are in MMC 19.402.12.

Development (DEV): After approval of the NR application, and before start of construction, DEV approval will be required. The application is reviewed through a Type I review per MMC 19.1004, and the application fee is $150. The application requirements and approval criteria for a DEV application

are in MMC 19.906.

For the City's initial review, the applicant should submit 5 complete copies of the application, including all required forms and checklists. A determination of the application's completeness will be issued within 30 days. If deemed incomplete, additional information will be requested. If deemed complete, additional copies of the application will be required for referral to other departments, the Neighborhood District Association (NDA), and other relevant parties and agencies. City staff will inform the applicant of the total number of copies needed.

Type III applications are quasi-judicial in nature and are decided by the Planning Commission at a public hearing. The Planning Commission hears land use applications on the second and fourth Tuesdays of every month, and completed applications need to be submitted to the Planning Department no later than 45 days prior to the target Planning Commission hearing. In general, staff recommends that applications be submitted one to two weeks before the 45-day deadline in order to ensure that there is time to make the applications complete if they are initially deemed incomplete. Once the Planning Commission renders a decision, there is a fifteen calendar-day appeal period. Building permits will be accepted for review only after the appeal period for all land use decisions has expired.

Type I applications are administrative in nature and are decided by the Planning Director. The timeline for review and approval is generally 10business days.

Land use application submission materials are listed below for your convenience. Please refer to the handouts distributed at the pre-application conference for more detailed information.

1. All applicable land use applications forms with signatures of property owners.
2. All applicable land use application fees.
3. Completed and signed “Submission Requirements” form.
4. Completed and signed “Site Plan Checklist and Procedures” form.
4. 5 copies of an existing conditions and a proposed conditions site plan, both to scale. These two site plans can be combined onto one site plan. Once the application is deemed complete, additional copies will be requested for distribution to City departments, applicable governmental agencies, and the neighborhood district association for review.
5. Detailed narrative describing compliance with all applicable code sections.

Natural Resource Review: The property contains mapped habitat conservation areas (HCA) and water quality resource areas (WQR) and is subject to natural resource review. See ‘Application Procedures.’

Lot Geography: The site is composed of 5 tax lots, and is bisected to the south by International Drive, which runs diagonally from southwest to southeast. The eastern boundary of the site is jagged and uneven. The remainder of the site is generally rectilinear in shape.

Planning Notes: 1) As proposed, the parking plan does not meet the pedestrian walkway and lighting standards. No parking space shall be more than 100’ from a pedestrian walkway that meets the standards of 19.504.10.E. The pedestrian walkway can be located within perimeter/interior landscaping if the landscaping is at least 2’ wider than required. Also, lighting is required in parking lots with more than 10 spaces. Parking area design and landscaping standards are in MMC 19.606.

2) Additional information is needed for thorough evaluation of the parking lot design, including: wheel stops or demonstration that parked vehicles will not encroach into the minimum required width for landscaped areas; landscaping plans for the perimeter and interior landscaping areas; the location and design of lighting; and the pedestrian walkway.

3) The landscaped divider median shown in the submitted plans can function as an infiltration planter. It

must meet design and landscaping standards of MMC 19.606.

4) An alternatives analysis is required for the NR application. The Planning Commission will likely be interested in which alternative sites that were considered and why the proposed site was chosen despite its location within a natural resource area.

5) The preapplication conference is valid for purposes of submitting future land use applications as described in 19.1002.4. In general, a preapplication conference is valid for 2 years.

6) The Milwaukie Municipal Code is available online at http://www.qcode.us/codes/milwaukie/

ADDITIONAL NOTES AND ISSUES

County Health Notes:

Other Notes:

This is only preliminary preapplication conference information based on the applicant's proposal and does not cover all possible development scenarios. Other requirements may be added after an applicant submits land use applications or building permits. City policies and code requirements are subject to change. If you have any questions, please contact the City staff that attended the conference (listed on Page 1). Contact numbers for these staff are City staff listed at the end of the report.

Sincerely,

City of Milwaukie Development Review Team

BUILDING DEPARTMENT
Tom Larsen - Building Official - 503-786-7611
Bonnie Lanz - Permit Specialist - 503-786-7613

ENGINEERING DEPARTMENT
Gary Parkin - City Engineer - 503-786-7601
Brad Albert - Civil Engineer - 503-786-7609
Zach Weigel - Civil Engineer - 503-786-7610
Jason Rice - Civil Engineer - 503-786-7605
Matt Palmer - Associate Engineer - 503-786-7602

COMMUNITY DEVELOPMENT DEPARTMENT
Jeanne Garst - Administrative Supervisor - 503-786-7655
Marcia Hamley - Admin Specialist - 503-786-7656
Blanca Marston -Admin Specialist - 503-786-7600
Alicia Martin -Admin Specialist - 503-786-7600

PLANNING DEPARTMENT
Scot Siegel - Interim Planning Director - 503-786-7653
Brett Kelver - Associate Planner - 503-786-7657
Ryan Marquardt - Associate Planner - 503-786-7658
Li Alligood - Associate Planner - 503-786-7627

CLACKAMAS FIRE DISTRICT
Mike Boumann - Lieutenant Deputy Fire Marshal - 503-742-2673

BLOUNT INTERNATIONAL PARKING LOT
IMPACT EVALUATION AND ALTERNATIVES ANALYSIS
Land Use Application File # NR-12-05

Evaluated by: _____ JULY 16, 2012
John McConnaughey DATE

PWS ETHICS JOHN McCONNAUGHEY, MSc 002009 PROFESSIONAL WETLAND SCIENTIST SWS PCP EDUCATION EXPERIENCE

Prepared for:
Blount, Inc
4909 SE International Way
Milwaukie, OR 97222-2127

Environmental Technology Consultants
A Division of Sisul Enterprises, Inc.
PO Box 821185
Vancouver, WA 98662
(360) 696-4403 Fax: (503) 657-5779
WA Landscape Contractors License #: ENVIRTCO23RB
Web: www.etcEnvironmental.net
Email: etc@etcEnvironmental.net

environmental technology Consultants
"Creating Tomorrow's Environment - Today"

TABLE OF CONTENTS

Cover Photo Sign for the world headquarters building for Blount Inc., located at 4909 SE International Way in Milwaukie, Oregon. One of the company's parking lots is in the back ground.

REVISIONS

In a letter from the City of Milwaukie Associate Planner Brett Kelver dated June 6, 2012, Blount was informed that their original land use application was deemed incomplete. The letter and in a subsequent meeting the inadequacies of the original application were discussed. This revised report addresses those concerns.

INTRODUCTION

Blount International, Inc. is a leading manufacturer of equipment for the global forestry, garden and construction industries with Corporate headquarters located at 4909 SE International Way. They have approximately 1,800 employees in Oregon, 3,000 in the U.S., and 4,500 worldwide. They are Clackamas County's largest private employer. 2011 total company revenue was $832M.

Blount International Inc. has identified the lack of adequate parking areas as a serious concern that needs to be addressed if the company is to continue employment at their present levels at it's Milwaukie facility, which is the company's international headquarters. The company has plans for expansion, which will exacerbate the existing problem.

A part of the proposed solution is to create an additional parking area in the SE corner of the site by expanding an existing parking lot. This report addresses this new parking area. Other parts of the solution to the parking problem is to increase use of car pooling, mass transit, and other alternatives. Blount currently participates in DEQ's Employee Commute Options program to reduce the number of vehicle trips and limit the need for employee parking. Numerous employees participate in one or more of the following commuting methods to reduce trips including carpooling, vanpooling, riding TriMet (bus, Max or a combination of the two), biking to work, walking to work, telecommuting and working a compressed work week.

Need for more parking space: The need for more parking is evident when driving on International Way in front of the Blount campus on a week day, (Photo 1). The existing lots are full and even spaces not intended as parking areas are occupied. There is some street parking, and Blount employees have to compete with employees from Dave's Killer Bread and Bob's Red Mill for these limited spaces. The street parking creates a pedestrian safety issue and a traffic congestion issue, as people stop, park, and egress vehicles on a street without proper sidewalks or parking areas.

Approximately 1100 people are employed at the 4909 SE Int'l Way campus and another 700 are employed locally at 3901 SE Naef Rd, Milwaukie Oregon location. Blount has hired about 100 full time employees in the last 12 months plus additional temporary employees at their 4909 SE Int'l Way location. Parking is in short supply, especially for the administration building where 60 full time employees were hired in the past 12 months, plus additional temporary employees after renovating the administration building in 2011.

The campus on International Way has four parking lots serving the site with a total of 822 parking spaces. The need for parking varies with the shift and number of temporary employees hired, the day shift is usually the peak usage time, with full time, temporary, and contractors all vying for parking.

Code Requirements. The area selected for the parking lot expansion is mostly within areas mapped as Habitat Conservation Areas (HCA), and the Vegetated Corridor of an identified Water Quality Resource Area, (WQR).

A. Code Requirements from 19.402 Natural Resources.

Below are copied pertinent sections 19.402.

19.402.12.C. Limitations and Mitigation for Disturbance of HCAs

1. Discretionary Review to Approve Additional Disturbance within an HCA

An applicant seeking discretionary approval to disturb more of an HCA than is allowed by Subsection 19.402.11.D.1 shall submit an Impact Evaluation and Alternatives Analysis, as outlined in Subsection 19.402.12.A, and shall be subject to the approval criteria provided in Subsection 19.402.12.B.

19.402.12.A. Impact Evaluation and Alternatives Analysis

An impact evaluation and alternatives analysis is required to determine compliance with the approval criteria for general discretionary review and to evaluate development alternatives for a particular property. A report presenting this evaluation and analysis shall be prepared and signed by a knowledgeable and qualified natural resource professional, such as a wildlife biologist, botanist, or hydrologist. At the Planning Director's discretion, the requirement to provide such a report may be waived for small projects that trigger discretionary review but can be evaluated without professional assistance.

The alternatives shall be evaluated on the basis of their impact on WQRs and HCAs, the ecological functions provided by the resource on the property, and off-site impacts within the subwatershed (6th Field Hydrologic Unit Code) where the property is located. The evaluation and analysis shall include the following:

1. Identification of the ecological functions of riparian habitat found on the property, as described in Subsection 19.402.1.C.2.

2. An inventory of vegetation, sufficient to categorize the existing condition of the WQR per Table 19.402.11.C, including the percentage of ground and canopy coverage materials within the WQR.

3. An assessment of the water quality impacts related to the development, including sediments, temperature and nutrients, sediment control, and temperature control, or any other condition with the potential to cause the protected water feature to be listed on DEQ's 303(d) list.

4. An alternatives analysis, providing an explanation of the rationale behind choosing the alternative selected, listing measures that will be taken to avoid and/or minimize adverse impacts to designated natural resources, and demonstrating that:

a. No practicable alternatives to the requested development exist that will not disturb the WQR or HCA.

b. Development in the WQR and/or HCA has been limited to the area necessary to allow for the proposed use.

c. If disturbed, the WQR can be restored to an equal or better condition in accordance with Table 19.402.11.C; and the HCA can be restored consistent with the mitigation requirements of Subsection 19.402.11.D.2.

d. Road crossings will be minimized as much as possible.

5. Evidence that the applicant has done the following, for applications proposing routine repair and maintenance, alteration, and/or total replacement of existing structures located within the WQR:

a. Demonstrated that no practicable alternative design or method of development exists that would have a lesser impact on the WQR than the one proposed. If no such practicable alternative design or method of development exists, the project shall be conditioned to limit its disturbance and impact on the WQR to the minimum extent necessary to achieve the proposed repair/maintenance, alteration, and/or replacement.

b. Provided mitigation to ensure that impacts to the functions and values of the WQR will be mitigated or restored to the extent practicable.

6. A mitigation plan for the designated natural resource that contains the following information:

a. A description of adverse impacts that will be caused as a result of development.

b. An explanation of measures that will be taken to avoid, minimize, and/or mitigate adverse impacts to the designated natural resource; in accordance with, but not limited to, Table 19.402.11.C for WQRs and Subsection 19.402.11.D.2 for HCAs.

c. Sufficient description to demonstrate how the following standards will be achieved:

(1) Where existing vegetation has been removed, the site shall be revegetated as soon as practicable.

(2) Where practicable, lights shall be placed so that they do not shine directly into any WQR and/or HCA location. The type, size, and intensity of lighting shall be selected so that impacts to habitat functions are minimized.

(3) Areas of standing trees, shrubs, and natural vegetation will remain connected or contiguous; particularly along natural drainage courses, except where mitigation is approved; so as to provide a transition between the proposed development and the designated natural resource and to provide opportunity for food, water, and cover for animals located within the WQR.

d. A map showing where the specific mitigation activities will occur. Off-site mitigation related to WQRs shall not be used to meet the mitigation requirements of Section 19.402.

e. An implementation schedule; including a timeline for construction, mitigation, mitigation maintenance, monitoring, and reporting; as well as a contingency plan. All in-stream work in fish-bearing streams shall be done in accordance with the allowable windows for in-water work as designated by ODFW.

MATERIALS AND METHODS

For this investigation ETC used Wetland Biologist John McConnaughey, who performed the site review according to the procedures outlined in Milwaukie Municipal Code chapter 19.402.

Qualifications of John McConnaughey, PWS Stamp #2009

John McConnaughey is the Senior Fisheries Biologist for Environmental Technology Consultants. He has 20 years experience working with fisheries and fish habitat issues in the Northwest, Alaska and the South Pacific. He is skilled in sampling design, salmon life history analysis, habitat utilization, and analysis of salmon recovery issues.

In 2010 Mr. McConnaughey also completed his 5 year internship and studies to become a registered Professional Wetland Scientist with the Society of Wetland Scientists. He has authored a number of wetland delineation studies, habitat evaluation studies, and associated development permits for projects in six counties and 14 local jurisdictions in NW Oregon and SW Washington.

He has project and administrative experience; as the lead biologist on 9 fisheries research studies, as the manager of a giant clam hatchery, and as an analyst for the Alaska Dept of Fish and Game. He is proficient with statistical and data base software, and uses analytical skills to provide reports for agencies, legislators and publication.

Methods:

The methods employed in this investigation were a modification of the standard methodology used in a routine site analysis. The entire site for the proposed parking lot was investigated. Stakes and flagging were used to mark the approximate property boundaries, and the boundaries of the parking lot to ensure the accuracy of the impact analysis. A survey produced by Compass Engineering was available that showed the locations of proposed development and also the locations and species of all trees greater than 6” diameter at chest height.

Also investigated, although less intensively were the proposed mitigation and alternate mitigation planting sites, and other undeveloped areas on the Blount property.

IMPACT EVALUATION AND ALTERNATIVES ANALYSIS

Lot 300. One of the comments on the original application was that it was not clear if the alternatives analysis considered the entire Blount campus or only lot 300, which is where the proposed parking lot is planned. The city has instructed Blount to restrict the discussion to lot 300, and not include the rest of the facility in the impact analysis.

However, as the rest of Blount's campus is in theory available for consideration as an alternative location for the parking lot, and so we felt it appropriate to include the entire campus in the alternatives analysis. But the impact analysis and mitigation plan only considers lot 300.

Alternatives Selected/Rejected:

Five alternatives were developed for consideration. Please refer to the map Figure 1 for the locations:

Alternative "A" – Selected – The proposed alternative. Alternative "A" expands the adjacent existing lot and adds 57 off street parking spaces. The protected water feature is described under the heading "Protected Water Feature" on page 9.

Alternative "A" reduces impact to the WQR by setting back as far from the resources as possible, providing a minimum 38' buffer between the edge of the parking lot and the stream, and a 15' to 32' wide planting strip along the top of the ditch. Including a 5' temporary construction disturbance , the disturbances for Alternative "A" are shown in Table 1.

Table 1. Alternative "A" Disturbed Areas (SQFT). Permanent disturbances include the paved areas of the parking lot and all internal planting areas. The temporary disturbance is a 5' construction buffer which will be planted as part of the mitigation. The total project area is about 18,787 SQFT of which 3,547 SQFT are outside the HCA boundary.			
Mapping	Permanent disturbance (SQFT)	Temporary disturbance (SQFT)	Total (SQFT)
WQR	5,662	1,320	6,982
HCA	8,085	173	8,258
OUTSIDE	3,547	0	3,547
Total	17,294	1,493	18,787

Blount's master plan for the campus has long identified this area for a future parking lot. That plan predates the City of Milwaukie's designation of WQR areas in 2011.

Alternative "B" – Rejected – Larger parking lot. Alternative "B" was to build a larger parking lot in the same area as "A", however "B" will extend further into the WQR and closer to the stream. "B" will also remove several more trees, and impact the root zone of a number of alder trees in the ditch on the ODOT property. "B" permanently disturbs about 2,558 additional sqft of WQR than does "A", and comes within 10' of the ditch, which does not leave an adequate planting strip for a planting of native vegetation between the parking lot and the ditch.

