

1600 SE 190th Avenue, Portland OR 97233-5910 • PH. (503) 988-3043 • Fax (503) 988-3389

NOTICE OF NSA DECISION

Application for National Scenic Area Site Review

Case File: T2-2018-10387 **Applicant:** Carol Goss, Soderstrom Architects

Location: 35600 & 35800 E. Historic Columbia River Highway, Corbett
Tax Lot 100 , Section 34, Township 1 North, Range 4 East, W.M. (R944340760/
R322666)

Base Zone: Gorge General Rural Center (GGRC)

Landscape Setting: Village and Rural Residential

Proposal: Seismic retrofit which consists of alterations to the interior and exterior of the Corbett School District Gymnasium.

Decision: Approved.

Unless appealed, this decision is effective February 15, 2019 at 4:00 PM.

Issued by:

By: 
Katie Skakel, Senior Planner

For: Michael Cerbone, AICP
Planning Director

Date: Friday, February 1, 2019



Opportunity to Review the Record: A copy of the Planning Director Decision, and all evidence submitted associated with this application, is available for inspection, at no cost, at the Land Use Planning office during normal business hours. Copies of all documents may be purchased at the rate of 30-cents per page. The Planning Director Decision contains the findings and conclusions upon which the decision is based, along with any conditions of approval. For further information on this case, contact Katie Skakel, Senior Planner at 503-988-0213 katie.skakel@multco.us.

Opportunity to Appeal: This decision may be appealed within 14 days of the date it was rendered, pursuant to the provisions of MCC 38.0640. An appeal requires a \$250.00 fee and must state the specific legal grounds on which it is based. To obtain appeal forms or information on the procedure, contact the Land Use Planning offices at 1600 SE 190th Avenue (Phone: 503-988-3043). This decision cannot be appealed to the Columbia River Gorge Commission until all local appeals are exhausted.

This decision is final at the close of the appeal period, unless appealed. The deadline for filing an appeal is February 15, 2019 at 4:00 pm.

Applicable Approval Criteria: Multnomah County Code (MCC): General Criteria: MCC 38.0560 Code Compliance and Applications, MCC 38.0030 Existing Uses and Discontinued Uses, MCC 38.2425 Review Uses MCC 38.3090 Access MCC 38.0045 Review and Conditional Use Application – Submittal Requirements, MCC 38.0690 Expiration of Type II Decision, MCC 38.3425 Review Uses, MCC 38.3090 Access, Site Review Criteria MCC 38.7035(A), (B), (C) GMA Scenic Review Criteria, MCC 38.7045 GMA Cultural Resource Review Criteria, MCC 38.7055 GMA Wetland Review Criteria, MCC 38.7060 GMA Stream, Lake and Riparian Area Review Criteria, MCC 38.7065: GMA Wildlife Review Criteria, MCC 38.7070: GMA Rare Plant Review Criteria, and MCC 38.7080: Recreational Resource Review Criteria.

Copies of the referenced Multnomah County Code sections can be obtained by contacting our office or on our website at: <https://multco.us/landuse/zoning-codes/> under the link titled *Chapter 38 - Columbia River Gorge National Scenic Area*.

Conditions of Approval

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

1. Approval of this land use permit is based on the submitted written narrative(s) and plan(s). No work shall occur under this permit other than that which is specified within these documents. It shall be the responsibility of the property owner(s) to comply with these documents and the limitations of approval described herein.
2. Permit Expiration:
 - a. This land use permit shall expire as follows:
 - i. Within two (2) years of the date of the final decision if construction has not commenced, or; [MCC 38.0690(B)(1)]
 - ii. Within two (2) years of the date of commencement of construction, if the structure has not been completed, or; [MCC 38.0690(B)(2)]

Note: Once this decision is final, application for Land Use Planning building permit review may be made. When ready to have building permits signed off by Land Use Planning, the applicant shall complete the following steps:

1. Read your land use decision, the conditions of approval and modify your plans, if necessary, to meet any condition that states, "Prior to land use sign-off for building plan check..." Be ready to demonstrate compliance with the conditions.
2. Contact Katie Skakel, Senior Planner, at 503-988-0213 or katie.skakel@multco.us, for an appointment for review of the conditions of approval and to sign the building permit plans. Land Use Planning must sign off on the plans and authorize the building permit before you can go to the City of Gresham Building Department. At the time of this review, Land Use Planning will collect additional fees.

The above must be completed before the applicant can obtain building permits from the City of Gresham. Three (3) sets each of the site plan and building plans are needed for building permit sign off. At the time of building permit review, a fee will be collected.

Notice to Mortgagee, Lien Holder, Vendor, or Seller:

ORS Chapter 215 requires that if you receive this notice it must be promptly forwarded to the purchaser.

Findings of Fact

FINDINGS: Written findings are contained herein. The Multnomah County Code (MCC) criteria and Comprehensive Plan Policies are in **bold** font. Staff analysis and comments are identified as ‘**Staff:**’ and address the applicable criteria. Staff comments may include a conclusionary statement in *italic*.

1.00 Project Description:

Applicant: We are seeking to do a seismic retrofit to the Corbett School District Gymnasium which will alter the interior and exterior of a structure that is >50 years old. We have conducted a Seismic Hazard Evaluation for the structure and determined the following seismic deficiencies:

- Shear wall segments need to be added on the east, west and north sides of the 1954 Gym to adequately transfer lateral loads from the roof to the foundation. This involves the removal of some of the interior wood panels, the addition of structural panel sheathing, and the reinstallation of the wood boards. New boards that match the existing will be used on the north elevation. The existing boards from the north elevation will be used to patch the existing as needed.
- The glass blocks on the east and west sides of the 1954 Gym compromise the in-plane shear transfer from the roof to the foundation. The glass blocks also presents a danger of fall risk when a seismic event occurs. The glass blocks needs to be removed and replaced with plywood infill panels. The exterior finish will match the existing wood siding. The interior will be salvaged wood panels. The glass block grout contains asbestos.
- The two exterior brick wing walls flanking the main entry to the 1954 Gym on the north side of the building are leaning. The brick wall is unreinforced. These wing walls are to be removed and replaced with structural brick walls that will replicate the existing.
- The 1960 Science Wing roof diaphragm lacks adequate blocking compromising the shear transfer from the roof to the walls. The ceilings in the Science Wing are damaged and are proposed to be removed in order to add the roof blocking. New ceilings will be installed. Window sill anchorage is deficient throughout the building and additional anchorage will need to be added. Most of the locations can be reached from the interior. Some locations will require the removal and reinstallation of the exterior metal siding.