Alternative "C" – Rejected – Parking Garage. A parking garage was suggested to be built in the same area as the proposed parking lot, but outside of the WQR area. For 57 parking stalls, a two story garage would be required at an estimated cost of $2 million. There would only be room for one row of cars on each level, and ramps would take up as much room as the actual parking area. Such a garage is impractical and costs are prohibitive. Compare to alternative "A", which is expected to cost from $150,000 to $200,000.

Alternatives "D1 and D2" – Rejected – other locations. There are a couple areas, on the perimeter of the campus, both larger than "A" which are presently undeveloped, one on the Northwestern corner, the other on the Western side of the Blount campus. Both are mostly or wholly within areas mapped as WQR or HCA, and so offer no less impact to mapped WQR and HCA areas than does Alternative "A". It should be noted that D1 and D2 impact natural stream and wetland areas, whereas Alternative "A" only impacts the buffers surrounding a man made ditch.

Alternative "E" – Rejected – Future Building Site. There is an undeveloped area outside of the current mapped WQR and HCA areas that is large enough for a parking lot. Blount's master plan has reserved this area for future expansion for an office building. The master plan predates the City of Milwaukie's designation of WQR and HCA areas. If Blount were to develop this now as a parking area they would likely have to tear it out at some future date at great expense, and then petition to add parking in the Alternative "A" location anyway. If future building expansion on the campus at 4909 SE International Way is not allowed, Blount may look to relocating to one of it's other sites in the Midwest, Canada, South America or China.

Alternative "A" – Identification of Ecological Functions.

Section 19.402.12.1. The ecological functions of the riparian habitat are to be described per subsection 19.402.1.C.2. This discussion pertains to Alternative "A" unless otherwise noted.

Protected Water Feature. The protected Water Quality Resource, (WQR), is an artificially constructed drainage paralleling H-224. It does not appear on topographic quadrangle maps, nor is it in a location or direction suggested by the original topography of the area. In some jurisdictions it would be considered a "roadside ditch". The free flowing portion observed for this report is about 980' long, emerging from a culvert at 4700 SE International Way, and flows southeast along H-224, and then into another culvert at 5000 SE International Way, (Bob's Red Mill, Photo 4). From that point it is piped about 2900 feet to Mt. Scott Creek, where the culvert ends near the intersection of SE Rusk Way and H-224, (Photo 2). The WQR is in a steep ditch about 15' lower than the surrounding land areas, (Photo 3).

The permanent or seasonal question of this ditch is unresolved by our investigation. Due to the slopes and the way 19.402.15 is written it actually makes little difference whether the feature is considered as primary or secondary. We have therefore decided to consider the feature a primary feature for this permit application, but may revisit the issue in the future if there is a need.

This drainage may not be considered a jurisdictional feature by the Department of State Lands, (DSL), although we have not consulted them on this point. The text box below shows how this WQR compares with Oregon's standards for determining the jurisdictional status of a ditch. Jurisdictional features are subject to administration by the DSL:

OAR 141-085-0515
Removal-Fill Jurisdiction by Volume of Material and Location of Activity

ETC evaluated the ditch against the criteria for determining a jurisdictional status in OAR 141-085-0515 section (8) and (10), "jurisdictional and non-jurisdictional ditches". These sections are copied below in italics, with ETC's annotations in normal type.

(8) ***Jurisdictional Ditches****. Except as provided under section (9), ditches artificially created from upland are jurisdictional if they:*

(a) Contain food and game fish; and Probably not , although we have not made attempts to inventory fish or demonstrate their presence or absence.

(b) Have a free and open connection to waters of this state. A "free and open connection" means a connection by any means, including but not limited to culverts, to or between natural waterways and other navigable and non-navigable bodies of water that allows the interchange of surface flow at bankfull stage or ordinary high water, or at or below mean higher high tide between tidal waterways. No. The ditch drains into a culvert and is piped about 2900' before it empties into Mt. Scott Creek. Although fish will transverse short culverts, in my opinion 2900' is too long a pipe to be considered "free and open". There appears to be no connection with waters or wetlands upstream, although if one exists, the connection is by a culvert of at least 980'.

(10) ***Non-Jurisdictional Roadside and Railroad Ditches****. Roadside and railroad ditches that meet the*

following tests are not jurisdictional:

(a) Ten feet wide or less at the ordinary high water line; The wetted portion is about 6' wide.

(b) Artificially created from upland or from wetlands; Yes, it is artificially created, and the soils in this area are mapped as non-hydric indicating it was created from uplands.

(c) Not adjacent and connected or contiguous with other wetlands; and No – This feature is not contiguous with any natural steams or wetlands.

(d) Do not contain food or game fish. Probably not.

The City Natural Resources Map incorrectly shows the stream originating from the WQR in the NW corner of the Blount campus. I have not verified the true origin of the stream, but I have verified that the surface connection indicated in Figure 2 does not in fact exist. Rather, this area contains (from north to south) a weedy garden area, a storm water pond for Blount, and a maintained lawn and shrub area.

Blount employees report the stream is dry during summer months, although ETC has not verified this information. The ditch and stream are entirely on ODOT property where adjacent to the proposed parking lot. The ditch vegetation consists of an alder canopy layer, and Himalayan Blackberry shrub layer, and a herbaceous layer consisting mostly of some scattered sword fern, *Polystichum munitum.* There is also a significant infestation of the vine *Clematis sp*, and some minor amounts of Holly, *Ilex aquifolium*, another invasive species. Occasional Osoberry, *Oemleria cerasiformis*, and Red Elderberry, *Sambucus racemosa*, are the only native shrub species present. The plant diversity is low and dominated by invasives. Combined with the steep slope, lack of habitat features, and proximity to a freeway, and that the waterway is piped through long culverts above and blow this section, this stream and riparian area rate pretty low on just about everybody's habitat scale.

Currently the flow in this stream is continuous and unobstructed until it enters the pipe at the Bob's Red Mill property. In my opinion this stream section would be better converted to a storm water detention and filtration facility. This could be done by constructing a series of low dams, perhaps just willow fascines through the reach which would backup, slow down, and filter the water. This would increase it's functions by helping to protect Mt. Scott Creek from pollution and storm surges. It would also provide some still water habitat favored by amphibians.

Unfortunately, it is on the ODOT right-of-way and so unavailable as a mitigation area for this project.

Description of the Proposed Parking Lot Area.

The proposed parking lot area is currently vegetated with a middle aged stand of Cottonwood, Maple, Alder and a Cedar tree. The understory is a weedy grass mix that is periodically mowed. There are no significant shrubs due to mowing and weed control. Several of the trees have large invasive *Clematis sp.* Vines growing on them, (Photo 5).

There is a slight depression along International Way which had minor amounts of Soft rush, *Juncus effucius*, and Buttercup, *Ranunculous repens,* both these plants are typically found in wetland conditions in this area, (Photo 7). We therefore checked for wetland hydrology and

soils, both proved negative. The soil, although likely fill from elsewhere, is a 10YR2/2 silt loam from 0 to 18" with no hydric features, and no saturation or water table was observed to 18" even though we had recent heavy rains in the area.

Per the request from the city, ETC also reviewed the western end of the proposed parking area for wetland conditions. Two additional wetland delineation plots were taken, both proved negative for wetland conditions. Most significantly, no water table or saturation was observed in spite of above normal precipitation levels this spring.

The location of the data plots are shown in Figure 3B, and the data sheets are shown in Appendix C.

Section 19.402.12.A requires the impact evaluation to address and protect at least the following functions listed in 19.402.1.C.2:

19.402.1.C.2.a. Vegetated corridors to separate protected water features from development. The proposed parking varies in distance from the creek, from 38' at the east end to 48' at the west end. This area will be maintained as a vegetated corridor to separate the water feature (the stream) from the proposed development, (the parking lot).

From the creek to the top of the ditch is about 18', and there is about a 24' wide strip of land between the top of the ditch and the proposed parking lot. This strip is level to sloping gently away from the ditch, and forms an important feature of the buffer to help isolate the creek from the parking lot development, i.e., materials and storm water from the parking lot will flow away from the WQR rather than towards it.

The vegetation of the bench area consists of a number of medium size alder, cottonwood and maple trees, with an understory of grass that is maintained by mowing.

The proposed parking lot will leave a 24' wide strip between the top of the ditch and the parking lot, and this will be planted with native tree and shrub species. This will provide a total buffer of about 42 feet between the parking lot and the stream, 24' of which will slope away from the stream.

19.402.1.C.2.b. Microclimate and shade. That the parking lot is entirely on the NE side of the ditch, the trees in the impact area do not provide significant shade to the stream. The alder trees in the ditch do provide significant shading and microclimate, and these will not be affected by this project.

19.402.1.C.2.c. Streamflow moderation and water storage. The construction of the parking lot will create an impervious surface. Precipitation falling on the parking lot will flow NE away from the ditch to a infiltration and bioswale that will be sized as appropriate to provide detention of storm water. No direct impacts to the WQR are anticipated by this project.

19.402.1.C.2.d. Water filtration, infiltration, and natural purification. These functions are not anticipated to be affected by the proposed project.

19.402.1.C.2.e. Bank stabilization and sediment and pollution control. By providing a 24' buffer between the parking lot and the top of the ditch, this project should not affect bank stabilization. In my opinion the bank is too steep and the current vegetation is not ideal for

preventing sediment from the bank from entering the stream. However, it is ODOT property and they will not allow us to improve this situation.

As precipitation falling on the parking lot will flow away from the stream and into a bioswale and detention pond, sediment and pollution should not enter the WQR.

It should be noted that there is no gutter or storm water system to prevent runoff from H-224 from directly entering the WQR, but this is outside our control.

19.402.1.C.2.f. Large wood recruitment and retention and natural channel dynamics. The removal of trees for the parking lot will not have an impact on natural channel dynamics. The channel is not natural, and this project does not impact it in any event. With ODOT's permission the permittee could donate the removed trees and place them in the stream and bank. The area has little LWD due to the relatively young age of the alder stand on the stream banks, and the removed trees could be used to provide LWD and some structural diversity to this very degraded WQR.

19.402.1.C.2.g. Organic material resources.
Numerous studies have shown the importance of leaf litter as a major contributor to the organic inputs in small streams. The trees close to the stream contribute a proportionately greater amount of debris than those further away, and deciduous trees contribute more than coniferous trees. This project will not impact the trees along the stream bank, and will replace the vegetation between the ODOT property line and the parking lot with a mix of native trees and shrubs. Oak and ash trees, and a mix of native shrubs will increase the diversity of plants, and help improve what little habitat there is in this areas.

19.402.12.A.2 An inventory of vegetation, sufficient to categorize the existing condition of the WQR per Table 19.402.11.C, including the percentage of ground and canopy coverage materials within the WQR.

For the WQR and HCA area impacted by the proposed parking lot, the vegetation consists of a medium aged stand of mostly native deciduous trees and a grass understory. The grass is probably planted with some common mix of lawn grasses and is now mixed with a variety of common herbaceous weeds. There are no shrubs, probably owing to periodic mowing of the grass layer. The Himalayan Blackberries along the ODOT property line show signs of herbicide damage – evidently some periodic weed control is practiced in this area.

Several of the trees have large *Clematis sp*. vines, which have a "C" rank on Portland's invasive species list. Rank "C" is defined as "These species are known to be invasive. These species are widely distributed and abundant throughout the region. Their distribution is already very extensive throughout the natural areas and they are difficult to control once they become widespread. These plants are considered ubiquitous." Their eradication is not recommended unless a revegetation and maintenance plan will replace them with a native community.

Within the WQR and HCR, the herbaceous (grass) layer is about 100% cover, and the tree layer is about 70% cover, and there is no shrub layer. According to Table 19.402.11.C, the area rates a "Class B, Marginal" condition.

MITIGATION

General Standards for Required Mitigation. According to Section 19.402.11.B, permanent impacts to WQRs are to be mitigated according to subsection 19.402.11.C, and permanent impacts to HCAs are mitigated according to 19.402.11.D.2.

Disturbed areas. The disturbed areas are shown in Figure 3, and in Table 1 on page 8. The total disturbance to WQR and HCA areas is 15,240 sqft, of which 13,747 is permanent, and 1,493 sqft is temporary and will be replanted as part of the mitigation[1].

19.402.11.C Mitigation for WQR Areas. The WQR according to table 19.402.11.C is a Class "B – marginal" area. The restoration required is:

- Restore and mitigate disturbed areas with native species from the Milwaukie Native Plant List, using a City-approved plan developed to represent the vegetative composition that would naturally occur on the site.
- Inventory and remove debris and noxious materials.

19.402.11.D.2 Mitigation for HCA Areas. The mitigation standards for impacts to HCA areas is to replant with native vegetation, the quantity of which is defined by either the tree replacement table 19.402.11.D.2.a, or by 19.402.11.D.2.b, an area calculation, with which ever yields the larger number of required plants is the calculation to be used:

Table 2. Inventory of trees impacted by parking lot alternative "A".

IMPACTED TREES	Diameter individual trees at Breast Height (inches)														total
Cotton Wood	8	8	8	8	8	10	15	24	28	30	30	30	30	36	14
Alder	**6**	6	7	7	7	7	15								7
Maple	**4**	**4**	**7**	**10**	**14**	**24**									6
Western Red Cedar	24														1
Total number of trees removed															21 to 28

Note: Approximately 7 trees (shown bolded in the above table) are close to but outside the permanent impact area. A decision to remove or keep these trees will be made at the time of construction, taking into account the damage to the root zone and aesthetics. For the purposes of permitting these trees are counted as removed.

[1] Chapter 19.402 does not give specifics as to how permanent disturbances are to be mitigated, other than to replant the affected areas, which is not feasible as the affected area will be a paved parking lot. We propose instead to replant adjacent HCA and WQR areas which are currently degraded. The area to be replanted is not defined, and so we propose to the entire remaining vegetated areas on the south side of International Way, which is about 17,635 sqft which is slightly more than the permanent disturbance area, and slightly less than the total disturbance area. Temporary impacts will be mitigated by replanting as per 19.402.11.

Table 3. Replacement Trees and Shrubs per Table 19.402.11.D.2.a				
Size of trees removed	Count	Replacement	Trees	Shrubs
Trees less than 6" DBH	2	0 trees and 0 shrubs	0	0
Trees 6 to 12 DBH	14	2 trees and 3 shrubs	28	42
Trees 13 to 18 DBH	3	3 trees and 6 shrubs	9	18
Trees 19 to 24 DBH	3	5 trees and 12 shrubs	15	36
Trees 25 to 30 DBH	5	7 trees and 18 shrubs	25	90
Trees over 30 DBH	1	10 trees and 30 shrubs	10	30
Total removed	28	Total Replacements	87	216
DBH = Diameter at Breast Height				

Table 4. Mitigation Option 2 per 19.402.11.D.2.b. Tree and Shrub Replacement Based on the area of disturbance within the HCA (excluding already paved areas). Mitigation requires the planting of 5 trees and 25 shrubs per 500 SQFT of disturbance.		
Disturbed Area	Replacement Trees	Replacement shrubs
15,240 SQFT	152	762
80% SURVIVAL ROUNDED UP	122	610

The area calculation, (Option 2), gives a much larger number, and so is the one that will be used. The remaining undeveloped portions of lot 300 on the south side of SE International Way and available as a mitigation site total approximately 17,635 SQFT.

Mitigation standards are detailed in sections 19.402.11.B.2 through 19.402.11.B.10:

> 2. Required Plants. Unless specified elsewhere in Section 19.402, all trees, shrubs, and ground cover planted as mitigation shall be native plants, as identified on the Milwaukie Native Plant List. Applicants are encouraged to choose particular native species that are appropriately suited for the specific conditions of the planting site; e.g., shade, soil type, moisture, topography, etc.

The Portland Plant List shows a plant community called “2.2 Mixed Coniferous/Deciduous Riparian Forest”. This plant community is approximately similar to the one on site, and plants will be selected from this list for the most part.

> 3. Plant Size. Replacement trees shall average at least a ½-in caliper—measured at 6 in above the ground level for field-grown trees or above the soil line for container-grown trees—unless they are oak or madrone, which may be 1-gallon size. Shrubs shall be at least 1-gallon size and 12 in high.
>
> 4. Plant Spacing. Trees shall be planted between 8 and 12 ft on center. Shrubs shall be planted between 4 and 5 ft on center or clustered in single-species groups of no more than 4 plants, with each

cluster planted between 8 and 10 ft on center. When planting near existing trees, the dripline of the existing tree shall be the starting point for plant spacing measurements.

5. Plant Diversity. Shrubs shall consist of at least 2 different species. If 10 trees or more are planted, then no more than 50% of the trees shall be of the same genus.

6. Location of Mitigation Area

a. On-Site Mitigation. All mitigation vegetation shall be planted on the applicant's site within the designated natural resource that is disturbed, or in an area contiguous to the resource area; however, if the vegetation is planted outside of the resource area, the applicant shall preserve the contiguous planting area by executing a deed restriction such as a restrictive covenant.

b. Off-Site Mitigation

(1) For disturbances allowed within WQRs, off-site mitigation shall not be used to meet the mitigation requirements of Section 19.402.