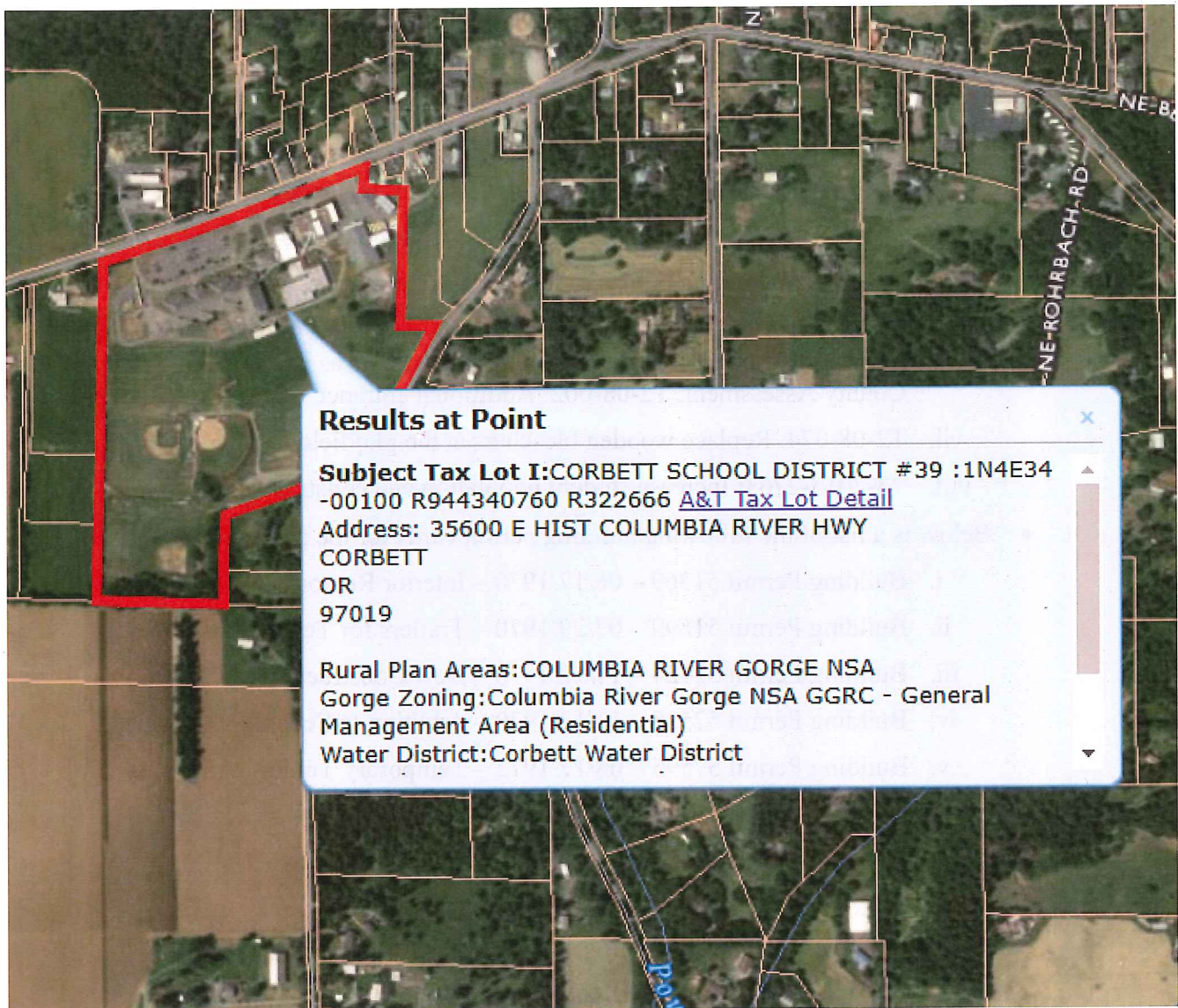
Staff: The proposed seismic upgrade effects the exterior of gymnasium building at the Corbett School location. The applicant has submitted a plan set that visually depicts the changes (Exhibit A.4). The seismic upgrade and the change to the exterior of the gymnasium building consists of replacement of wall segments on the east, west, and north side. The walls will be replaced with wood material that match the color and look of the existing building. The east and west sides of the building have existing glass blocks that will be removed and replaced with wood siding that matches the rest of the building. On the north side of the building, at the main entrance, there are two existing brick wing walls. The two brick wing walls will be replaced with a brick that has structural stability that does not change the appearance of the walls.

2.00 Property Description & History

The property consists of one tax lot and is described below.

Tax Lot: 100 Map: 1 North, 4 East, Section 34

Property ID # R944340760 R322666 Site Size: 36.24 Acres



The gymnasium building is located on Property zoned GGRC. There are no overlays. The property is located in the General Management Area.

The single-story, 9,350 square foot Gymnasium Building was originally built in 1954. The perimeter walls are wood-framed with sections that have brick veneer with glass block clerestories.

In 1960, a single-story, 2,340 square foot Science Wing was added to the west side of the building. The building is wood construction with brick on the north side and metal siding on the remaining elevations.

In 1970, a two-story, 6,300 square foot Physical Education Wing was added to the south side of the Gymnasium Building and a single-story, 3,540 square foot Industrial Arts Wing was added to the east side. The Industrial Arts Wing has been converted to a weight room with a team meeting room in the mezzanine. The perimeter walls are wood framed with metal siding.

Below is a list of the following land use reviews for the properties.

Assessment and Taxation indicates that there is a public building on site. The public building was established in 1923 with subsequent miscellaneous buildings/structures added in 1996. Building permit and zoning requirements were first in place over the properties in 1955; therefore, the establishing the

main public building would not have required building permits. However, the miscellaneous buildings/structures would have required building permits.