(2) For disturbances allowed within HCAs, off-site mitigation vegetation may be planted within an area contiguous to the subject-property HCA, provided there is documentation that the applicant possesses legal authority to conduct and maintain the mitigation, such as having a sufficient ownership interest in the mitigation site. If the off-site mitigation is not within an HCA, the applicant shall document that the mitigation site will be protected after the monitoring period expires, such as through the use of a restrictive covenant.

7. Invasive Vegetation. Invasive nonnative or noxious vegetation shall be removed within the mitigation area prior to planting, including, but not limited to, species identified as nuisance plants on the Milwaukie Native Plant List. **NOTE: Section 19.402.5.E prohibits the use of herbicides with chemicals found on Milwaukie's Prohibited Chemicals List**

8. Ground Cover. Bare or open soil areas remaining after the required tree and shrub plantings shall be planted or seeded to 100% surface coverage with grasses or other ground cover species identified as native on the Milwaukie Native Plant List. Revegetation shall occur during the next planting season following the site disturbance.

9. Tree and Shrub Survival. A minimum of 80% of the trees and shrubs planted shall remain alive on the second anniversary of the date that the mitigation planting is completed.

a. Required Practices

To enhance survival of the mitigation plantings, the following practices are required:

(1) Mulch new plantings to a minimum of 3-in depth and 18-in diameter to retain moisture and discourage weed growth.

(2) Remove or control nonnative or noxious vegetation throughout the maintenance period.

b. Recommended Practices. To enhance survival of tree replacement and vegetation plantings, the following practices are recommended:

(1) Plant bare root trees between December 1 and April 15; plant potted plants between October 15 and April 30.

(2) Use plant sleeves or fencing to protect trees and shrubs against wildlife browsing and the resulting damage to plants.

(3) Water new plantings at a rate of 1 in per week between June 15 and October 15 for the first 2 years following planting.

c. Monitoring and Reporting. Monitoring of the mitigation site is the ongoing responsibility of the property owner. Plants that die shall be replaced in kind as needed to ensure the minimum 80% survival rate. The Planning Director may require a maintenance bond to cover the continued health and survival of all plantings. A maintenance bond shall not be required for land use applications related to owner-occupied single-family residential projects. An annual report on the survival rate of all plantings shall be submitted for 2 years.

10. Light Impacts. Where practicable, lights shall be placed so that they do not shine directly into any WQR and/or HCA location. The type, size, and intensity of lighting shall be selected so that impacts to habitat functions are minimized.

Recommendations for Planting.

The area available for mitigation planting is shown on Figure 5. A generalized planting plan is shown in Figure 4.

The planting area has two distinct environments, the flatter areas above the ditch, and the steep slope dropping down to the ordinary high water line of the ditch.

The Flat Areas: The areas adjacent to the parking lot consists of a relatively narrow flat area on top, that will have up to seven remaining alder and maple trees after construction of the parking lot is completed. A decision will be made as to which (if any) of these seven trees will be kept based on damage to the root zone during construction and the trees compatibility with the parking area. Please see Table 2 for a list including these seven trees.

There is room for only a single row of large trees along the top of the ditch and perimeter of the parking lot. This strip is about 542'[2] long, and if planted with on 10' center will take 54 trees. Milwaukie code required a spacing of 8 to 12 feet for trees. The trees will be planted alternating Oak Trees with Western Hemlock.

Short flowering shrubs will be planted in the upper flat area between the top of the ditch and the edge of the parking lot. Taller shrubs and trees will be planted on the slope.

3 inches of mulch will be applied to the flat areas after plants have been installed to help control weeds and to help retain moisture while the trees and shrubs are establishing. No seed mix will be used in the flat areas as one of our intents is to create a somewhat landscaped appearance for the perimeter of the parking area. With the number of shrubs we are using we expect that a quick establishment of shrubs will soon crowd out other vegetation anyway.

The Sloped Area: The slope dropping down to the ditch is very steep, the topo maps show it at about an 87% slope. The slope currently has a canopy of alder trees with a dense thicket of blackberry other invasives underneath.

Once the blackberries are removed, the slope needs to be protected with a coir fiber mat to prevent erosion, then planted. The planting should include a large amount of plants that will help stabilize to soil, such as snowberry and aspen, as these plants form dense roots systems. The slope area will be seeded with a combination of two seed mixes, and this is designed to provide a quick establishment of grasses for erosion control, plus seeds of riparian shrubs (snowberry in particular) which will form a dense root growth for erosion control. Spec sheets for the two mixes can be found at the links below:

http://www.sunmarkseeds.com/spec_sheets/streambank.pdf
http://www.sunmarkseeds.com/spec_sheets/Riverside%20Woods.pdf

ETC recommends hydroseeding with a product called "PermaMatrix" in order to achieve a rapid plant establishment.

[2] The southern side of the existing parking lot – about 400' long – already is planted with a row of tall coniferous trees, there is no room available for more trees in this section, though there will be some room for shrubbery once the Blackberries are removed.

Shrubs and trees will be planted as shown in Figure 4. The alder canopy trees will remain, and our plantings will be integrated with these existing trees.

Timeline for Mitigation Installation.

Plantings for trees and shrubs should be done during the winter months, from November through February, with the earlier the better. This is to give the trees and shrubs as much time as possible to acclimate and develop a root system while the above ground portions of the plant are more or less dormant. In practice we have experienced problems obtaining plants from the nurseries in November and December, and so anticipate planting in January. If the wet springs we have experienced in the last couple years continue, we expect that a winter planting will be successful with no supplemental water provided.

Ideally we will have at least 4 months during the growing season for weed control and site preparation before planting. Blackberries are difficult to control, and it is very desirable to have time for blackberries to resprout and grow after the first round of herbicide and manual removal, so that any plants remaining after the initial effort can be eradicated by a follow-up effort. ETC will not guarantee results without given this condition.

Table 5. Proposed timeline for mitigation. The following time table is proposed based on the assumption that we will be required to start in September and replant during this first winter[3].

Month	Activity
September 1, 2012	Identification and flagging of shrubs and small trees we wish to preserve.
September 2, 2012	1st application of herbicide, selective spraying only to invasives.
September 15	Manual removal of vines, 2nd spraying of remaining live vines.
October 1	2nd spraying of any surviving vines, continued manual removal
October 15	Clearing of site and installation of coir fiber mats on sloped areas
	Planting of seed mixes to sloped areas.
January 2013	Installation of trees and shrubs.
April	Quick site visit to inspect plantings. Seed mixes should be spouted and growing and trees and shrubs should be putting out new leaves.
May	Spot herbicide applications to control of invasive plants.
July (early)	Detailed inspection, a tally of survival by plant species will be made. Plants that are not going to survive should be identifiable by now. Frequently mitigations will experience a high failure rate in one or two species, this is what we will look for and a decide if the problem is great enough to require replacements.
August	1st annual mitigation monitoring report.
	Spot herbicide applications to control invasive plants
August	Spot herbicide applications to control invasive plants
January 2014	Installation of replacement trees and shrubs if needed
May	Spot herbicide application to control invasive plants
July	Spot herbicide application to control invasive plants
August 2014	2nd and Final annual inspection and mitigation monitoring report.

[3] **ETC recommends that with a September start date, that for the sloped areas only weed control and site preparation be performed through the growing season of 2013, with planning to follow in January 2014. Flat areas can be planted in January 2013 however.**

Table 6. Planting Recommendations. 152 Trees and 762 Shrubs are required per 19.402.11.D.2.b. Substitutions may be allowed depending on species availability from nurseries at the time of planting.

Trees	Flat Areas	Steep Slope	Stream Bank
Scouler Willow, *Salix scouleriana*			50
Quaking Aspen, *Populus tremuloides*		15	
Garry Oak, *Quercus garryana*	27		
Bitter Cherry, *Prunus emarginata*		10	
Western Red Cedar, *Thuja plicata*		8	
Grand Fir, *Abies grandis*		6	
Douglas Fir, *Pseutdotsuga menziesii*		10	
Western Hemlock, *Tsuga heterophylla*	27		
SUB TOTAL TREES	54	49	50
GRAND TOTAL TREES	152		
Shrubs	Flat Areas	Steep Slope	Stream Bank
Shrubs for Planting on Steep Slope Adjacent to WRQ			
Hazelnut, *Corylus cornuta*		63	
Ocean-spray, *Holodiscus discolor*		50	
Osoberry, *Oemleria cerasiformis*		50	
Pacific Ninebark, *Physocarpus capitatus*			50
Common Snowberry, *Symphoricarpos albus*		100	
Black Twinberry, *Lonicera hispidula*			50
Red Osier Dogwood, *Cornus sericea*			50
Douglas Spirea, *Spiraea douglasii*		50	
Oval-leaved Viburnum, *Viburnum ellipticum*		50	
Flowering Shrubs for Ornamental Arrangements Between Slope and Parking lot.			
Dull Oregon Grape, *Berberis nervosa*	50		
Salal, *Gaultheria shallon*	50		
Red Currant, *Ribes sanguineum*	50		
Tall Oregon Grape, *berberis aquifolium*	50		
Mockorange, *Philadelpus lewisii*	50		
SUBTOTAL SHRUBS	250	363	150
GRAND TOTAL SHRUBS	762		

APPENDIX A) FIGURES

Figure 1 – Proposed Impact and Alternatives

Figure 2 – Milwaukie Natural Resources Overlay Map.

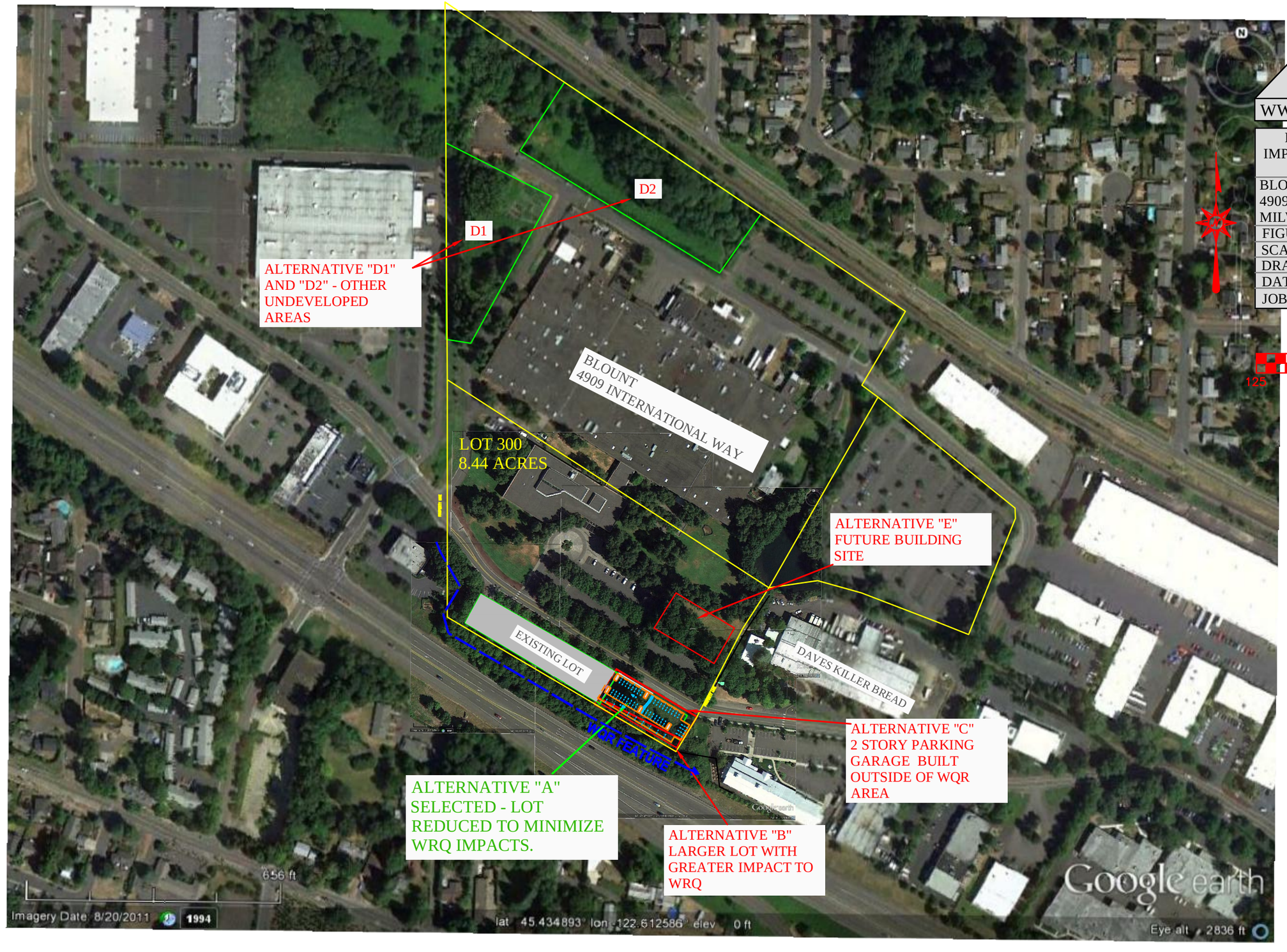
Figure 3A – Temporary and Permanent Impact Areas

Figure 3B – Temporary and Permanent Impact Areas

Figure 4 – Typical Mitigation Planting.

Figure 5 – Mitigation Planting Areas.

Figure 6 – Page from the Blount Master Plan.



environmental technology consultants

WWW.etcEnvironmental.NET

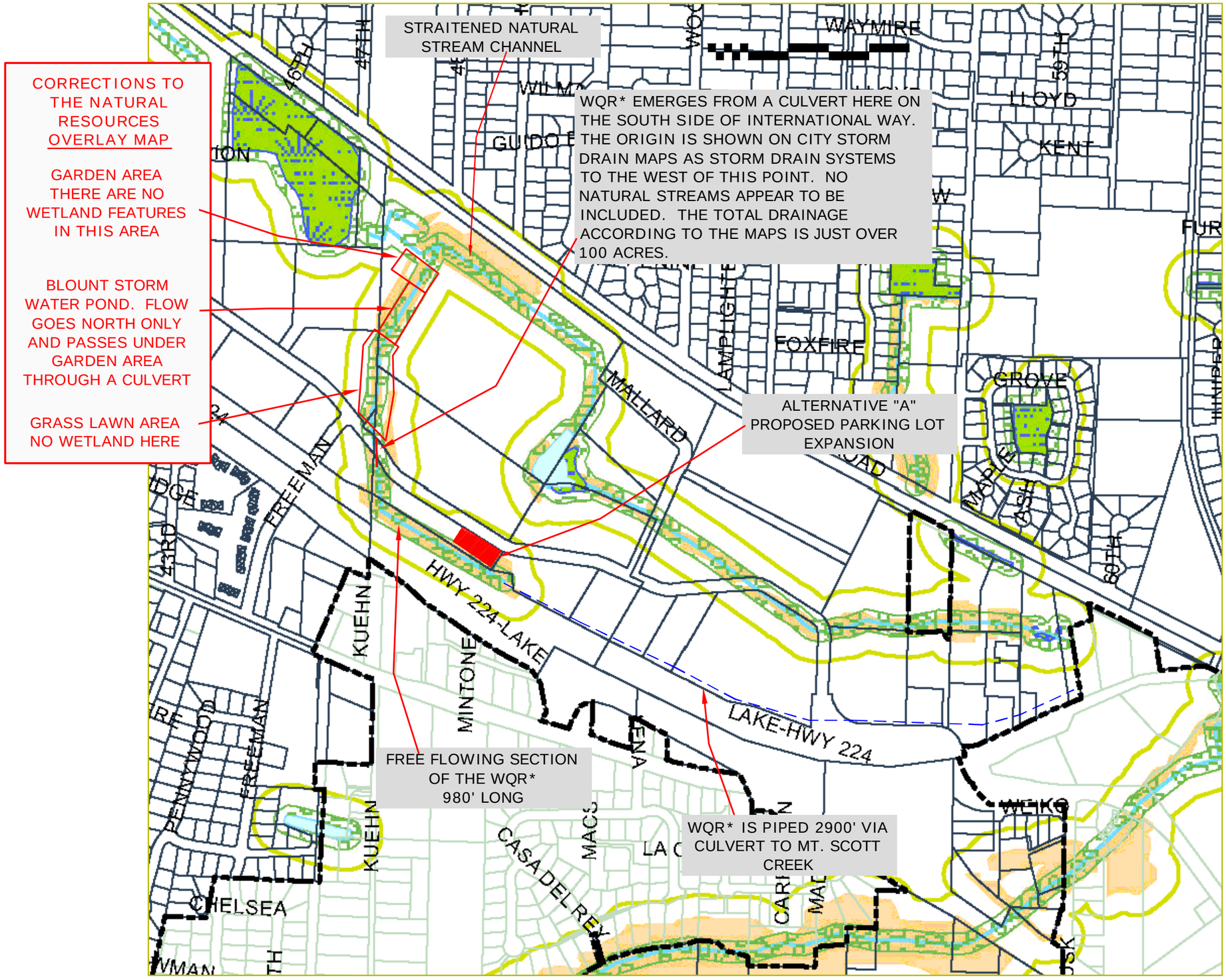
BLOUNT PARKING LOT IMPACT AND ALTERNATIVES ANALYSIS	
BLOUNT INTERNATIONAL, INC 4909 SE INTERNATIONAL WAY MILWAUKIE, OR 97222-2127	
FIGURE	1
SCALE	1" = 250'
DRAWN BY	J. McConnaughey
DATE	JULY 2012
JOB #	EVA 12-004

GRAPHICAL SCALE

125 0 125 250 375 500

FORMATTED FOR 11x17 PAPER

SCALE IS RATHER APPROXIMATE



environmental technology consultants

WWW.etcEnvironmental.NET

LOCATION OF THE WQR ON THE NATURAL RESOURCES OVERLAY MAP	
BLOUNT INTERNATIONAL, INC 4909 SE INTERNATIONAL WAY MILWAUKIE, OR 97222-2127	
FIGURE	2
SCALE	1" = 500'
DRAWN BY	J. McConnaughey
DATE	APRIL 2012
JOB #	EVA 12-004

GRAPHICAL SCALE

250 0 250 500 750 1000

EXCERPT FROM THE CITY OF MILWAUKIE NATURAL RESOURCES OVERLAY MAP

*WQR. THE WATER QUALITY RESOURCE AFFECTED BY THE PROPOSED PARKING LOT EXPANSION IS AN ARTIFICIAL DRAINAGE WAY, (DITCH), THOUGHT TO HAVE BEEN BUILT WITH THE CONSTRUCTION OF HIGHWAY 224.

IT MEETS THE CRITERIA FOR BEING CONSIDERED A NON-JURISDICTIONAL ROADSIDE DITCH UNDER OAR 141-085-0515. BECAUSE THE PROJECT DOES NOT PROPOSE ANY ACTUAL WETLAND IMPACTS, ODSL HAS NOT BEEN CONSULTED ON THIS POINT. IF WETLAND IMPACTS WERE PROPOSED THEN ODSL WOULD BE CONSULTED FOR JURISDICTIONAL STATUS.

environmental technology consultants

WWW.etcEnvironmental.NET

TEMPORARY AND PERMANENT IMPACTS TO WQR AND HCA AREAS	
BLOUNT INTERNATIONAL, INC 4909 SE INTERNATIONAL WAY MILWAUKIE, OR 97222-2127	
FIGURE	3A
SCALE	1" = 30'
DRAWN BY	J. McConnaughey
DATE	JULY 2012
JOB #	EVA 12-004

GRAPHICAL SCALE

15 0 15 30 45 60

FORMATTED FOR 11x17 PAPER

P3

P4

P2

P1

LIMIT OF HCA

PROPERTY LINE

HCA PERMANENT DISTURBANCE AREA 8,085 SQFT

WQR PERMANENT DISTURBANCE AREA 5,662 SQFT

WQR TEMPORARY DISTURBANCE 1,320 SQFT (5' CONSTRUCTION BUFFER

HCA TEMPORARY DISTURBANCE 173 SQFT, (5' CONSTRUCTION BUFFER)

HCA LINE (DETERMINED BY CITY)

WRQ (50' FROM SLOPE BREAK PER 19.402.15)

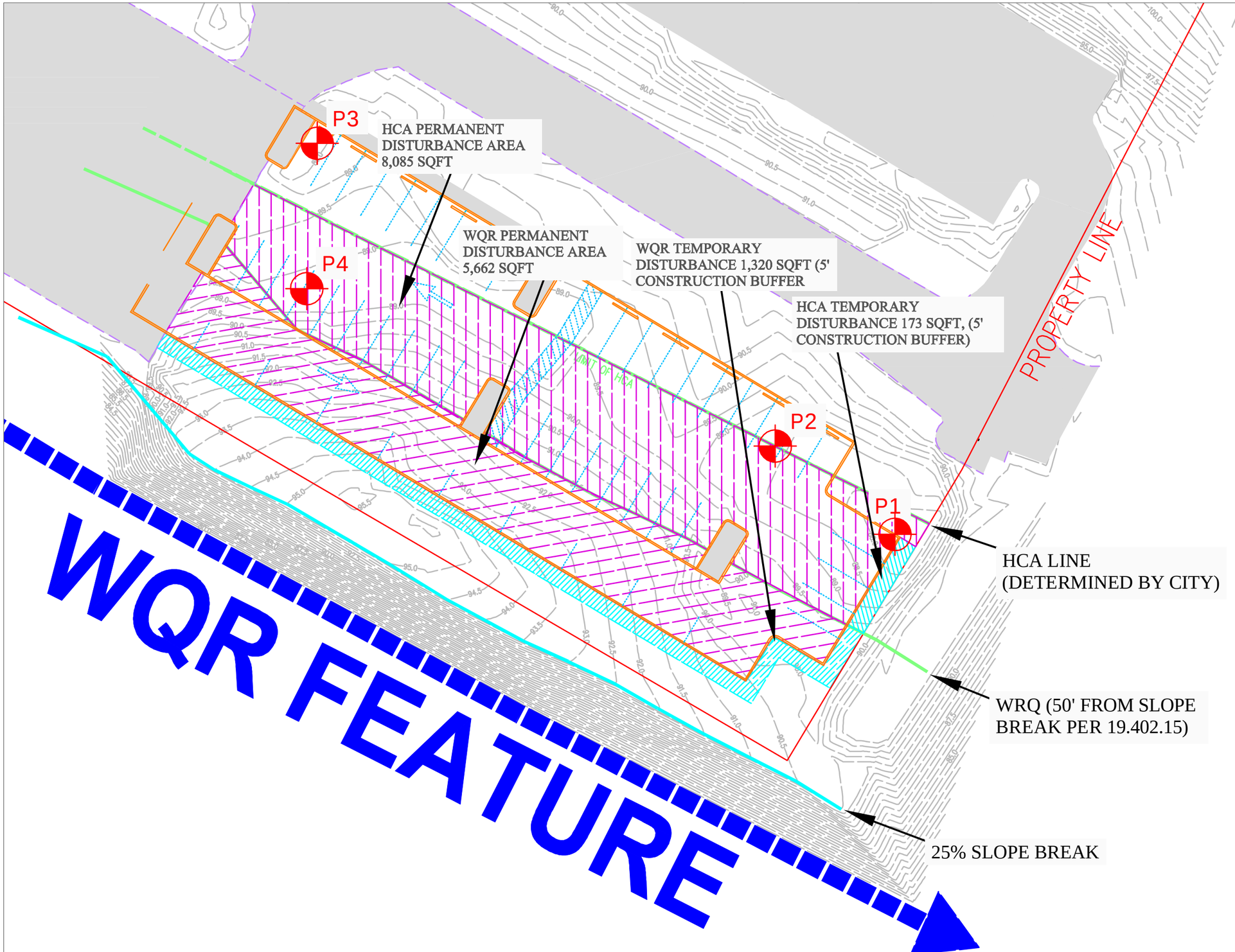
25% SLOPE BREAK

WQR FEATURE

PROPOSED PARKING LOT EXPANSION SHOWN ON GOOGLE MAP BACKGROUND.

TOTAL DISTURBANCE TO HCA AND WQR AREAS = 15,240 SQFT

P1



environmental technology consultants

WWW.etcEnvironmental.NET

TEMPORARY AND PERMANENT IMPACTS TO WQR AND HCA AREAS	
BLOUNT INTERNATIONAL, INC 4909 SE INTERNATIONAL WAY MILWAUKIE, OR 97222-2127	
FIGURE	3B
SCALE	1" = 30'
DRAWN BY	J. McConnaughey
DATE	JULY 2012
JOB #	EVA 12-004

GRAPHICAL SCALE

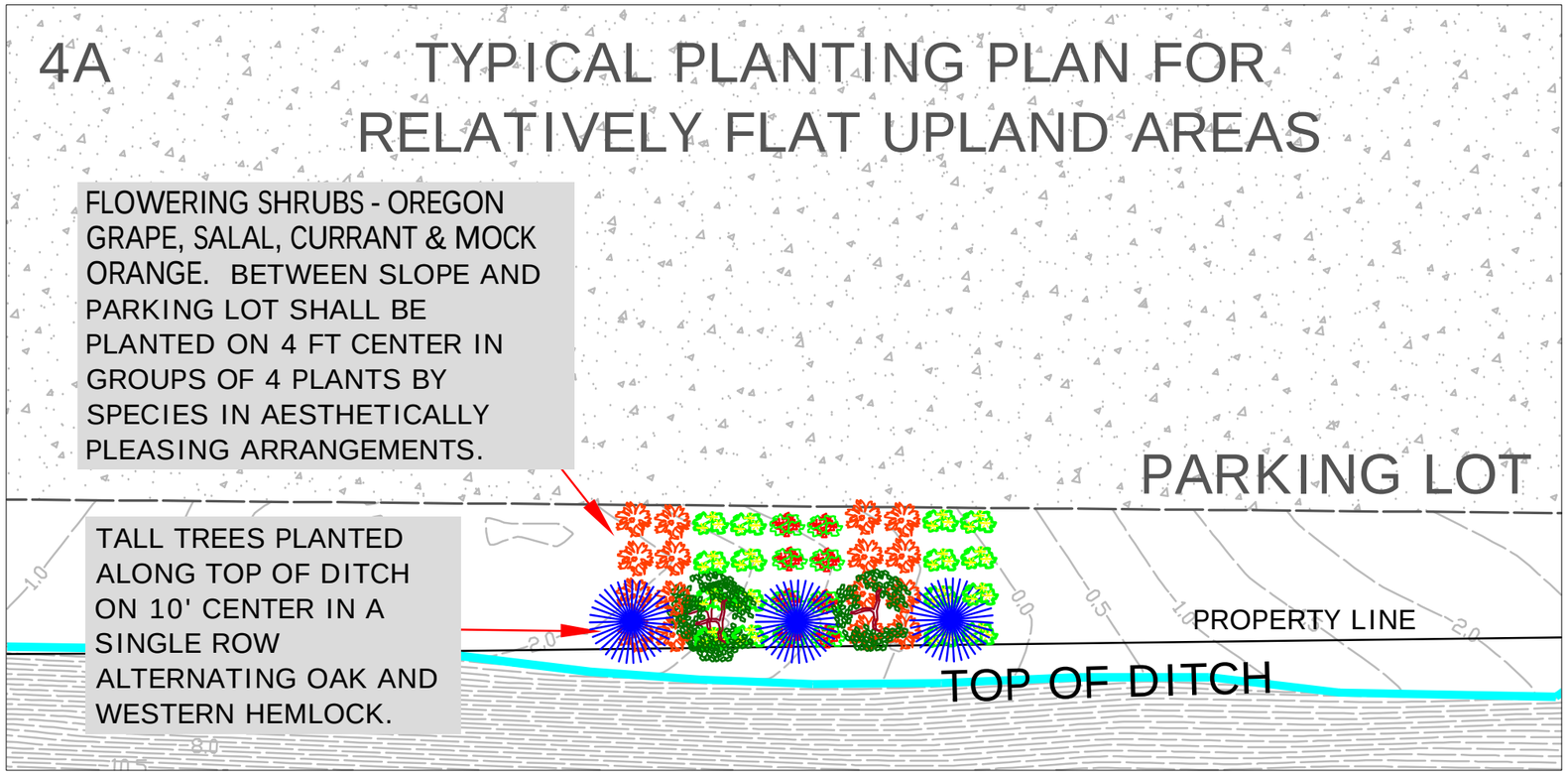
15 0 15 30 45 60

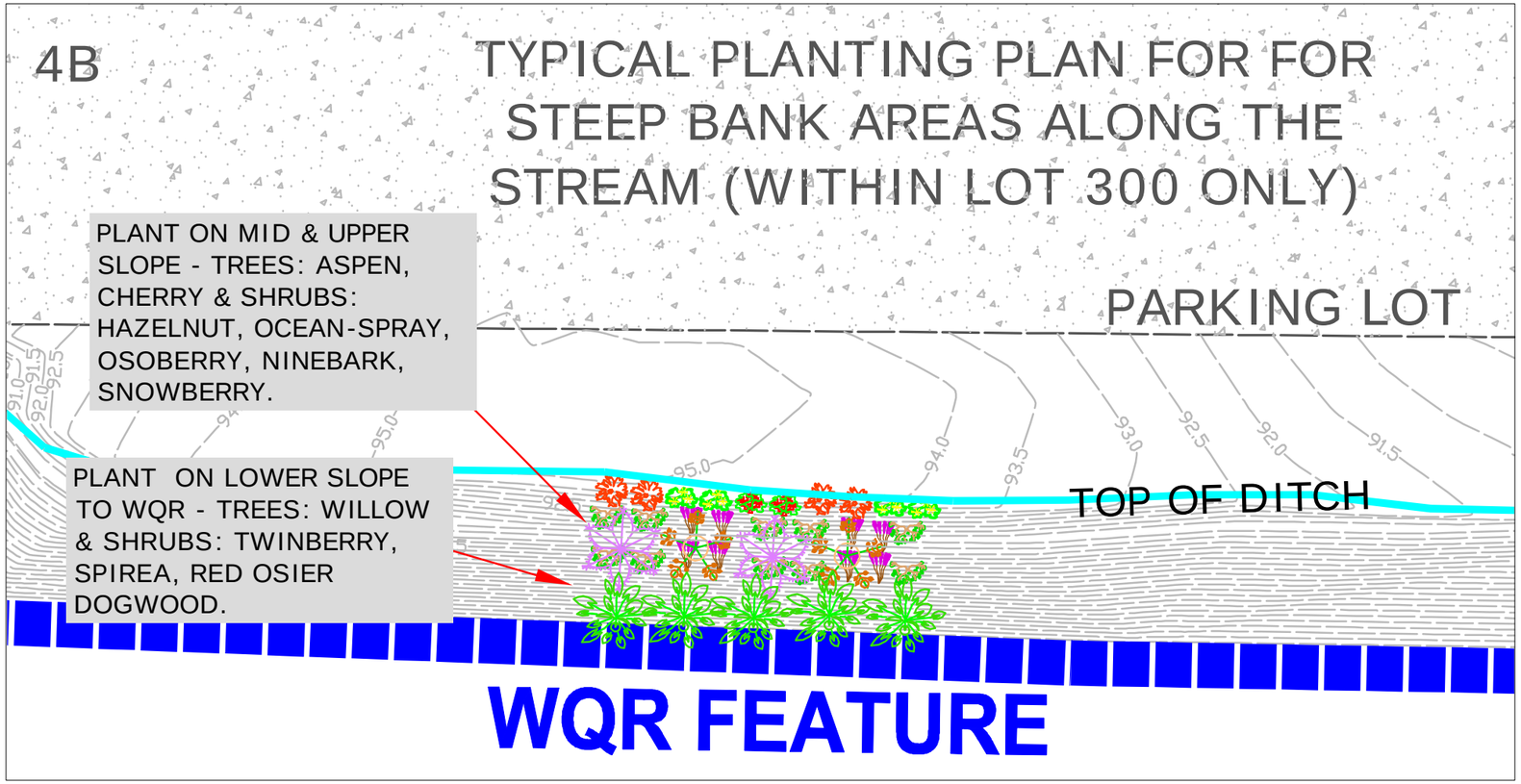
FORMATTED FOR 11x17 PAPER

PROPOSED PARKING LOT EXPANSION SHOWN ON TOPO MAP BACKGROUND.

TOTAL DISTURBANCE TO HCA AND WQR AREAS = 15,240 SQFT

P1 WETLAND DELINEATION DATA PLOT





environmental technology consultants

WWW.etcEnvironmental.NET

MITIGATION PLANTING PLAN FOR HCA AND WQR AREAS.	
BLOUNT INTERNATIONAL, INC 4909 SE INTERNATIONAL WAY MILWAUKIE, OR 97222-2127	
FIGURE	4A & 4B
SCALE	1" = 25' APPROX
DRAWN BY	J. McConnaughey
DATE	APRIL 2012
JOB #	EVA 12-004

TYPICAL MITIGATION PLANTING FOR BLOUNT PARKING LOT.

THIS DRAWING SHOWS THE TYPICAL PLANTING ARRANGEMENTS. SEE FIGURE 5 FOR THE AREAS TO BE PLANTED.

INVASIVE AND NON NATIVE PLANTS WILL BE REMOVED FROM ALL PLANTING AREAS PRIOR TO PLANTING.

THE TOP OF DITCH AND FLAT AREAS WILL BE PLANTED IN ORNAMENTAL ARRANGEMENTS. A SINGLE ROW OF TALL TREES WILL BE PLANTED ALONG THE TOP OF THE DITCH, OR ALONG THE PROPERTY LINE IN AREAS WHERE BLOUNT DOES NOT OWN THE TOP OF THE DITCH. AN ORNAMENTAL ARRANGEMENT OF SHORT AND FLOWERING NATIVE SHRUBS WILL BE PLANTED BETWEEN THE TOP OF THE DITCH AND THE PARKING LOT. 3" OF BARK MULCH WILL BE USED IN THE PLANTING AREAS.