- i. DR 91-04-01: Reviewed Exterior modifications to the exterior courtyard
- ii. NSA 3-94: Review of a new elementary school
- iii. NSA 1-95: Construction of playfields and parking areas
- iv. NSA 28-96: Construction of a 20' x 20' restroom and a concession stand
- v. T1-08-060: Grading permit to replace bleachers at the play fields
- vi. T1-08-061: Lot consolidation of all school properties into one parcel. This was required as a condition of approval, but it appears as if it was not fully executed by County Assessment. T2-08-002: Additional entrance into grade school parking area
- vii. T2-08-074: Replace wooden bleachers at the playfields
- viii. T3-2013-2703: Increase student population and construct a looped bus turnaround
- Below is a list of the following building permit cards for the properties.
 - i. Building Permit 51369 – 06/17/1970 – Interior Remodel
 - ii. Building Permit 51699 – 07/29/1970 – Trailers for Temp Classrooms
 - iii. Building Permit 52524 – 11/12/1970 – New Construction of Classrooms
 - iv. Building Permit 52525 – 11/12/1970 – Addition to School
 - v. Building Permit 57595 – 08/17/1972 – Temporary Trailer
 - vi. Building Permit 751443 – 08/22/1975 – Bus garage
 - vii. Building Permit 760588 – Chain Link Fence
 - viii. Building Permit 771150 – Addition to School
 - ix. Building Permit 800553 – 03/19/1980 – Alteration to School
 - x. Building Permit 810164 – 01/26/1981 – Alteration to Middle School
 - xi. Building Permit 811994 – 10/06/1981 – Alteration to School
 - xii. Building Permit 812203 – 10/28/1981 – Temporary Classroom that expired on 01/30/1982
 - xiii. Building Permit 812230 – 10/30/1981 – Alteration to High School
 - xiv. Building Permit 812329 – 11/13/1981 – Alteration to High School Gym
 - xv. Building Permit 820842 – 06/25/1982 – Install Grease Pit in Maintenance Garage
 - xvi. Building Permit – 04/28/1988 – Interior and Exterior Alterations
 - xvii. Building Permit – 04/20/1990 – Remodel/Structural Work in Attic
 - xviii. Building Permit – 03/29/1991 – Interior and Exterior Remodel, add Patio and Handicap Ramp
 - xix. Building Permit – 04/28/1992 – Addition of Footing Cairns and Brick Pavers
 - xx. Building Permit – 02/11/1997 – Accessory Structure on 725 NE Evans Road
 - xxi. Building Permit – 06/27/2000 – Monument Sign

3.00 Code Compliance and Applications Criteria:

3.1 § 38.0560 CODE COMPLIANCE AND APPLICATIONS.

Except as provided in subsection (A), the County shall not make a land use decision approving development, including land divisions and property line adjustments, or issue a building permit for any property that is not in full compliance with all applicable provisions of the Multnomah County Land Use Code and/or any permit approvals previously issued by the County.

(A) A permit or other approval, including building permit applications, may be authorized if:

(1) It results in the property coming into full compliance with all applicable provisions of the Multnomah County Code. This includes sequencing of permits or other approvals as part of a voluntary compliance agreement; or

(2) It is necessary to protect public safety; or

(3) It is for work related to and within a valid easement over, on or under an affected property.

(B) For the purposes of this section, Public Safety means the actions authorized by the permit would cause abatement of conditions found to exist on the property that endanger the life, health, personal property, or safety of the residents or public. Examples of that situation include but are not limited to issuance of permits to replace faulty electrical wiring; repair or install furnace equipment; roof repairs; replace or repair compromised utility infrastructure for water, sewer, fuel, or power; and actions necessary to stop earth slope failures.

Staff: There are no open compliance cases associated with the property. Pursuant to MCC 38.0560 properties must be parcels (lawfully established properties) in order to be eligible for approval for any proposed development. *Criterion met.*

4.00 Columbia Gorge Rural Center Zoning District:

MCC 38.0030 EXISTING USES AND DISCONTINUED USES

(A) **Right to Continue Existing Uses and Structures:** Any existing use or structure may continue so long as it is used in the same manner and for the same purpose, except as otherwise provided.

(B) **Replacement of Existing Structures Not Damaged or Destroyed by Disaster:** Except as provided in (C) below, an existing structure may be replaced if a complete land use application for a replacement structure is submitted to the reviewing agency within one year of the date the use of the original structure was discontinued. The replacement structure shall comply with the following standards:

(1) The replacement structure shall be used in the same manner and for the same purpose as the original structure.

Staff: The applicant has submitted a land use application for a seismic retrofit to the existing gymnasium building. The applicant has indicated that the existing gymnasium has been in continuous use up to the time the complete application was submitted on September 20, 2018. The proposed retrofit of the gymnasium structure is meant to be used in the same manner and purposed as the existing gymnasium. The gymnasium will provide a seismically sound structure as compared to the existing gymnasium, but otherwise is meant to provide the same function and use. The existing structure has not been destroyed or damaged by a disaster, fire, or flood. The criteria under subsection B.1. do not apply.

(2) The replacement structure may have a different size and/or location than the original structure. An existing mobile home may be replaced with a framed residence and an existing framed residence may be replaced with a mobile home.

Staff: The proposed retrofit is proposed in the same location as the existing gymnasium. Changes to the exterior are required to bring the gymnasium into seismic compliance and to eliminate the fall hazard associated with the non-structural glass block clerestories and brick wing walls. The retrofit to the gymnasium is proposed with no changes to the size or location of the existing gymnasium. The existing structure has not been destroyed or damaged by a disaster, fire, or flood. The criteria under subsection B.2. do not apply.

(3) The replacement structure shall be subject to the scenic, cultural, recreation and natural resources provisions; the treaty rights provisions; and the land use designations provisions involving agricultural buffer zones, approval criteria for fire protection, and approval criteria for siting of dwellings on forest land.

Staff: The existing structure has not been destroyed or damaged by a disaster, fire, or flood. The criteria under subsection B.3. do not apply.

(4) The use of the original structure shall be considered discontinued if a complete land use application for a replacement structure is not submitted within the one year time frame.

Staff: According to the applicant, the gymnasium building is currently in use and there has been no discontinuance of use. The building is a gymnasium with various support spaces including locker rooms, coaches' offices, restrooms, and weight rooms. A science wing was added in 1960. The building's uses are to remain the same. The complete application for the stadium was received on September 20, 2018. This application has been submitted and there has been no lapse in use of the gymnasium. The criterion is met. The existing structure has not been destroyed or damaged by a disaster, fire, or flood. The criteria under subsection B.4. do not apply.

(C) Replacement of Existing Structures Damaged or Destroyed by Disaster: An existing structure damaged or destroyed by fire, flood, landslide or other similar disaster may be replaced if a complete land use application for a replacement structure is submitted to the reviewing agency within two years of the date the original structure was damaged or destroyed. The replacement structure shall comply with the following standards...

Staff: The existing structure has not been destroyed or damaged by a disaster, fire, or flood. The criteria under subsection C. do not apply.

(D) Changes to Existing Uses and Structures: Except as otherwise provided, any change to an existing use or modification to the exterior of an existing structure shall be subject to review and approval pursuant to this Management Plan.

Staff: The applicant has submitted plans to retrofit the building at the location of existing gymnasium located on the campus of Corbett High School (Exhibits A.3) and has demonstrated that existing gymnasium has been in place since at least 1981 and have been continuously used since that time (Exhibits A.2). The seismic retrofit to the gymnasium building is allowed as a Review Use in the National Scenic Area. This action is considered to be a change to an existing use. Therefore, the action is subject to a NSA Site Review which is a Type II review. As required by MCC 38.0030(D), any change to an existing use or modification to the exterior of an existing structure shall be subject to review and approval pursuant to the Existing Uses provisions which state that uses and structures lawfully established prior to

1986 may continue in the same manner. The old elementary school, used for the middle and high schools is a historic building established in the 1920's, prior to any zoning or building permit requirements. There is a substantial permitting history of the school buildings from the 1970's through the 1990's including additions, remodels, new structures etc. Staff has determined that the school buildings and structures have been lawfully established.

According to submitted application and County records, there are three schools on the subject property. The elementary school was reviewed under the National Scenic Area standards in 1994. It included a new building and was approved for 425 students. The high school and middle school then utilized the old elementary school building. The play fields on the property have been reviewed by the county as have the stand alone restrooms and concession stands. The parking and pedestrian improvements have been reviewed through a previous design review application. Application T3-2013-2703 retroactively reviewed the student population and allowed additional students based on growth projections. The manner and purpose of the use has been and is currently as a cluster of schools. The buildings and use were lawfully established and therefore can continue to be used for a school and be modified as described above.

(E) Discontinuance of Existing Uses and Structures: Except as provided in (C) and (C)(6) above, any use or structure that is discontinued for one (1) year or more shall not be considered an existing use or structure. Proof of intent to abandon is not required to determine that an existing use or use of an existing structure has been discontinued.

(1) Multiple Uses: An existing use or structure with more than one legally established use may discontinue one of the uses without discontinuing the others.

(2) Change in Use: An existing use or structure shall become discontinued if the use or use of the structure changes.

Staff: The existing gymnasium has been used continuously since it was upgraded in 1981. The existing use and structure was shown on the approved site plan for the proposed expansion of the campus ball fields in 1995 and have been in place since that time. The use of the gymnasium will remain the same and the proposal will provide the seismic upgrade to the gymnasium. *Criterion met.*

(F) Discontinued Uses and Structures: Reestablishment or replacement of any use or structure that has been discontinued shall be subject to all applicable policies and guidelines in the Management Plan, including, but not limited to, guidelines for land use designations and scenic, cultural, recreation and natural re-sources.

Staff: The applicant has demonstrated that the use (gymnasium) has not been discontinued. Subsection F is not applicable to this review.

MCC 38.2460 DIMENSIONAL REQUIREMENTS

(A) The minimum lot size for a single family dwelling shall be one acre.

(B) The minimum lot size for a duplex dwelling shall be two acres.

(C) The minimum lot size for a conditional use permitted pursuant to MCC 38.2430, shall be based upon:

(1) The site size needs of the proposed use;

(2) The nature of the proposed use in relation to the impacts on nearby properties; and

(3) Consideration of the purposes of this district.

(D) That portion of a street which would accrue to an adjacent lot if the street were vacated shall be included in calculating the area of such lot.

(E) Minimum Yard Dimensions – Feet

Front	Side	Street Side	Rear
30	10	30	30

Maximum Structure Height – 35 feet

Minimum Front Lot Line Length – 50 feet.

(F) The minimum yard requirement shall be increased where the yard abuts a street having insufficient right-of-way width to serve the area. The Planning Commission shall determine the necessary right-of-way widths and additional yard requirements not otherwise established by ordinance.

(G) Structures such as barns, silos, windmills, antennae, chimneys, or similar structures may exceed the height requirement if located at least 30 feet from any property line.

Staff: The existing schools are currently located on a 36.24 acre parcel. Setbacks are not applicable since no buildings are proposed as part of the application and because 1) At more than 36-acres, the subject property is of adequate size to have three schools located on the parcel; 2) the nature of the proposed use and impacts on properties is compatible with the neighborhood and tends to be an anchor to downtown Corbett; 3) The manner and purpose of the use has been and is currently as a cluster of schools. Staff finds the intensity and scope of the elementary, middle and high school population which was reviewed in 2013 provided for a maximum student enrollment of all three schools to be 1,382, allowing some flexibility for future enrollment increases. The schools are located on the Historic Columbia River Highway which is under the jurisdiction of the State of Oregon and right-of-way widths are subject to state requirements. ODOT has been notified of the application and has not requested any increases for right-of-way widening. *Criteria met.*

C. MCC 38.2490 ACCESS

Any lot in this district shall abut a street or shall have other access determined by the approval authority to be safe and convenient for pedestrians and passenger and emergency vehicles.