AREAS ON THE DITCH SLOPE THAT ARE WITHIN LOT 300 WILL BE PLANTED OPPORTUNISTICALLY AROUND EXISTING VEGETATION. CURRENTLY THESE AREAS ARE COVERED WITH BLACKBERRIES WHICH WILL BE REMOVED. SLOPE AREAS WILL BE COVERED WITH WOVEN COIR FIBER MAT FOR EROSION CONTROL BEFORE PLANTING.

MITIGATION REQUIRES THE PLANTING OF 152 TREES OF AT LEAST 1/2-IN CALIPER, (OR 1 GALLON IF OAK), AND THE PLANTING OF 762 SHRUBS OF AT LEAST 1 GALLON AND 12 IN HIGH.

A LIST OF RECOMMENDED PLANTS AND THEIR NUMBERS IS SHOWN IN TABLE 5.

MITIGATION SUCCESS CRITERIA. 19.402.11.B.9, "A minimum of 80% of the trees and shrubs planted shall remain alive on the second anniversary of the date that the mitigation planting is complete." THIS MITIGATION WILL BE CONSIDERED SATISFYING THIS STANDARD SHOULD 122 TREES AND 610 SHRUBS SURVIVE TWO YEARS AFTER PLANTING. To help ensure the success of the mitigation, the permittee may plant an excess of plants, but will only be responsible for a minimum survival of 122 trees and 610 shrubs.

LOT 300
8.44 ACRES

PROPERTY LINE

MITIGATION PLANTING AREA

APPROXIMATELY 17,635 SQFT. INCLUDES ALL REMAINING UNDEVELOPED HCA AND WQR AREAS ON LOT 300 SOUTH OF INTERNATIONAL WAY. DOES NOT INCLUDE ANY THE DITCH BELOW THE HIGH WATER LINE, OR ANY ROAD OR HIGHWAY RIGHT OF WAY AREAS. NOR DOES IT INCLUDE ANY PROPERTIES NOT BELONGING TO BLOUNT.

environmental technology consultants

WWW.etcEnvironmental.NET

BLOUNT PARKING LOT MITIGATION PLANTING AREAS	
BLOUNT INTERNATIONAL, INC 4909 SE INTERNATIONAL WAY MILWAUKIE, OR 97222-2127	
FIGURE	5
SCALE	1" = 100'
DRAWN BY	J. McConnaughey
DATE	JULY 2012
JOB #	EVA 12-004

GRAPHICAL SCALE

50 0 50 100 150 200

FORMATTED FOR 11x17 PAPER

PROPOSED PARKING LOT

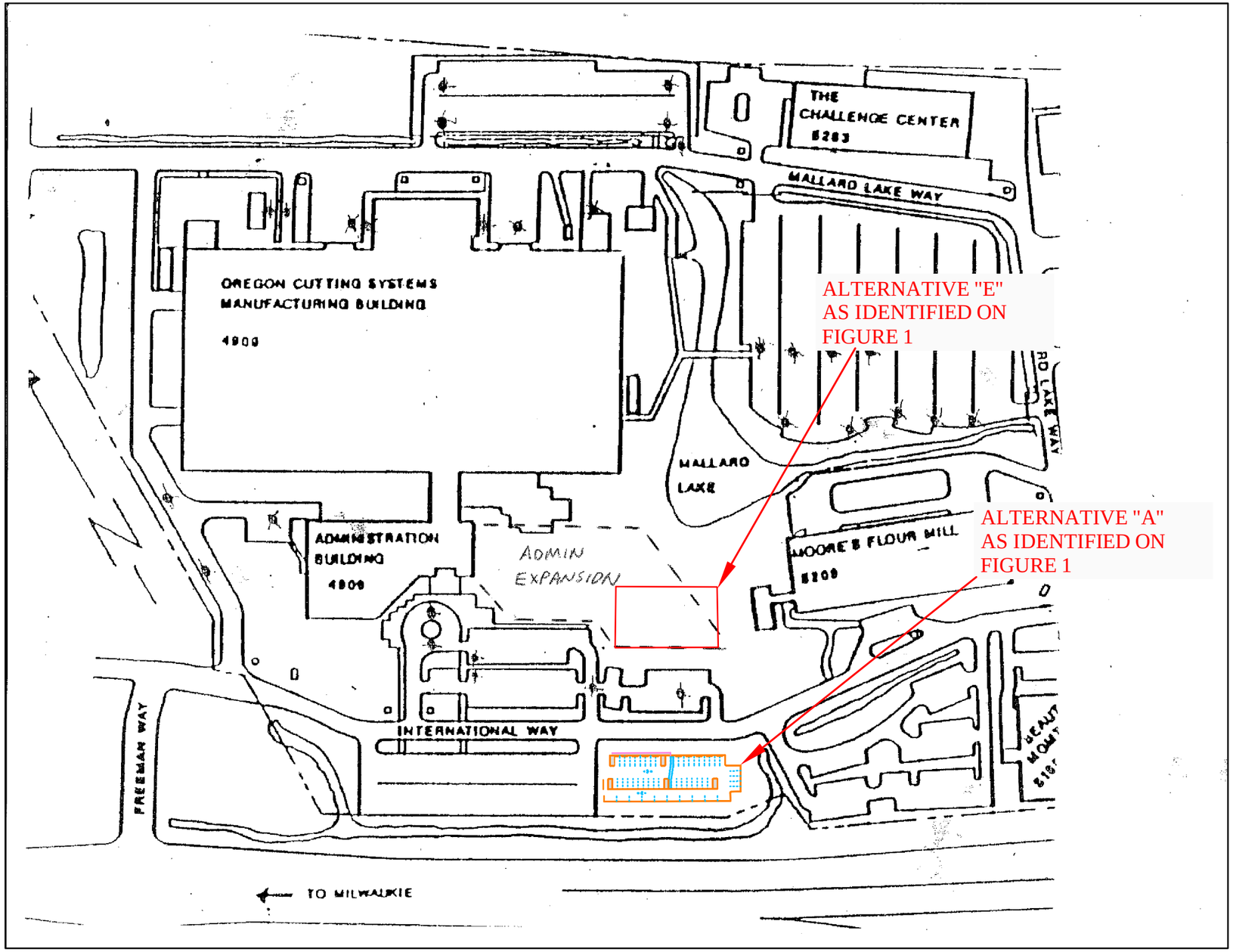
TOTAL PROJECT AREA IS ABOUT 18,787 SQFT, AND CAUSESAPPROXIMATELY 13,747 SQFT OF PERMANENT, AND 1,493 SQFT OF TEMPORARY DISTURBANCE TO HCA AND WQR AREAS. WE PROPOSE TO MITIGATE THIS DISTURBANCE BY VEGETATION PLANTINGS AND MAINTENANCE TO APPROXIMATELY 17,635 SQFT OF HCA AND WQR AREAS, INCLUDING THE 1,493 SQFT OF TEMPORARY DISTURBANCE. THE MITIGATION WILL INCLUDE THE PLANTING OF 152 TREES AND 762 SHRUBS, PLUS EXTENSIVE REMOVAL AND CONTROL OF INVASIVE PLANT SPECIES.

STEEP DITCH SLOPE AREA

AREA OF STEEP SLOPES OF DITCH BANK THAT WILL BE PLANTED ACCORDING TO FIGURE 4B. THE FLATTER AREAS ABOVE THE DITCH WILL BE PLANTED ACCORDING TO 4A.

WQR FEATURE

PROPERTY LINE



environmental technology consultants

WWW.etcEnvironmental.NET

PAGE FROM THE BLOUNT MASTER PLAN.	
BLOUNT INTERNATIONAL, INC 4909 SE INTERNATIONAL WAY MILWAUKIE, OR 97222-2127	
FIGURE	6
SCALE	1" = 200' APPROX
DRAWN BY	J. McConnaughey
DATE	JULY 2012
JOB #	EVA 12-004

GRAPHICAL SCALE

100 0 100 200 300 400

PAGE FROM THE BLOUNT MASTER PLAN SHOWING THE EXPANSION OF THE ADMINISTRATION BUILDING IN RELATION TO THE PROPOSED PARKING LOT.

APPENDIX B) Ground Level Color Photographs

Photo 1. Crowded street parking on International Way, without adequate walkways and striped parking stalls for pedestrian safely. Overflow from the four Blount parking lots compete with employees from neighboring businesses for these spaces. ETC Photo 3/27/2012.

Photo 2. Outfall of the culvert into Mt. Scott Creek. This culvert passes water about 2900' underground from the proposed parking area to Mr. Scott Creek. This system intercepts untreated surface water from I-224 at several points along it's path.

ETC Photo 04/09/2012

Photo 3. Typical profile of the creek in the free flowing section between the culvert at the Day Management Corporation (4700 SE International Way), and Bob's Red Mill Restaurant, (5000 SE International Way).

ETC Photo 03/27/2012

Photo 4. The stream emerges from culverts passing under the street at 4700 SE International Way, (the Day Management Corporation), flows 960' and enters this culvert at the Bob's Red Mill Restaurant, and from this point is piped 2900' to Mt. Scott Creek.

ETC Photo 3/20/2012

Photo 5. Large *Clematis sp*. (an invasive specie) growing on one of the larger Cotton wood trees.

ETC Photo 03/20/2012

Photo 6. Buffer area that will be re-planted as part of the mitigation. The Pink line is the approximate Southwest lot property line, and the yellow is the approximate extent of the proposed parking lot. The row of trees and blackberries on the left mark the top of the ditch the WQR is in.

ETC Photo 03/20/2012

Photo 7. A slight depression on the site that was tested for wetland conditions. Although plants were questionable, the soils and hydrology proved negative for wetland conditions. Stakes mark where wetland test pits were dug. This grassy vegetation typifies the herbaceous vegetation on the site. Street parking along International Way is on the right side of the photo, the existing parking lot this project will expand is in the back of photo.

ETC Photo 03/20/2012

Photo 8. A second slight depression on the toward the west end of the project area that was tested for wetland conditions by request from the City of Milwaukie. Plants and soils were judged to be disturbed, and evidence of wetland hydrology was lacking.

Photo 9. Culverts from storm water systems bring water to this point on International Way, which is the start of the free flowing section of this water resource. Please see Figure 2 for location. The ditch flows approximately 980' to where it enters another culvert, (see Photo 1).

APPENDIX C) WETLAND DATA FORMS

Standard wetland delineation data forms for four data plots. Plots 1 and 2 are presented on the same data form.

See Figure 3B for the locations of the data plots.

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project Site: **4909 SE International Way, SE corner of Lot 300** City/County: **Milwaukie** Sampling Date: **3/20/2012**

Applicant/Owner: **Blount International, Inc** State: OR Sampling Point: **P1 & P2**

Investigator(s): **John McConnaughey / www.etcEnvironmental.net** Section, Township, Range: **1S2E31CD Lot 300**

Landform (hillslope, terrace, etc.): **Bench** Local relief (concave, convex, none): **concave** Slope (%): **1-2%**

Subregion (LRR): **LRR-A** Lat: **N 45.370963** Long: **W 122.702464°** Datum: **1984**

Soil Map Unit Name: **Aloha Silt Loam** NWI classification: **Not a wetland**

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.) **About average**

Are Vegetation ☒, Soil ☒, Or Hydrology ☐, significantly disturbed? Are "Normal Circumstances" present? Yes ☐ No ☒

Are Vegetation ☐, Soil ☐, Or Hydrology ☐, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes	☒	No	☐	**Is sampled area in a wetland?** **Yes** ☐ **No** ☒
Hydric Soil Present?	Yes	☐	No	☒	
Wetland Hydrology Present?	Yes	☐	No	☒	

Remarks: **Two plots in a small depression in the NE corner of the proposed parking lot. The plots were so similar they are shown combined here on one data sheet. The vegetation is infrequently maintained by field mowing and herbicides. Data plots were selected to represent the lowest and wettest conditions that existed within the project area.**

VEGETATION – Use scientific names of plants

Tree Stratum (Plot Size: **30**)	Absolute % Cover	Dominant Species?	Indicator Status
1. **No Trees**	%		
2.	%		
3.	%		
4.	%		
	0%	= Total Cover	
Sapling/Shrub Stratum (Plot Size: **30**)			
1. **Rubus discolor (mowed)**	**2%**	**No**	**FACU**
2.	%		
3.	%		
4.	%		
5.	%		
	2%	= Total Cover	
Herb Stratum (Plot Size: **5**)			
1. **Festuca arundinacea**	**60%**	**Y**	**FAC**
2. **Cardamine oligosperma**	**5%**	**N**	**FAC**
3. **Cirsium arvense**	**10%**	**N**	**FACU**
4. **Poa pratensis**	**20%**	**Y**	**FAC**
5. **Ranunculus repens**	**1%**	**N**	**FAC**
6. **Juncus effusus**	**5%**	**N**	**FACW**
7. **Taraxacum officinale**	**5%**	**N**	**FACU**
8. **Urtica dioica**	**2%**	**N**	**FACW**
9. **Prunella vulgaris**	**1%**	**N**	**FACU**
10.	%		
11.	%		
	109%	= Total Cover	
Woody Vine Stratum (Plot Size: **30' circle**)			
1. **Hedera helix**	**0%**		**NOL**
2. **Clematis spp.**	**0%**		**FAC**
	0%	= Total Cover	

% Bare Ground in Herb Stratum **%**

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC:	**2**	(A)
Total Number of Dominant Species Across All Strata:	**2**	(B)
Percent of Dominant Species That Are OBL, FACW, or FAC:	**100%**	(A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species	x1 =
FACW species	x2 =
FAC species	x3 =
FACU species	x4 =
UPL species	x5 =
Column Totals: (A)	(B)

Prevalence Index = B/A =

Hydrophytic Vegetation Indicators:

- ☐ 1 - Rapid Test for Hydrophytic Vegetation
- ☒ 2 - Dominance Test is >50%
- ☐ 3 - Prevalence Index is ≤3.0[1]
- ☐ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
- ☐ 5 - Wetland Non-Vascular Plants[1]
- ☐ 6 - Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes** ☒ No ☐

Remarks: **Areas is infrequently mowed. Herbacious vegetation is very lush, brush and trees are probably removed by mowing and other control, particularly herbicide.**

SOIL

Project Site: **4909 SE International Way, SE** corner of Lot 300

Sampling Point: **P1** & P2

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (Moist)	Redox Features %	Redox Features Type[1]	Redox Features Loc[2]	Texture	Remarks
0 - 18	**10YR2/2**	**100%**		**%**	**None**		**Silt loam**	
		%		**%**				
		%		**%**				
		%		**%**				
		%		**%**				
		%		**%**				
		%		**%**				
		%		**%**				

[1]Type: C= Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1) **(except MLRA 1)**
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ☐ 2 cm Muck (A10)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type:

Depth (Inches):

Hydric Soils Present? **Yes** ☐ **No** ☒

Remarks: **Soil is likely fill. The area was likely leveled out and fill brought in. Higher areas of the site have a lot of clay soils on or near the surface, but these soils are likely spoils from the ditch dug along the south border of the property.**

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Surface Soil Cracks (B6)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Water-Stained Leaves (B9) **(except MLRA 1, 2, 4A, and 4B)**
- ☐ Salt Crust (B11)
- ☐ Aquatic Invertebrates (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Oxidized Rhizospheres along Living Roots (C3)
- ☐ Presence of Reduced Iron (C4)
- ☐ Recent Iron Reduction in Tilled Soils (C6)
- ☐ Stunted or Stresses Plants (D1) **(LRR A)**
- ☐ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ☐ Water-Stained Leaves (B9) **(MLRA 1, 2, 4A, and 4B)**
- ☐ Drainage Patterns (B10)
- ☐ Dry-Season Water Table (C2)
- ☐ Saturation Visible on Aerial Imagery (C9)
- ☐ Geomorphic Position (D2)
- ☐ Shallow Aquitard (D3)
- ☐ FAC-Neutral Test (D5)
- ☐ Raised Ant Mounds (D6) **(LRR A)**
- ☐ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present?	Yes	☐	No	☒	Depth (inches):
Water Table Present?	Yes	☐	No	☒	Depth (inches):
Saturation Present? (includes capillary fringe)	Yes	☐	No	☒	Depth (inches):

Wetland Hydrology Present? **Yes** ☐ **No** ☒

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: **With the recent heavy rains this area would have a water table if it were a wetland.**

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project Site: **4909 SE International Way, SE corner of Lot 300** City/County: **Milwaukie** Sampling Date: **6/12/2012**

Applicant/Owner: **Blount International, Inc** State: OR Sampling Point: **P3**

Investigator(s): **John McConnaughey / www.etcEnvironmental.net** Section, Township, Range: **1S2E31CD Lot 300**

Landform (hillslope, terrace, etc.): **Bench** Local relief (concave, convex, none): **concave** Slope (%): **1-2%**

Subregion (LRR): **LRR-A** Lat: **N 45.370963** Long: **W 122.702464º** Datum: **1984**

Soil Map Unit Name: **Aloha Silt Loam** NWI classification: **Not a wetland**

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.) **About average**

Are Vegetation ☒, Soil ☒, Or Hydrology ☐, significantly disturbed? Are "Normal Circumstances" present? Yes ☐ No ☒

Are Vegetation ☐, Soil ☐, Or Hydrology ☐, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes	☐	No	☒	
Hydric Soil Present?	Yes	☒	No	☐	**Is sampled area in a wetland?** **Yes** ☐ **No** ☒
Wetland Hydrology Present?	Yes	☐	No	☒	

Remarks: **Represents an area in the NW corner of the project area that the city requested a data plot in. There is an old tire stop and some gravel, this area may have been used for parking at one time. Leaves from the fall may have been piled here also, and since removed.**

VEGETATION – Use scientific names of plants

Tree Stratum (Plot Size: **30**)	Absolute % Cover	Dominant Species?	Indicator Status
1. **No Trees**	%		
2.	%		
3.	%		
4.	%		
	0%	= Total Cover	
Sapling/Shrub Stratum (Plot Size: **30**)			
1. **Rubus ursinus**	**5%**	**Y**	**FACU**
2. **Rubus discolor**	**5%**	**Y**	**FACU**
3.	%		
4.	%		
5.	%		
	10%	= Total Cover	
Herb Stratum (Plot Size: **15**)			
1. **Rumex crispus**	**1%%**	**N**	**FAC**
2. **Taraxacum officinale**	**5%**	**Y**	**FACU**
3. **Plantago lanceolata**	**5%**	**Y**	**FAC**
4. **Festuca arundinacea**	**30%**	**Y**	**FAC**
5. **Cirsium arvense**	**5%**	**Y**	**FACU**
6. **Equisetum arvense**	**5%**	**Y**	**FAC**
7. **Lapsana communis**	**5%**	**Y**	**NOL**
8.	%		
9.	%		
10.	%		
11.	%		
	55%	= Total Cover	
Woody Vine Stratum (Plot Size: **30' circle**)			
1. **Hedera helix**	**0%**		**NOL**
2. **Clematis spp.**	**0%**		**FAC**
	0%	= Total Cover	

% Bare Ground in Herb Stratum **50%**

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC:	**3**	(A)
Total Number of Dominant Species Across All Strata:	**8**	(B)
Percent of Dominant Species That Are OBL, FACW, or FAC:	**37%**	(A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species	x1 =
FACW species	x2 =
FAC species	x3 =
FACU species	x4 =
UPL species	x5 =
Column Totals: (A)	(B)

Prevalence Index = B/A =

Hydrophytic Vegetation Indicators:

- ☐ 1 - Rapid Test for Hydrophytic Vegetation
- ☐ 2 - Dominance Test is >50%
- ☐ 3 - Prevalence Index is ≤3.0[1]
- ☐ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
- ☐ 5 - Wetland Non-Vascular Plants[1]
- ☐ 6 - Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes** ☐ No ☒

Remarks: **Area has been brush hogged. Area may have also been used to store leaves from the fall, and since scraped off explaining the sparce herbaceous vegetation.**

SOIL

Project Site: **4909 SE International Way, SE corner of Lot 300**

Sampling Point: **P3**

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (Moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 - 4	7.5YR3/3	100%		%			Silt clay loam	
		%		%				
4 - 18	7.5YR4/3	85%	5YR4/6	1%	C	M	Silt clay loam mixed matrix about 10% rock	
	7.5YR4/2	10%	10YR2/1	4%	C	M		
		%		%				
18 - 20	2.5YR4/3	80%	5YR4/4	19%	C	M	Silt clay loam mixed matrix 50% Rock	
		%	10YR6/1	1%	C	M		
		%		%				

[1]Type: C= Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1) **(except MLRA 1)**
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ☐ 2 cm Muck (A10)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type:

Depth (Inches):

Hydric Soils Present? **Yes** ☒ **No** ☐

Remarks: **Soil is fill and mixed. Soil is jumbled, not in layers. Hydric features are likely historic from whatever the source of the soils was.**

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Surface Soil Cracks (B6)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Water-Stained Leaves (B9) **(except MLRA 1, 2, 4A, and 4B)**
- ☐ Salt Crust (B11)
- ☐ Aquatic Invertebrates (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Oxidized Rhizospheres along Living Roots (C3)
- ☐ Presence of Reduced Iron (C4)
- ☐ Recent Iron Reduction in Tilled Soils (C6)
- ☐ Stunted or Stresses Plants (D1) **(LRR A)**
- ☐ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ☐ Water-Stained Leaves (B9) **(MLRA 1, 2, 4A, and 4B)**
- ☐ Drainage Patterns (B10)
- ☐ Dry-Season Water Table (C2)
- ☐ Saturation Visible on Aerial Imagery (C9)
- ☐ Geomorphic Position (D2)
- ☐ Shallow Aquitard (D3)
- ☐ FAC-Neutral Test (D5)
- ☐ Raised Ant Mounds (D6) **(LRR A)**
- ☐ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present?	Yes	☐	No	☒	Depth (inches):
Water Table Present?	Yes	☐	No	☒	Depth (inches): **> 20"**
Saturation Present? (includes capillary fringe)	Yes	☐	No	☒	Depth (inches):

Wetland Hydrology Present? **Yes** ☐ **No** ☒

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: **No indicators in spite of heavy recent rains. Area was recently mowed, and that the mower did not leave deep tire ruts, (like it would have in muddy areas), is further evidence that wetland hydrology is lacking.**

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project Site: **4909 SE International Way, SE corner of Lot 300** City/County: **Milwaukie** Sampling Date: **6/12/2012**

Applicant/Owner: **Blount International, Inc** State: OR Sampling Point: **P4**

Investigator(s): **John McConnaughey / www.etcEnvironmental.net** Section, Township, Range: **1S2E31CD Lot 300**

Landform (hillslope, terrace, etc.): **Bench** Local relief (concave, convex, none): **concave** Slope (%): **1-2%**

Subregion (LRR): **LRR-A** Lat: **N 45.370963** Long: **W 122.702464°** Datum: **1984**

Soil Map Unit Name: **Aloha Silt Loam** NWI classification: **Not a wetland**

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.) **About average**

Are Vegetation ☒, Soil ☒, Or Hydrology ☐, significantly disturbed? Are "Normal Circumstances" present? Yes ☐ No ☒

Are Vegetation ☐, Soil ☐, Or Hydrology ☐, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes	☒	No	☐	**Is sampled area in a wetland?** **Yes** ☐ **No** ☒
Hydric Soil Present?	Yes	☒	No	☐	
Wetland Hydrology Present?	Yes	☐	No	☒	

Remarks: **Plot represents a slight depression that continues down to the east toward P1 and P2. Area has recently been mowed or brush hogged. Herbs and shrubs are disturbed.**

VEGETATION – Use scientific names of plants

Tree Stratum (Plot Size: **15' x 30'**)	Absolute % Cover	Dominant Species?	Indicator Status
1. **Fraxinus lattifolia**	**22%**	**Y**	**FACW**
2. **Thuja plicata**	**11%**	**Y**	**FAC**
3.	**%**		
4.	**%**		
	33%	= Total Cover	
Sapling/Shrub Stratum (Plot Size: **15' X 30'**)			
1. **Rubus discolor**	**5%**	**Y**	**FACU**
2.	**%**		
3.	**%**		
4.	**%**		
5.	**%**		
	5%	= Total Cover	
Herb Stratum (Plot Size: **5**)			
1. **Festuca aerundinacea**	**70%**	**Y**	**FAC**
2. **Holcus lanatus**	**20%**	**Y**	**FAC**
3. **Tolmiea menziesii**	**1%**	**N**	**FAC**
4. **Taraxacum officinale**	**10%**	**N**	**FACU**
5. **Ranunculus repens**	**1%**	**N**	**FACW**
6. **Epilobium ciliatum**	**1%**	**n**	**FACW**
7. **Rumex occidentalis**	**1%**	**N**	**FACW**
8. **Hedera helix**	**2%**	**N**	**NOL**
9.	**%**		
10.	**%**		
11.	**%**		
	%	= Total Cover	
Woody Vine Stratum (Plot Size: **30' circle**)			
1. **Hedera helix**	**0%**		**NOL**
2. **Clematis spp.**	**0%**		**FAC**
	0%	= Total Cover	

% Bare Ground in Herb Stratum **%**

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC:	**4**	(A)
Total Number of Dominant Species Across All Strata:	**5**	(B)
Percent of Dominant Species That Are OBL, FACW, or FAC:	**80%**	(A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species	x1 =
FACW species	x2 =
FAC species	x3 =
FACU species	x4 =
UPL species	x5 =
Column Totals: (A)	(B)

Prevalence Index = B/A =

Hydrophytic Vegetation Indicators:

- ☐ 1 - Rapid Test for Hydrophytic Vegetation
- ☒ 2 - Dominance Test is >50%
- ☐ 3 - Prevalence Index is ≤3.0[1]
- ☐ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
- ☐ 5 - Wetland Non-Vascular Plants[1]
- ☐ 6 - Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes** ☒ No ☐

Remarks: **Herbs and shrubs are periodically mowed and treated with herbicide, and probably do not provide good wetland indicators.**

SOIL

Project Site: **4909 SE International Way, SE corner of Lot 300**

Sampling Point: **P4**

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (Moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 - 12	**10YR3/2**	**70%**	**5YR4/6**	**10%**	**C**	**M**	**Silty clay loam, mottles are distinct**	
	2.5YR6/2	**20%**		**%**				
		%		**%**				
12 - 20	**5YR2.5/1**	**55%**	**5YR4/6**	**5%**	**C**	**M**	**Silty clay loam**	
	10YR3/2	**40%**		**%**				
		%		**%**				
20 - 24	**5YR2.5/1**	**100%**		**%**			**Silty clay loam**	
		%		**%**				

[1]Type: C= Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1) **(except MLRA 1)**
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ☐ 2 cm Muck (A10)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type:

Depth (Inches):

Hydric Soils Present? **Yes** ☒ **No** ☐

Remarks: **Soil is fill, different colors and textures are jumbled togeather, not in layers.**

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Surface Soil Cracks (B6)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Water-Stained Leaves (B9) **(except MLRA 1, 2, 4A, and 4B)**
- ☐ Salt Crust (B11)
- ☐ Aquatic Invertebrates (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Oxidized Rhizospheres along Living Roots (C3)
- ☐ Presence of Reduced Iron (C4)
- ☐ Recent Iron Reduction in Tilled Soils (C6)
- ☐ Stunted or Stresses Plants (D1) **(LRR A)**
- ☐ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ☐ Water-Stained Leaves (B9) **(MLRA 1, 2, 4A, and 4B)**
- ☐ Drainage Patterns (B10)
- ☐ Dry-Season Water Table (C2)
- ☐ Saturation Visible on Aerial Imagery (C9)
- ☐ Geomorphic Position (D2)
- ☐ Shallow Aquitard (D3)
- ☐ FAC-Neutral Test (D5)
- ☐ Raised Ant Mounds (D6) **(LRR A)**
- ☐ Frost-Heave Hummocks (D7)

Field Observations:

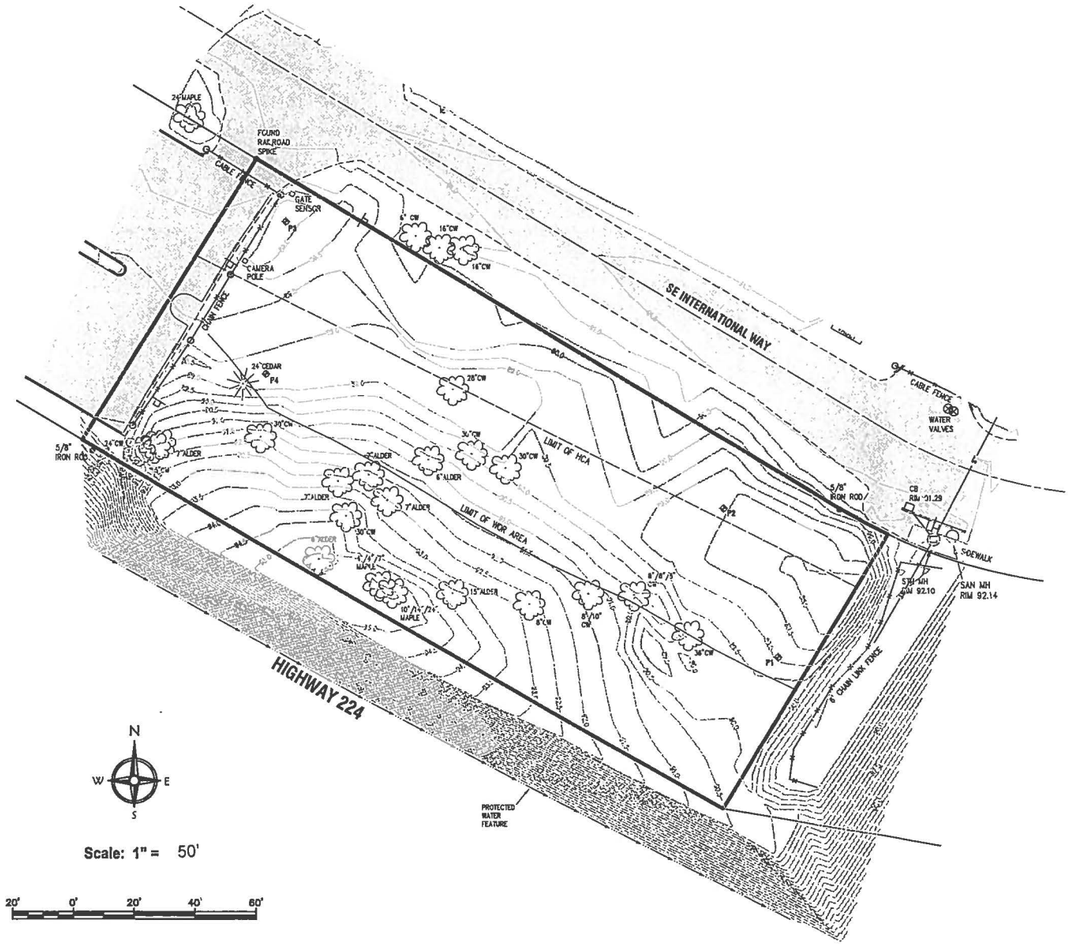
Surface Water Present?	Yes	☐	No	☒	Depth (inches):
Water Table Present?	Yes	☐	No	☒	Depth (inches): **> 24"**
Saturation Present? (includes capillary fringe)	Yes	☐	No	☒	Depth (inches):

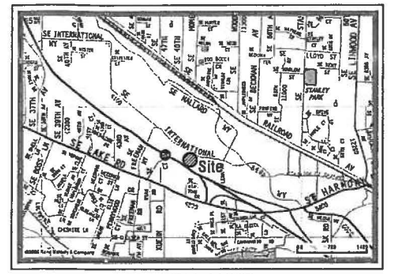
Wetland Hydrology Present? **Yes** ☐ **No** ☒

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

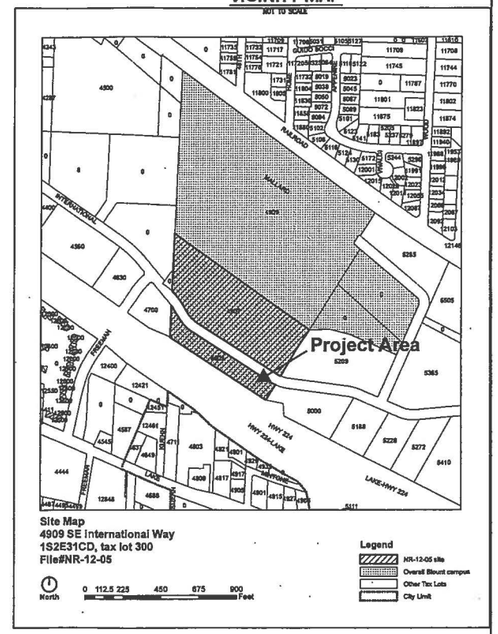
Remarks: **No indicators - the area has been recently mowed, and that the machinery did not leave tire ruts (like it would in a muddy area) is further evidence of a lack of wetland hydrology..**

BLOUNT INTERNATIONAL, INC.
PARKING LOT ADDITION
MILWAUKIE, OREGON





VICINITY MAP
NOT TO SCALE



Site Map
4909 SE International Way
1S2E31CD, tax lot 300
File#NR-12-05

North
0 112.5 225 450 675 900 Feet

Legend
- NR-12-05 site
- Overall Blount campus
- Other Tax Lots
- City Limit

LEGEND

- EXISTING DECIDUOUS TREE
- EXISTING CONIFEROUS TREE
- EXISTING UTILITY POLE
- EXISTING POWER VAULT
- EXISTING TELEPHONE RISER
- EXISTING MAILBOX
- EXISTING GAS VALVE
- EXISTING STORM MANHOLE
- EXISTING CATCH BASIN
- EXISTING SANITARY MANHOLE
- EXISTING WATER VALVE
- EXISTING WATER METER
- EXISTING FIRE HYDRANT
- EXISTING LIGHT POLE
- EXISTING BOLLARD
- EXISTING SIGN
- WETLAND DELINEATION DATA PLOT