Staff: The property has existing access points from the Historic Columbia River Highway. The Highway is under the jurisdiction of ODOT. *Criterion met.*

5.00 National Scenic Area Site review:

MCC 38.7035 GMA SCENIC REVIEW CRITERIA

The following scenic review standards shall apply to all Review and Conditional Uses in the General Management Area of the Columbia River Gorge National Scenic Area:

(A) All Review Uses and Conditional Uses:

- (1) New buildings and roads shall be sited and designed to retain the existing topography and to minimize grading activities to the maximum extent practicable.**

Staff: No new buildings or roads are proposed as part of the application. The proposed work is to retrofit the existing gymnasium building for structural safety impacts. Three exterior sides of the gymnasium will be modified but there is no grading activity proposed. *Criterion met.*

- (2) New buildings shall be compatible with the general scale (height, dimensions and visible mass) of similar buildings that exist nearby (e.g. dwellings to dwellings). Expansion of existing development shall comply with this guideline to the maximum extent practicable. For purposes of applying this standard, the term nearby generally means buildings within ¼ mile of the parcel on which development is proposed.**

Staff: No new buildings are proposed. *Criterion not applicable.*

- (3) New vehicular access points to the Scenic Travel Corridors shall be limited to the maximum extent practicable, and access consolidation required where feasible.**

Staff: The Historic Columbia River Highway is a scenic travel corridor. No new vehicular access points are proposed as part of the application. *Criterion not applicable.*

- (4) Property owners shall be responsible for the proper maintenance and survival of any required vegetation.**

Staff: Vegetation is not required with this application as exterior changes to the structures are not proposed. The approval of this application will not be conditioned to require screening vegetation of other plantings. *Criterion not applicable.*

- (5) For all proposed development, the determination of compatibility with the landscape setting shall be based on information submitted in the site plan.**

Staff: The applicant has provided the necessary information to determine compatibility with the Village Landscape setting. While there are no new buildings proposed, there is new development in the form of retrofitting the building on the site which is what we are reviewing. Please see staff findings under MCC 38.7035 (C) below. *Criterion met.*

(B) All Review Uses and Conditional Uses topographically visible from Key Viewing Areas:

- (1) **Each development shall be visually subordinate to its setting as seen from Key Viewing Areas.**

Applicant: The Gymnasium is an existing building. The seismic upgrades will not change the height or location of the building.

Staff: While there are no new buildings proposed, there is new development in the form of retrofitting the building on the site which is what we are reviewing. There are no new buildings or structures proposed. The changes to the exterior of the building will mimic the existing building material as far as dark wood siding and matching the existing brick. Visual subordination is not applicable to this review per GMA Scenic Review Criteria (C) (6) Village (a) New Development in this setting is exempt from the color and siting requirements of MCC 38.7035 (B). *Criterion not applicable*

- (2) **The extent and type of conditions applied to a proposed development or use to achieve the scenic standard shall be proportionate to its potential visual impacts as seen from Key Viewing Areas. Decisions shall include written findings addressing the factors influencing potential visual impact including but not limited to: the amount of area of the building site exposed to Key Viewing Areas, the degree of existing vegetation providing screening, the distance from the building site to the Key Viewing Areas it is visible from, the number of Key Viewing Areas it is visible from, and the linear distance along the Key Viewing Areas from which the building site is visible (for linear Key Viewing Areas, such as roads). Conditions may be applied to various elements of proposed developments to ensure they are visually subordinate to their setting as seen from key viewing areas, including but not limited to siting (location of development on the subject property, building orientation, and other elements); retention of existing vegetation; design (color, reflectivity, size, shape, height, architectural and design details and other elements); and new landscaping.**

Staff: As stated in B.1 above, the proposed alterations to the gymnasium is being reviewed as new development which is exempt from visual subordination requirements as it is located in the village setting. The changes to the exterior of the gymnasium building consists of replacement of wall segments on the east, west, and north side. The walls will be replaced with wood material that match the color and look of the existing building. The east and west sides of the building have existing glass blocks that will be removed and replaced with wood siding that matches the rest of the building. The north side of the building is visible from the Historic Columbia River Highway, at the main entrance, there are two existing brick wing walls. The two brick wing walls will be replaced with a brick that has structural stability that does not change the appearance of the walls. The proposed seismic upgrade causes a modification to the exterior of the building as far as removal of glass block along the gymnasium building and replacing it with wood siding to match the building. Staff finds that visual subordination is not applicable as stated above. *Criterion met.*

- (3) **Determination of potential visual effects and compliance with visual subordination policies shall include consideration of the cumulative effects of proposed developments.**

Staff: Since visual subordination is not required, the cumulative effects is not applicable to the proposal. The changes to the exterior of the gymnasium building consists of

replacement of wall segments on the east, west, and north side and replacement of two brick wing walls with brick walls that have structural stability. Staff has considered the cumulative effects of proposed developments and due to the nature of the submitted drawings and proposal, staff finds the replacement components will blend in with the natural environment as seen from the Old Highway. The proposed changes to the exterior of the gymnasium do not have cumulative impacts because the changes blend in with the other buildings and look of the existing gymnasium. The proposed building retrofit which is in the Village Landscape is exempt from the color and siting requirements of MCC 38.7035 (B). *Criterion not applicable.*

- (4) **In addition to the site plan requirements in MCC 38.0045 (A), applications for all buildings visible from key viewing areas shall include a description of the proposed building(s)' height, shape, color, exterior building materials, exterior lighting, and landscaping details (type of plants used; number, size, locations of plantings; and any irrigation provisions or other measures to ensure the survival of landscaping planted for screening purposes).**

Staff: The application is to retrofit to the gymnasium building of the Corbett School which is visible from key viewing areas. The application does include a description of the proposed building(s)' height, shape, color, and exterior building materials in Exhibit A.7. The proposed project includes seismic upgrades to the gymnasium building. The changes to the exterior of the gymnasium building consists of replacement of wall segments on the east, west, and north side. The walls will be replaced with wood material that match the color and look of the existing building. The east and west sides of the building have existing glass blocks that will be removed and replaced with wood siding that matches the rest of the building. The north side of the building is visible from the Old Highway, at the main entrance, there are two existing brick wing walls. The two brick wing walls will be replaced with a brick that has structural stability that does not change the appearance of the walls. *Criterion met.*