- EXISTING RIGHT-OF-WAY
- EXISTING PROPERTY LINE
- EXISTING CENTERLINE
- EXISTING CURB
- EXISTING EDGE OF PAVEMENT
- EXISTING FENCE LINE
- EXISTING GRAVEL EDGE
- EXISTING POWER LINE
- EXISTING GAS LINE
- EXISTING STORM SEWER LINE
- EXISTING SANITARY SEWER LINE
- EXISTING WATER LINE
- PROPERTY BOUNDARY
- PROPOSED PARKING
- PROPOSED CURB
- EXISTING GROUND CONTOUR (0.5 FT)
- EXISTING CONCRETE
- EXISTING PAVEMENT

SHEET INDEX

REGISTERED PROFESSIONAL ENGINEER
OREGON JULY 25, 2012
NORMAN J. HARNER

EXPIRES: 06/30/2013
SIGNATURE DATE: 07/31/2012

EXISTING CONDITIONS PLAN

DRAWN	MMM	DESIGNED	NJH	CHECKED
SCALE	1" = 50'	DATE	JANUARY, 2012	
PLAN	6992 Pre Parking Acad2007.dwg			

DATE | NO. | REVISION

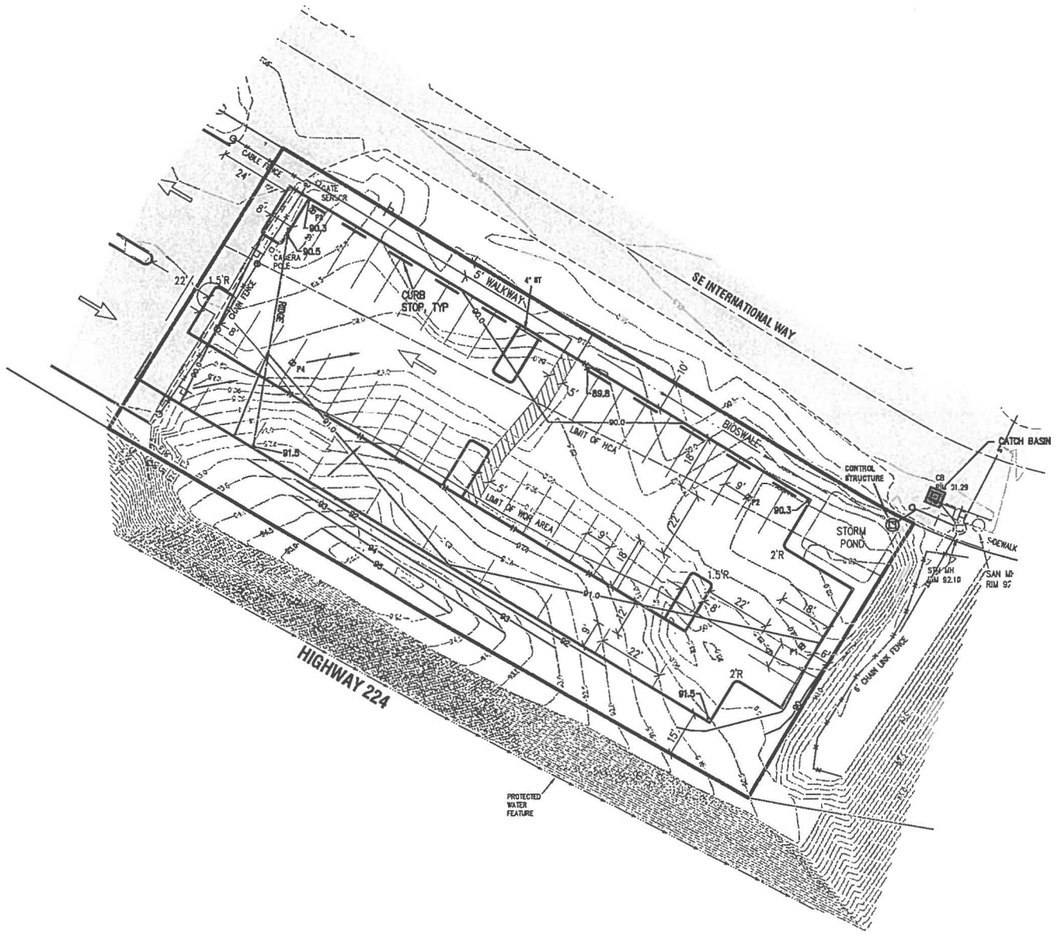
COMPASS ENGINEERING
engineering surveying planning
4107 SE International Way, Suite 705
Milwaukie, Oregon 97222
503.653.9093
www.compass-engineering.com

BLOUNT INTERNATIONAL, INC.
4909 SE INTERNATIONAL WAY
MILWAUKIE, OREGON 97222
503-653-4694

NEW PARKING ADDITION
4909 SE INTERNATIONAL WAY
MILWAUKIE, OREGON 97222

1/3

P:\6900\6992\AutoCAD\6992 Pre Parking2 Acad2007.dwg, 7/16/2012 8:38:42 AM



Scale: 1" = 50'

LEGEND

- EXISTING GROUND CONTOUR (0.5 FT)
- PROPOSED CONTOUR (1.0 FT)
- EXISTING DECIDUOUS TREE TO REMAIN (SIZE & SPECIES AS NOTED)
- EXISTING CONIFEROUS TREE TO REMAIN (SIZE & SPECIES AS NOTED)
- EXISTING TREE TO BE REMOVED

ESTIMATED CUT = 500 CU. YD
ESTIMATED FILL = 650 CU. YD.

REGISTERED PROFESSIONAL ENGINEER
OREGON JULY 10, 1979
BRIAN J. HARKER

EXPIRES: 06/30/2013
SIGNATURE DATE: 07/16/2012

Preliminary Grading & Drainage Plan

DATE	NO.	REVISION

DRAWN MMM | DESIGNED NJH | CHECKED
SCALE 1" = 50' | DATE JANUARY, 2012
PLAN 6992 Pre Parking2 Acad2007.dwg

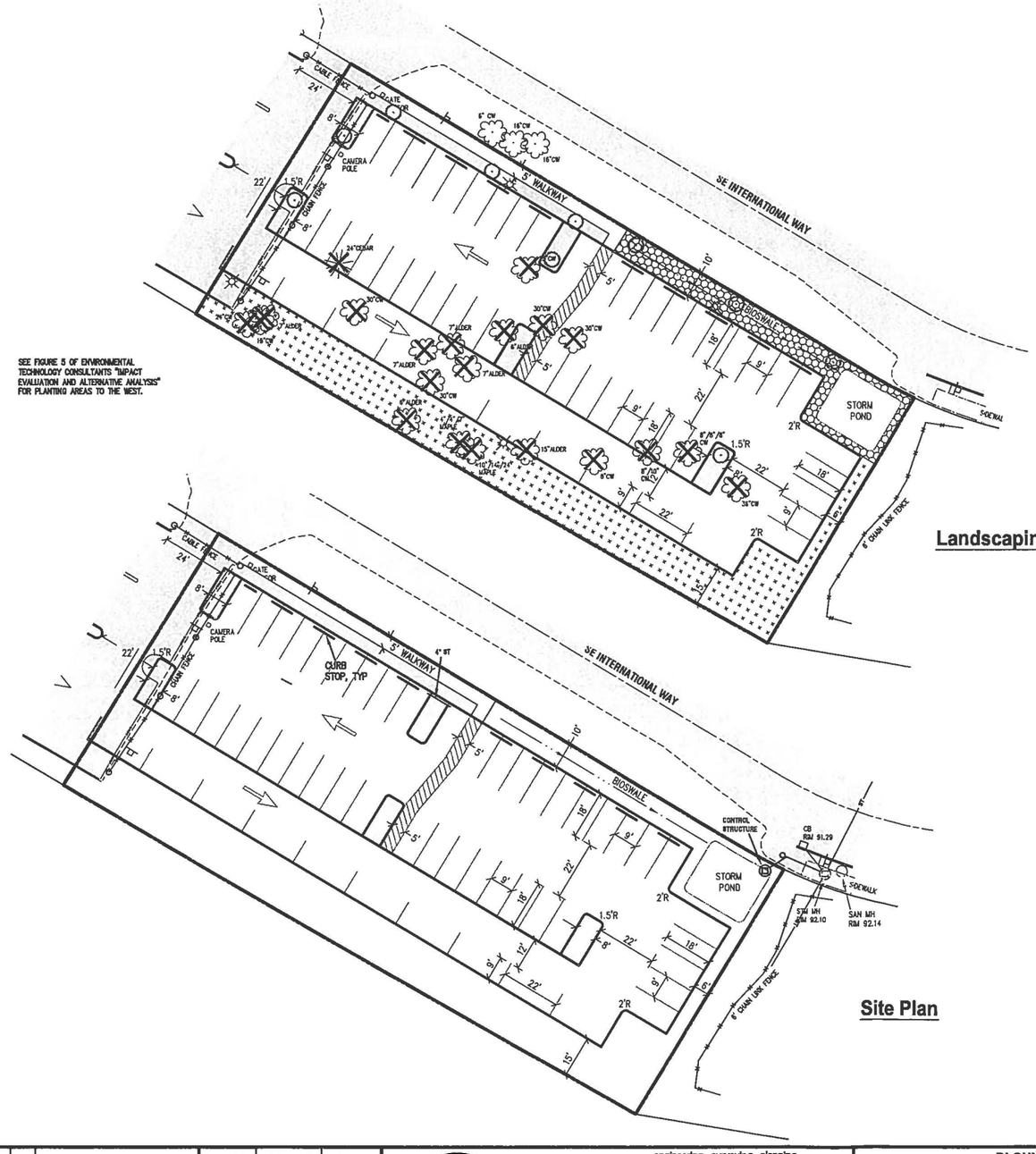
COMPASS ENGINEERING
engineering surveying planning
4107 SE International Way, Suite 705
Milwaukie, Oregon 97222
503.653.9093
www.compass-engineering.com

BLOUNT INTERNATIONAL, INC.
4909 SE INTERNATIONAL WAY
MILWAUKIE, OREGON 97222
503-653-4694

NEW PARKING ADDITION
4909 SE INTERNATIONAL WAY
MILWAUKIE, OREGON 97222

2/3

SEE FIGURE 5 OF ENVIRONMENTAL TECHNOLOGY CONSULTANTS "IMPACT EVALUATION AND ALTERNATIVE ANALYSIS" FOR PLANTING AREAS TO THE WEST.



Landscaping Plan

Site Plan

MITIGATION PLANTINGS

Table 5. Planting Recommendations. 152 Trees and 762 Shrubs are required per 19.402.11.D.2.b. Substitutions may be allowed depending on species availability from nurseries at the time of planting.

Trees	Flat Areas	Steep Slope	Stream Bank
Scouler Willow, *Salix scouleriana*			50
Quaking Aspen, *Populus tremuloides*		15	
Garry Oak, *Quercus garryana*	27		
Bitter Cherry, *Prunus emarginata*		10	
Western Red Cedar, *Thuja plicata*		8	
Grand Fir, *Abies grandis*		6	
Douglas Fir, *Pseudotsuga menziesii*		10	
Western Hemlock, *Tsuga heterophylla*	27		
SUB TOTAL TREES	54	49	50
GRAND TOTAL TREES		152	

Shrubs	Flat Areas	Steep Slope	Stream Bank
Shrubs for Planting on Steep Slope Adjacent to WRQ			
Hazelnut, *Corylus cornuta*		63	
Ocean-spray, *Holodiscus discolor*		50	
Osoberry, *Oemleria cerasiformis*		50	
Pacific Ninebark, *Physocarpus capitatus*			50
Common Snowberry, *Symphoricarpos albus*		100	
Black Twinberry, *Lonicera hispidula*			50
Red Osier Dogwood, *Cornus sericea*			50
Douglas Spirea, *Spiraea douglasii*		50	
Oval-leaved Viburnum, *Viburnum ellipticum*		50	
Flowering Shrubs for Ornamental Arrangements Between Slope and Parking lot.			
Dull Oregon Grape, *Berberis nervosa*	50		
Salal, *Gaultheria shallon*	50		
Red Currant, *Ribes sanguineum*	50		
Tall Oregon Grape, *berberis aquifolium*	50		
Mockorange, *Philadelpus lewisii*	50		
SUBTOTAL SHRUBS	250	363	150
GRAND TOTAL SHRUBS		762	

Scale: 1" = 50'

20' 0' 20' 40' 80'

Legend

- MITIGATION PLANTINGS
- TREE
- STORM SWALE AND POND PLANTING (LAWN SOD)
- MULCH
- LIGHT POLE

INTERIOR LANDSCAPE REQUIRED: 25 SQ. FT./SPACE = 52x25 = 1300 SQ. FT.

INTERIOR LANDSCAPE PROVIDED: 1358 SQ. FT.

REGISTERED PROFESSIONAL ENGINEER 5612 OREGON JULY 30, 1976 NORMAN J HARKER

EXPIRES: 06/30/2013

SIGNATURE DATE: 07/10/2012

Preliminary Site Plan and Landscaping Plan

DATE	NO.	REVISION

DRAWN MMM | DESIGNED NJH | CHECKED

SCALE 1" = 50' | DATE JANUARY, 2012

PLAN 6992 Pre Parking Acad2007.dwg

engineering surveying planning
COMPASS ENGINEERING
4107 SE International Way, Suite 705
Milwaukie, Oregon 97222
503.653.9093
www.compass-engineering.com

BLOUNT INTERNATIONAL, INC.
4909 SE INTERNATIONAL WAY
MILWAUKIE, OREGON 97222
503-653-4694

NEW PARKING ADDITION
4909 SE INTERNATIONAL WAY
MILWAUKIE, OREGON 97222

3/3

P:\6900\6992\AutoCAD\6992 Pre Parking2 Acad2007.dwg, 7/16/2012 8:42:04 AM

APPENDIX D) TABLE OF ACRONYMS

DSL or ODSL = Oregon Department of State Lands.

HCA = Habitat Conservation Area. A buffer extending from the extent of the WQR for a distance of 50'

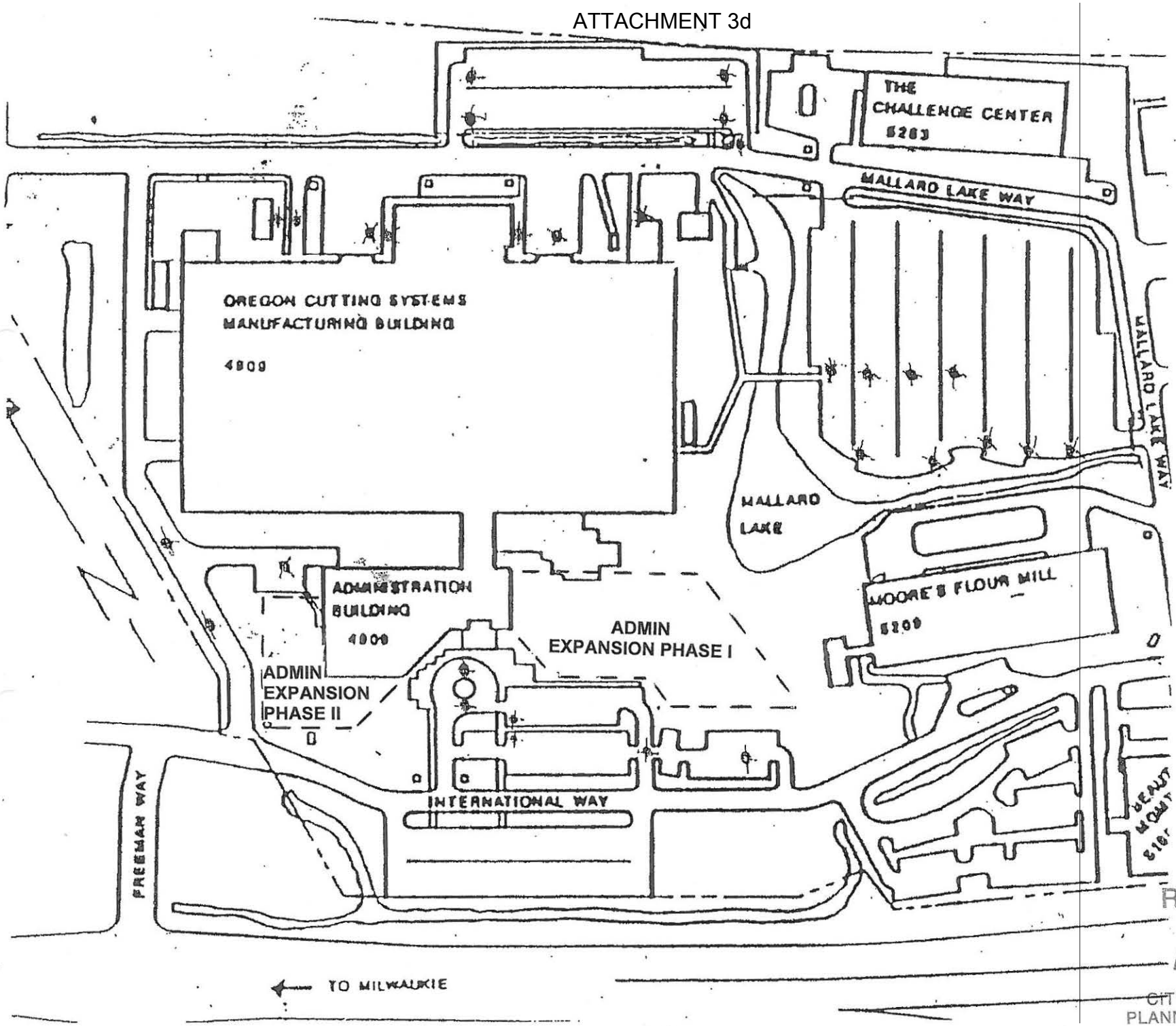
LWD = Large Woody Debris

ODOT = Oregon Department of Transportation.