- (5) **New development shall be sited on portions of the subject property which minimize visibility from Key Viewing Areas, unless the siting would place such development in a buffer specified for protection of wetlands, riparian corridors, sensitive plants, sensitive wildlife sites or conflict with the protection of cultural resources. In such situations, development shall comply with this standard to the maximum extent practicable.**

Staff: The proposed development is not changing the location/siting of the building; it is a seismic retrofit to an existing structure. As stated previously, the proposal is exempt from visual subordination requirements as it is located in the Village setting. There are no wetlands, riparian corridors, sensitive plants, sensitive wildlife sites or conflict with the protection of cultural resources on site. The proposed development is necessary where it is proposed in order to complete safety improvements to the existing structure. *Criterion not applicable.*

- (6) **New development shall be sited using existing topography and/or existing vegetation as needed to achieve visual subordination from key viewing areas.**

Staff: No new structures or buildings are proposed. The modifications are to the existing gymnasium that is a lawfully existing use. Because the building exists; it is not proposed to

be sited differently to further achieve visual subordination. Due to the location of the school in the village setting, it is exempt from visual subordination requirements. *Criterion not applicable.*

- (7) **Existing tree cover screening proposed development from key viewing areas shall be retained as specified in MCC 38.7035(C).**

Staff: No trees are proposed to be removed. *Criterion met.*

- (8) **Driveways and buildings shall be designed and sited to minimize visibility of cut banks and fill slopes from Key Viewing Areas.**

Staff: Not applicable. The building and driveways are existing. There is no proposed grading activity as a part of this application. *Criterion met.*

- (9) **The exterior of buildings on lands seen from Key Viewing Areas shall be composed of nonreflective materials or materials with low reflectivity, unless the structure would be fully screened from all Key Viewing Areas by existing topographic features. The Scenic Resources Implementation Handbook includes a list of recommended exterior materials. These recommended materials and other materials may be deemed consistent with this code, including those that meet recommended thresholds in the “visibility and Reflectivity Matrices” in the Implementation Handbook. Continuous surfaces of glass unscreened from key viewing areas shall be limited to ensure visual subordination. Recommended square footage limitations for such surfaces are provided for guidance in the Implementation Hand-book.**

Staff: The existing brick wing walls on the elevation facing the Key Viewing Area will be replicated and are built of non-reflective material. The glass block clerestories are not visible from the highway; however, they will be replaced with wood siding that matches the wood used on the front elevation which will be non-reflective compared to having the glass blocks. The glass block clerestories visible on the exterior of the original gym building are perpendicular to the highway. Changes to the gymnasium building as far as removal of the glass block clerestories will not be visible from the highway. The proposed retrofit utilizes materials that reinforce the Village Setting Character by utilizing wood which will replace the glass block. *Criterion met.*

- (10) **Exterior lighting shall be directed downward and sited, hooded and shielded such that it is not highly visible from Key Viewing Areas. Shielding and hooding materials shall be composed of non-reflective, opaque materials.**

Staff: No new exterior lights are proposed. *Criterion met.*

- (11) **Unless expressly exempted by other provisions in this chapter, colors of structures on sites visible from key viewing areas shall be dark earth tones found at the specific site or in the surrounding landscape. The specific colors or list of acceptable colors shall be included as a condition of approval. The Scenic Resources Implementation Handbook will include a recommended palette of colors.**

Staff: The building colors are exempt per 38.7035(C)(6)Village(a). *Criterion met.*

- (12) **Additions to existing buildings smaller in total square area than the existing building may be the same color as the existing building. Additions larger than the existing building shall be of dark earth-tone colors found at the specific site or in the surrounding landscape. The specific colors or list of acceptable colors shall be included as a condition of approval. The Scenic Resources Implementation Handbook will include a recommended palette of colors.**

Staff: There are no additions to the existing building. There are seismic upgrades to three exterior walls which will match the existing wall color but the requirement for specific color is exempt. *Criterion met.*

- (13) **Rehabilitation of or modifications to existing significant historic structures shall be exempted from visual subordination requirements for lands seen from Key Viewing Areas. To be eligible for such exemption, the structure must be included in, or eligible for inclusion in, the National Register of Historic Places or be in the process of applying for a determination of significance pursuant to such regulations. Rehabilitation of or modifications to such historic structures shall be consistent with National Park Service regulations for historic structures.**

Staff: The Corbett School is not included nor eligible for the National Register of Historic Places. The proposed modifications to the gymnasium are exempted from Visual subordination requirements because they do not apply in the Village landscape setting. *Criterion met.*

- (14) **The silhouette of new buildings shall remain below the skyline of a bluff, cliff or ridge as seen from Key Viewing Areas. Variances may be granted if application of this standard would leave the owner without a reasonable economic use. The variance shall be the minimum necessary to allow the use, and may be applied only after all reasonable efforts to modify the design, building height, and site to comply with the standard have been made.**

Staff: The silhouette of the proposed structure remains below the skyline of a bluff, cliff or ridge as seen from key viewing areas. *Criterion met.*

- (15) **An alteration to a building built prior to November 17, 1986, which already protrudes above the skyline of a bluff, cliff or ridge as seen from a Key Viewing Areas, may itself protrude above the skyline if:**

Staff: The existing building does not protrude nor do the proposed alterations protrude above the skyline of a bluff, cliff or ridge as seen from the Historic Columbia River Highway. *Criterion met.*

- (16) **The following standards shall apply to new landscaping used to screen development from key viewing areas:**

(a) New landscaping (including new earth berms) shall be required only when there is no other means to make the development visually subordinate from key viewing areas. Alternate sites shall be considered prior to using new landscaping to achieve visual subordination. Development shall be sited to avoid the need for new landscaping wherever possible.

(b) If new landscaping is required, it shall be used to supplement other techniques for achieving visual subordination.

(c) Vegetation planted for screening purposes shall be of sufficient size to make the development visually subordinate within five years or less of commencement of construction.

(d) Landscaping shall be installed as soon as practicable, and prior to project completion. Applicant. The property owner(s), and their successor(s) in interest are responsible for the proper maintenance and survival of planted vegetation, and replacement of such vegetation that does not survive.