PWS = Professional Wetland Scientist

WQR = Water Quality Resource, a City of Milwaukie designation for a water or wetland feature requiring protection. The water or wetland, plus a buffer of 15' to 200' are considered to be the WQR. The buffer width is determined by the type of feature and the slope adjacent to the feature according to table 19.402.15.

ATTACHMENT 3d



MEMORANDUM

TO: Community Development Department

THROUGH: Gary Parkin, Director of Engineering

FROM: Brad Albert, Civil Engineer

RE: 4909 SE International Way
NR-12-05

DATE: August 1, 2012

Expand an existing parking lot by 53 spaces, with some disturbance of designated Water Quality Resource and Habitat Conservation Areas.

Recommended Conditions of Approval

None

Advisory Notes

The following are advisory notes for the applicant. The advisory notes are a list of requirements that may apply to the proposed development at the time of building permit. The advisory notes are for informational purposes only.

Storm Water Management

Submit a storm water management plan prepared by a qualified professional engineer with required development/building permits as part of the proposed development. The plan shall conform to Section 2 – Stormwater Design Standards of the City of Milwaukie Public Works Standards.

- The storm water management plan shall demonstrate that the post-development runoff does not exceed the pre-development, including any existing storm water management facilities serving the development site.
- The storm water management plan shall demonstrate compliance with water quality standards in accordance with the City of Portland Stormwater Management Manual.
- Development/building permits will not be issued for construction until the storm water management plan has been approved by the City of Milwaukie.

ESA
522 SW Fifth Avenue
Suite 820
Portland, OR 97204
503.226.8018 phone
503.226.8017 fax
www.esassoc.com

memorandum

date August 8, 2012

to Brett Kelver

from Sarah Hartung, Senior Biologist

subject Natural Resource Review for parking expansion at Blount International

This memo has been prepared to satisfy the Task Order for the Natural Resource Review for parking expansion at Blount International (Land Use File #NR-12-05). This review includes responses to the following items:

1. Conduct a site visit to assess existing conditions and generally corroborate the figures and narrative provided in the application submittal.
2. Within the revised application submittal is the Impact Evaluation and Alternatives Analysis report prepared by Environmental Technology Consultants. Review the report and comment on the thoroughness and accuracy of the applicant's responses to the following required items:

   a. Identification of the ecological functions of riparian habitat on the property;

   b. Inventory of vegetation, sufficient to categorize the existing condition of the WQR, in accordance with MMC Table 19.402.11.C

   c. Assessment of the project's impacts on the WQR

   d. Analysis of alternatives to the proposed development, including an explanation of the rationale behind choosing the alternative selected.

   e. Mitigation plan that ensures the disturbed portions of the WQR be restored to an equal or better condition.
3. Evaluate the proposed activity with respect to the 3 approval criteria established in MMC 19.402.12B:

   a. Avoid – the proposed activity will have less detrimental impact to the designated natural resource than other practicable alternatives.

   b. Minimize – Where impacts cannot be avoided, the proposed activity shall minimize detrimental impacts to the extent practicable.

   c. Mitigate – The proposed mitigation plan demonstrates appropriate and adequate mitigation for adverse impacts to the designated natural resource.
4. Summarize findings in a written report in a general format with references to specific code sections as necessary. In noting deficiencies in the application, please indicate whether you believe the deficiency (1) needs to be resolved with revised materials prior to issuance of a decision, (2) can be resolved through adding a condition of approval, or (3) does not impact the overall review of the proposal.

Findings

1. *Conduct a site visit to assess existing conditions and generally corroborate the figures and narrative provided in the application submittal.*

A site visit was conducted on August 1, 2012 to assess existing conditions. The narrative describes the project area with accuracy and captures the overall character of the undeveloped portion of the site. The canopy cover looked to be accurate, estimated at 70 percent cover. The figures also appear accurate, with the exception that several of the surveyed trees are mislabeled on Sheet 3/3, Landscaping Plan. The location and size of trees reflect current conditions, but about eight of the trees that are labeled as black cottonwood "CW" are a mix of Oregon ash, red alder, and willow. Two of the alders at the south end are also mislabeled. The mislabeling does not affect the review, but might be useful feedback for the applicant especially when considering appropriate replacement trees for the mitigation plan.

The conditions of the WQR feature are also accurately described for the most part. The stream is located in a deep ravine with steep slopes with several red alder trees rooted on and at the bottom of the slopes. The understory of the ravine is dominated by Armenian (or Himalayan) blackberry and non-native clematis with the occasional native sword fern at the base of the slope. Other species present include fringecup (native), jewelweed, and clematis (non-native). Water was observed flowing in the stream during the August 1 field visit, indicating that the feature is likely a perennial waterbody. From a vantage point at the top of the ravine, water depth was estimated at 3 to 5 inches. The narrative included a statement that the stream runs dry in the summertime according to Blount employees, but this had not been verified and the application assumed the feature was perennial, which appears correct.

2. *Within the revised application submittal is the Impact Evaluation and Alternatives Analysis report prepared by Environmental Technology Consultants. Review the report and comment on the thoroughness and accuracy of the applicant's responses to the following required items:*

    a. *Identification of the ecological functions of riparian habitat on the property;*

    The ecological functions were identified with reasonable accuracy. The WQR feature is judged to provide limited habitat due to its small size and the fact that it is surrounded by urban development. Despite the WQR's limitations, the off-site red alder trees rooted on the sides and bottom of the ravine shade the stream and stabilize the slopes. The topography also aids in shading the stream. The habitat on-site provides limited foraging opportunities for songbirds including black-capped chickadees and cedar waxwings which were observed during the August 1 field visit. Foraging opportunities for birds would be slightly reduced with the proposed project but would still be available in the ravine and in the project vicinity.

    b. *Inventory of vegetation, sufficient to categorize the existing condition of the WQR, in accordance with MMC Table 19.402.11.C*

    The narrative indicates that on-site vegetation qualifies as Class B, "Marginal" based on 100% ground cover and a canopy cover of 70%. In our initial review, it appeared that the determination of "Marginal" was correct, but based on a second look at the code definition the vegetation meets the definition of Class A, "Good," because the canopy cover is greater than 50% and ground cover is at 100%. This would change the mitigation requirement to "*submit a plan for mitigating water quality impacts related to the development, including: sediments, temperature, nutrients, or any other condition that may have caused the protected water feature to be listed on DEQ's 303(d) list.*" The intent is to increase mitigation requirements for impacting a WQR feature in "good" condition; however, the proposed mitigation plan is

judged to address these concerns and therefore would still meet the intent of the code. See below additional explanation. This discrepancy does not significantly affect the review.

c. Assessment of the project's impacts on the WQR

ESA is in agreement that the project would have minimal to no impact on stream functions such as microclimate and shade; streamflow moderation; water filtration, infiltration, and natural purification; bank stabilization, large wood recruitment, and organic material resources. These functions are provided by the existing vegetation at the bottom and on the slopes of the ravine, which will not be impacted by the project. The terrain of the site which slopes down to the north away from the ravine also provides a natural barrier between the proposed development and the stream.

d. Analysis of alternatives to the proposed development, including an explanation of the rationale behind choosing the alternative selected.

Four alternatives plus the proposed alternative were evaluated (Alternatives A-E). The city had instructed the applicant to restrict the alternatives analysis to only lot 300 (page 7/25); however, the applicant analyzed potential alternate sites located on the Blount campus, including an area where a future building is planned (Alternative E). Although it is outside of the project scope and code review, plans for a future building raise the question of how future parking needs will be addressed.

Alternative A is the proposed alternative and the narrative states that 57 off street parking spaces will be added (page 7/25). The plans appear to show either 52 or 53 parking spaces depending on interpretation and earlier in the narrative the project is stated as proposing 52 spaces. For the purpose of this review, 52 is assumed to be the correct number. This discrepancy does not significantly impact the review, but it raises the question of how many parking spaces are actually needed to address the issue of overcrowding.

The narrative describes that other parts of the solution to the parking problem are to increase use of carpooling, mass transit, etc. (page 3 of 25), but this topic is not explored in any detail and should be included as an alternative to achieving the purpose and need of the project. ESA recommends that this deficiency be addressed in revised application materials.

e. Mitigation plan that ensures the disturbed portions of the WQR be restored to an equal or better condition.

The mitigation plan proposes to restore the WQR to equal or better conditions. Non-native invasive species (blackberry, clematis, and ivy) will be removed from the top of the slope of the ravine and several native trees and shrubs will be planted. Native plantings are based on the impact area calculation (Option 2), which yields a larger number of plants than Option 1. Plantings are proposed for the top of the slope just south of the proposed parking area, as well as along the top of slope south of the existing parking lot, and on both sides of the stream at the west end of lot 300. The top of the slope currently lacks a native shrub layer and contains compacted soil as well as weedy herbaceous species. The top of the slope is in shade to part shade due to the tall trees in the ravine to the south that will be retained.

The plan calls for installing Oregon white oak (Garry oak or *Quercus garryana*) alternating with western hemlock on the flat part at the top of the slope where it is relatively shady (see image below). Species other than Oregon white oak are recommended for this location to increase the likelihood of mitigation success. Instead of Oregon white oak, ESA recommends using big-leaf maple, grand fir, western red cedar and/or Oregon ash. Oregon white oak is relatively slow-growing and does best in full sun, therefore is not ideal for this location. Additionally, consider planting more than just two tree species at the top of the slope.

Photo 1. Looking west at the ravine and off-site WQR feature. Note shady conditions at top of slope where Oregon white oak and western hemlock are proposed for planting (3:00 pm, 8/1/12).

3. *Evaluate the proposed activity with respect to the 3 approval criteria established in MMC 19.402.12B:*

   a. *Avoid – the proposed activity will have less detrimental impact to the designated natural resource than other practicable alternatives.*

   The application does not address the practicable alternative of increasing incentives for carpooling or using mass transit and other means (bike, walk, etc) to achieve the purpose and need of the project. The code requires considering practicable alternatives that avoid impacts to the WQR feature and its vegetated buffer. ESA recommends that this deficiency be addressed as part of revised application materials.

   b. *Minimize – Where impacts cannot be avoided, the proposed activity shall minimize detrimental impacts to the extent practicable.*

   The narrative describes Alternative B as a larger parking lot proposed for the site that was rejected because it would have 2,558 sf of additional impact. However it's not clear from the narrative how many additional parking spaces are actually needed to solve the parking problem on International Way. The selected alternative proposes 52 additional off street parking spaces, but is it possible to eliminate the proposed 9 or 10 parking spaces at the south end of the proposed project to further minimize impacts? ESA recommends that this deficiency be addressed as part of revised application materials.

   c. Mitigate – The proposed mitigation plan demonstrates appropriate and adequate mitigation for adverse impacts to the designated natural resource.

   The mitigation would remove invasive species from the top of slope and ravine within lot 300 and would revegetate the top of the slope to the south of the proposed parking lot, providing a barrier between development and the WQR feature. Mitigation would also improve conditions along the south end of the existing parking lot as well as the west end of the parcel. A majority of the proposed mitigation area is dominated by a non-native/invasive shrub and vine layer and would benefit from weed control and native

plant installation. The mitigation seems adequate with one adjustment – replacing Oregon white oak with more suitable species at the top of the slope.

Kelver, Brett

From: Boumann, Mike <michaelbou@CCFD1.com>
Sent: Monday, August 13, 2012 8:49 AM
To: Kelver, Brett
Subject: RE: comments on Milwaukie's NR-12-05? (Blount parking expansion)

Hi Brett,

The fire district does not have any comments for this proposal. Thanks for asking.

Mike

From: Kelver, Brett [mailto:KelverB@ci.milwaukie.or.us]
Sent: Friday, August 10, 2012 4:21 PM
To: Boumann, Mike
Subject: comments on Milwaukie's NR-12-05? (Blount parking expansion)

Mike,

I'm about a week late in following up with you to see CCFD has any comments on the land use application NR-12-05, a proposal to expand an existing parking area on SE International Way at the Blount International campus. If you could send me any comments by Tuesday 8/14 that would be a big help, as I'm going to try to wrap up the staff report and PC packet materials before the end of next week. Sorry not to touch base with you sooner! Thanks!

* * * * * * * *

Brett Kelver, AICP
Associate Planner
City of Milwaukie
6101 SE Johnson Creek Blvd
Milwaukie, OR 97206
Tel – (503) 786-7657
Fax – (503) 774-8236
kelverb@ci.milwaukie.or.us

ATTACHMENT 4d

Kelver, Brett

From: Larsen, Tom
Sent: Tuesday, August 14, 2012 1:37 PM
To: Kelver, Brett
Subject: NR-12-05; Blount

Brett,
I have no comment on this application.

Tom Larsen, CBO
Building Official, City of Milwaukie
Phone: (503) 786-7611
Fax: (503) 786-7612

List of Materials in the Official Record
(NR-12-05 – Blount Parking Expansion)

The following documents are part of the official record for this application (NR-12-05):
(current as of 8/20/12)

A. Application Forms
(first submittal received May 8, 2012)

1. Natural Resource Review application form
2. Submittal Requirements Checklist
3. Proof of Ownership

B. Applicant's Submittal Materials
(revised materials received July 17, 2012, unless otherwise noted):

1. Narrative Addressing Code Sections
2. Impact Evaluation and Alternatives Analysis
   Appendices:
   a. Appendix A: Figures
      - Figure 1 – Proposed Impact and Alternatives
      - Figure 2 – Milwaukie Natural Resources Overlay Map
      - Figures 3A & 3B – Temporary and Permanent Impact Areas
      - Figure 4 – Typical Mitigation Planting
      - Figure 5 – Mitigation Planting Areas
      - Figure 6 – Page from the Blount Master Plan
   b. Appendix B: Ground Level Color Photographs
   c. Appendix C: Wetland Data Forms
   d. Appendix D: Table of Acronyms
3. Preapplication Conference Report (for meeting on 1/26/12)
4. Plan Set (11"x17")
   a. Existing Conditions Plan
   b. Preliminary Grading and Drainage Plan
   c. Preliminary Site Plan and Landscape Plan
5. Plan Set (24"x36")
   a. Existing Condition Plan
   b. Preliminary Grading and Drainage Plan
   c. Preliminary Landscape Plan
6. Updated Page from the Blount Master Plan *(received August 16, 2012)*

C. Public Notification Information

1. Application Referral form
2. Notice posted at the site
3. Sign Posting Affidavit
4. Notice mailed to properties within 300' radius w/ site map *(mailed on 8/08/12)*
5. Certification of Legal Notice Mailing, with Mailing List for properties within 300 ft
6. Application Materials form (to PC and City Attorney)

D. Public Comments Received

(none to date)

E. Agency Responses

1. Brad Albert, City of Milwaukie Engineering Department – Comments related to public facility improvements.
2. Sarah Hartung, Senior Biologist with ESA (the City's on-call natural resource consultant) – Record Item J-7 (Review and analysis of applicant's materials, including existing conditions, alternatives analysis, and mitigation plan)
3. Mike Boumann, Clackamas County Fire District #1 – No comments.
4. Tom Larsen, City of Milwaukie Building Official – No comments.

F. Public Testimony Received at Public Hearing

August 28, 2012 (Planning Commission)

1. _____

G. Other Interested Persons (w/ Standing)

(none to date)

H. Materials Received/Presented at Public Hearing

August 28, 2012 (Planning Commission)

1. Staff Presentation (PowerPoint file)
2. _____

I. Staff Reports

1. Staff Report for August 28, 2012 (Planning Commission hearing)
   Attachments:
   a. Recommended Findings in Support of Approval
   b. Recommended Conditions of Approval
   c. Record Items B-1 through B-6 (Applicant's Submittal Materials)
   d. Record Items E-1 through E-4 (Agency Responses Received)
   e. List of Record

J. Background Materials/Other

1. Scoping letter – ESA completeness review of application (dated 5/18/12)
2. Letter addressing incompleteness items (dated 6/06/12)
3. Initial completeness review memo by ESA (received 6/04/12)
4. Completeness determination letter (dated 7/18/12)
5. Scoping letter – ESA full review of application (dated 7/19/12)
6. Invoice from ESA for completeness review of application (received 6/21/12)
7. Full review and analysis of applicant's submittal materials by ESA (received 8/08/12)