(e) The Scenic Resources Implementation Handbook includes recommended species for each landscape setting consistent with MCC 38.7035(C) and the minimum recommended sizes for tree plantings (based on average growth rates expected for recommended species).

Applicant: New structures, additional parking, or access points to the site are not proposed. The existing gymnasium is not being expanded. All existing landscaping is to remain.

Staff: No new landscaping is proposed or required. *Criterion met.*

- (17) Conditions regarding new landscaping or retention of existing vegetation for new developments on land designated GMA Forest shall meet both scenic guidelines and the fuel break requirements of MCC 38.7305(A).**

Staff: The subject property is not designated GMA Forest. *Criterion not applicable.*

- (18) New main lines on lands visible from Key Viewing Areas for the transmission of electricity, gas, oil, other fuels, or communications, except for connections to individual users or small clusters of individual users, shall be built in existing transmission corridors unless it can be demonstrated that use of existing corridors is not practicable. Such new lines shall be underground as a first preference unless it can be demonstrated to be impracticable.**

Staff: No new utility lines are proposed or required as part of the application. *Criterion not applicable.*

- (19) New buildings shall not be permitted on lands visible from Key Viewing Areas with slopes in excess of 30 percent. A variance may be authorized if the property would be rendered unbuildable through the application of this standard. In determining the slope, the average percent slope of the proposed building site shall be utilized.**

Staff: The subject site has slopes less than 30% and no new buildings are proposed. *Criterion not applicable.*

- (20) All proposed structural development involving more than 100 cubic yards of grading on sites visible from Key Viewing Areas shall include submittal of a grading plan.**

This plan shall be reviewed by the Planning Director for compliance with Key Viewing Area policies. The grading plan shall include the following:

Staff: No new buildings are proposed so no structural development will require more than 100 cubic yards of grading on site. *Criterion not applicable.*

(C) All Review Uses and Conditional Uses within the following landscape settings, regardless of visibility from KVAs:

(6) Village

- (a) New development in this setting is exempt from the color and siting requirements of MCC 38.7035(B).**

Staff: The proposed modifications to the gymnasium is within the Village landscape setting which is exempted from color and siting requirements. While the proposed exterior changes are exempt, the applicant will adhere to color requirements as they intend to use dark wood boards to match existing siding. *Criterion met.*

- (b) New commercial buildings shall be limited in size to a total floor area of 5,000 square feet or less, and shall be limited in height to 2 and 1/2 stories or less.**

Staff: No commercial buildings are proposed. *Criterion not applicable.*

- (c) For new commercial, institutional (churches, schools, government buildings) or multi-family residential uses on parcels fronting a Scenic Travel Corridor (the Historic Columbia River Highway) and expansion of existing development for such uses, parking shall be limited to rear or side yards of buildings to the maximum extent practicable.**

Staff: The proposal is for the Corbett School District, an institutional use as listed, and fronts the Historic Columbia River Highway. However, existing buildings are not being expanded and new buildings are not proposed that would require additional parking. *Criterion met.*

- (d) New vehicular access points to the scenic travel corridors shall be limited to the maximum extent practicable, and access consolidation shall be required where feasible.**

Staff: No new access points onto the Historic Columbia River Highway are proposed. *Criterion not applicable.*

- (e) New development proposals and expansion of existing development shall be encouraged to follow planned unit development approaches, featuring consolidated access, commonly-shared landscaped open areas, etc.**

Staff: No new access points are proposed. No dwellings are located on site so none of the planned unit development approaches are appropriate. *Criterion met.*

- (f) **New commercial, institutional or multi-family residential uses fronting a Scenic Travel Corridor shall comply with the following landscape requirements:**

1. Parking or loading areas for 10 or more spaces shall include a landscaped strip at least 5 feet in width between the new use and the Scenic Travel Corridor roadway.

2. The landscape strip required in subsection (f) 1. above shall include shrubs, vegetative ground cover and, at minimum, one tree spaced as appropriate to the species and not to exceed 25 feet apart on the average.

Staff: The application does not include any new uses. *Criterion not applicable.*

- (g) **The use of building materials reinforcing the Village Setting's character, such as wood, logs or stone, and reflective of community desires, should be encouraged.**

Staff: No new buildings or structures are proposed but the exterior modifications will utilize wood siding (this will that replaces the glass blocks on the gymnasium building) that matches the rest of the gymnasium building and fits in with the overall school campus. The existing brick walls will be replaced with brick that is structurally sound. Building colors will be consistent with the palette areas utilized for the existing school buildings. *Criterion met.*

- (h) **Architectural styles characteristic of the area (such as 1½ story dormer roof styles in Corbett), and reflective of community desires, should be encouraged. Entry signs should be consistent with such architectural styles.**

Staff: The changes to the gymnasium are reflective of the community desire for structural safety of the gymnasium building. The retrofit to the gymnasium building does not affect the architectural style of the existing building because the changes to the exterior of the building are proposed with materials and a design that is consistent with the existing architecture of the building (See Exhibit A.7 and A.8). *Criterion met.*

- (i) **Design features which create a "pedestrian friendly" atmosphere, such as large shop windows on the ground floor of commercial buildings, porches along ground floors with street frontage, etc. should be encouraged.**

Staff: The seismic retrofit to the gymnasium does not affect the "pedestrian friendly" atmosphere of the structure as it is already located on the ground floor just to the east of the main school building and parking areas. . The changes to the building promotes increased safety as it will make the structure seismically sound and eliminate hazard concern by improving the brick wing walls and removing the glass block in the gymnasium which further make the site pedestrian friendly *Criterion met.*

- (j) **Pedestrian walkways and bicycle paths should be encouraged and integrated into new developments wherever feasible.**

Staff: The proposed development is to seismically upgrade the gymnasium building; which due to the nature of the changes does not impact the existing system of pedestrian paths throughout the campus. *Criterion met.*

- (k) **Where feasible, existing tree cover of species native to the region or commonly found in the area shall be retained when designing new development or expanding existing development.**

Staff: The proposed gymnasium retrofit does not require the removal of any vegetation. *Criterion met.*

- (l) **Compatible recreation uses may include community parks serving the recreation needs of local residents, and varying intensities of other recreation uses.**

Staff: The school fields are used by the community but there is no new development proposed for the athletic fields or property. *Criterion met.*

(D) All Review Uses and Conditional Uses within scenic travel corridors:

- (1) **For the purposes of implementing this section, the foreground of a Scenic Travel Corridor shall include those lands within one-quarter mile of the edge of pavement of the Historic Columbia River Highway and I- 84.**

Staff: The proposed is a review use and is within ¼ mile of the Historic Columbia River Highway.

- (2) **All new buildings and alterations to existing buildings, except in a GGRC, shall be set back at least 100 feet from the edge of pavement of the Scenic Travel Corridor roadway. A variance to this setback requirement may be granted pursuant to MCC 38.0065. All new parking lots and expansions of existing parking lots shall be set back at least 100 feet from the edge of pavement of the Scenic Travel Corridor roadway, to the maximum extent practicable.**

Staff: The proposed replacement is within the GGRC, but is also set back more than 100' from the roadway. No new parking lots are proposed. *Criteria met.*

- (3) **Additions to existing buildings or expansion of existing parking lots located within 100 feet of the edge of pavement of a Scenic Travel Corridor roadway except in a GGRC, shall comply with subsection (2) above to the maximum extent practicable.**

Staff: The proposed stadium would be located farther than 100' of the edge of pavement of the Historic Columbia River Highway.

- (4) **All proposed vegetation management projects in public rights-of-way to provide or improve views shall include the following:**

- (a) **An evaluation of potential visual impacts of the proposed project as seen from any Key Viewing Area;**
(b) **An inventory of any rare plants, sensitive wildlife habitat, wetlands or riparian areas on the project site. If such re-sources are determined to be present, the project shall comply with applicable standards to protect the resources.**

Staff: The proposal occurs in an area previously developed with the gymnasium building with the surrounding areas being maintained as parking lot. No rare plants are known to exist in the

development area. No additional vegetation management is proposed with this retrofit to the gymnasium building. There are no new structures, buildings, ground disturbance or other development proposed. The proposed seismic retrofit to gymnasium building is be located farther than 100' of the edge of pavement of the Historic Columbia River Highway. None of the Scenic Travel Corridor standards found in (D) (1) (2) (3) above are triggered. *Criterion met.*

6.00 Other GMA Review Criteria:

MCC 38.7045 - GMA Cultural Resource Review Criteria:

(A) The wetland review criteria shall be deemed satisfied if:

(1) The project site is not identified as a wetland on the National Wetlands Inventory (U.S. Fish and Wildlife Service, 1987);

MCC 38.7055 GMA Wetland Review Criteria

MCC 38.7060 GMA stream, lake, and riparian criteria

MCC 38.7065 GMA wildlife review criteria

MCC 38.7070 GMA rare plant review criteria

MCC 38.7080 GMA recreation resource review criteria

Applicant: The seismic upgrade to the gymnasium requires modifications to an existing structure. None of the upgrades will disturb the ground. Extensive grading was done when the building was built. No site work will be required to seismically upgrade the gymnasium. The existing services - water, sewage disposal, power and telephone poles and lines and outdoor lighting - will be unchanged. Regrading of the site is not required. The site does not have any water features. Wetlands will not be impacted.

Staff: Because the proposal does not include new structures, new buildings, ground disturbance or expansion of the school use into areas of land not already utilized as a school, the above review criteria are not triggered. Notice of the application has been sent to partner agencies and organizations to ensure the opportunity to comment, present evidence, and address any issues or concerns relating to cultural, historic, wildlife, recreation and habitat resources. No comments have been received regarding the above resources. The above resources have not been identified at the proposed development site. *Criteria met.*

7.00 Conclusion:

Based on the findings and other information provided herein, the applicant has carried the burden necessary for the NSA permit to seismically retrofit the Corbett gymnasium on the subject parcel. This approval is subject to the conditions of approval established in this report.

8.00 Exhibits:

'A' Applicant's Exhibits

'B' Staff Exhibits

Exhibits with a "*" after the exhibit # have been included as part of the mailed decision. All other exhibits are available for review in Case File T2-2018-10387 at the Land Use Planning office.

Exhibit #	# of	Description of Exhibit	Date Received/
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Pages			Submitted
A.1	1	NSA Application Form	05/04/2018
A.2	15	Narrative	05/04/2018
A.3	1	Site Plan	05/04/2018
A.4	1	Floor Plan A1.1	05/04/2018
A.5	2	Statutory Warranty Deed recorded as Instrument #2009-066251 on 11 th Day of May 2009.	05/04/2018
A.6	3	Structural Drawings SO.01-SO.03	05/04/2018
A.7	2	Elevations, Section, Details	05/10/2018
A.8	3	Photos of the school and proposed retrofit	05/04/2018
'B'	#	Staff Exhibits	Date
B.2	1	Department of Assessment, Records, and Taxation (DART): Map for 1 North, R 4 East, Section 34, Tax Lot 100	
B.3	7	Pre-Filing Conference Summary Notes	06/01/2018
B.5	1	Aerial Photo from 1998	06/01/2018
B.6	1	Aerial Photo from 2002	06/01/2018
B.7	1	Aerial Photo from 2012	06/01/2018
'C'	#	Administration & Procedures	Date
C.1	2	Agency Review	05/16/2018
C.2	2	Agency Review with OR SHPO Submittal Form	05/16/2018
C.3	2	Incomplete Letter	06/07/2018
C.4	1	Complete Letter (Day 1)	10/16/2018
C.5	8	Opportunity to Comment & Mailing list	10/29/2018
C.6		Administrative Decision & Mailing list	
'D'	#	Comments Received	Date
D.1	4	Cultural Resource Survey Determination from Chris Donnermeyer, Heritage Program Resource Manager, Columbia River Gorge National Scenic Area	06/01/2018
D.2	1	Casey Gatz, Land Management Planner, Columbia River Gorge National Scenic Area Office	5/30/2018
D.3	1	Jessica Gabriel, Oregon Parks and Recreation Dept.	8/30/2018
D.4	7	Letter from Steven D. McCoy, Staff Attorney, Friends of the Columbia River Gorge commenting on the application	8/30/2018