As Amended (p. 49 E)

IN THE CITY COUNCIL OF THE CITY OF PORTLAND OREGON

IN THE MATTER OF AN APPLICATION BY CENTRAL CATHOLIC HIGH SCHOOL FOR A CONDITIONAL USE MASTER PLAN WITH ADJUSTMENTS AT 2401 SE STARK STREET (LU 11-115222 CU MS AD)

FINDINGS AND CONCLUSIONS

ADOPTED BY THE CITY COUNCIL ON OCTOBER 5, 2011

(APPROVAL OF A CONDITIONAL USE MASTER PLAN WITH ADJUSTMENTS)

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PORTLAND, OREGON

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BY CENTRAL CATHOLIC HIGH SCHOOL FOR A
CONDITIONAL USE MASTER PLAN WITH ADJUSTMENTS AT 2401 SE STARK STREET
LU 11-115222 CU MS AD

FINDINGS AND CONCLUSIONS

The findings and conclusions of the City Council in this matter are set forth below.

I. GENERAL INFORMATION

File No.:	LU 11-115222 CU MS AD (HO 4110011)
Applicant:	John Harrington, President Central Catholic High School 2401 SE Stark Street Portland, OR 97214
Applicant's Representatives:	Abby Dacey Boora Architects 720 SW Washington Street, Suite 800 Portland OR 97205
Appellant	Susan Lindsay, Chair Buckman Community Association c/o SEUL 3535 SE Main Street Portland, OR 97214
Site Address:	2401 SE Stark Street
Legal Description:	BLOCK 1 LOT 1, DALTONS ADD; BLOCK 1 LOT 10, DALTONS ADD; TL 10600 5.35 ACRES, SECTION 36 1N 1E
Tax Account No.:	R194900010, R194900100, R941360270
State ID No.:	1N1E35DD 19700, 1N1E35DD 14700, 1N1E36CC 10600
Quarter Section:	3032
Neighborhood:	Buckman, contact Susan Lindsay at 503-725-8257
Business District:	East Burnside Business Association, contact Judy Craine at 503-234-2514
District Coalition:	Southeast Uplift, contact Leah Hyman at 503-232-0010
Zoning:	R5 Single-Dwelling Residential 5,000
Plan District:	None

Land Use Review: Conditional Use Master Plan with Adjustments (CU MS AD)
Procedure: Type III, with a public hearing before the Hearings Officer. The decision of the Hearings Officer can be appealed to City Council.

II. INTRODUCTION AND PROCEDURAL HISTORY

Proposal
Central Catholic High School requests approval of a Type III Conditional Use Master Plan to expand and renovate their existing facility. The proposal will add a total of 48,000 square feet of floor area, and renovate approximately 47,000 square feet of the existing building in three separate phases:

Phase I
- 29,000 square foot, three-story addition on the east side of the existing courtyard; one of the stories will be below-grade.
- 15-space parking lot located at the northwest corner of SE Stark Street and SE 24th Avenue.

Phase II
- Interior remodel of East and North Wings.
- 2,000 square foot, second-story addition over a portion of the east wing, fronting SE Stark Street.
- A one-story, back-stage addition (approximately 600 square feet) at the east end of the East Wing.
- Rebuild the Oak Street entrance façade on the North Wing.

Phase III
- 17,000 square foot, second story addition over portions of the North and East Wings, near the intersection of SE Stark Street and SE 24th Avenue.

The additions, in combination with interior renovations of existing space, are intended to provide both learning and support space, and bring the school up to modern high school standards. The changes will accommodate such facilities as larger classrooms, new language labs, larger visual arts spaces, larger band and choir room, a multi-purpose commons space, an academic support center, reconfigured administrative offices, and a student counseling center. As some of these facilities will replace existing classrooms, the changes will result in a net increase of only one classroom, with the student enrollment maintained at the current 800-850 level.

Improvements to adjacent streets are also proposed, including a four foot widening of the SE 24th Avenue roadway (between SE Stark and SE Pine Streets), and curb extensions to facilitate pedestrian crossings at SE Stark Street and SE 26th Avenue, and SE Stark Street and SE 24th Avenue.

The applicant has provided a listing of existing activities and special events that occur at the high school, and indicated there will be no increase in the number of events, or the type of events, that occur on-campus.

The proposal will require the following Adjustments:

- increase the maximum allowed floor area ratio on the site from 0.56:1 to 0.68:1;
- reduce the minimum building setback for the second story addition on SE Stark Street from 12 feet to 0 feet (replicating the existing setback of the first story);

- reduce the minimum building setback along SE 24th Street from 15 feet to 6 feet, 6 inches for portions of the existing building walls along this frontage; with the exception of a modified trash enclosure proposed along this frontage, the reduced setback is not the result of new construction but the result of widening SE 24th Avenue, which will move the property line seven feet closer to the existing building walls;
- reduce the depth of the minimum required landscaped buffer along SE 24th Avenue from 15 feet to 6 feet, 6 inches resulting from the widening of SE 24th Avenue; and
- reduce the minimum landscaped area (for the entire site) from 10 percent to 8.5 percent.

Relevant Approval Criteria
In order to be approved, this proposal must comply with the approval criteria of Title 33, Portland Zoning Code. The applicable approval criteria are:

- 33.820.050, Conditional Use Master Plan Review;
- 33.815.105, Institutional and Other Uses in R Zones; and
- 33.805.040, Adjustment Approval Criteria.

Procedural History

- On June 6, 2011, a public hearing before the Hearings Officer was opened in the 3rd floor hearing room, 1900 SW 4th Avenue, Portland, Oregon, and was closed the same day. The record was held open until June 13, 2011, for new written evidence; until June 20, 2011, for parties to respond; and until June 27, 2011, for applicant's final rebuttal. The Hearings Officer's record was closed on June 27, 2011.
- On July 14, the Hearings Officer issued a decision (Exhibit I.2) approving the Conditional Use Master, and the four requested Adjustments. Both approvals were subject to conformance with the approved site plans (Exhibit C.2); conformance with the building elevations (Exhibit C.3); and conformance with Conditions A through L.
- The Hearings Officer's decision was appealed by the Buckman Community Association on July 28, 2011 (Exhibit I.1). The appellant identified three major objections to the Hearings Officer's approval of the application. In summary, these included:
  - Conditions of Approval and Enforcement. It is not clear how violations of past or proposed conditions of approval will be enforced, or how neighbors are to report such violations.
  - Impact of New Parking Lot and Building Additions on Residential Character. The proposed 15-space parking lot at SE 24th Avenue between SE Stark and SE Oak Streets, in combination with the increased building height and reduced building setback, will have a profoundly negative impact on the residential character of the neighborhood.
  - Impact of New Parking Lot on Livability. Proposing the 15-space parking lot, which will accommodate bus parking during after school hours, on a residential block will adversely impact livability by increasing noise, litter, and light glare.
- On August 8, 2011, the Bureau of Development Services sent notice of a City Council Hearing to be held, September 15, 2011 (Exhibit I.3); on September 8, a letter was submitted from the Buckman Community Association requesting the City Council hearing be postponed as many appellant representatives and affected neighbors would not be available (Exhibit I.6); on September 12, 2011, e-mails were received from the applicant's representatives objecting to the request to postpone the hearing (Exhibits I.9 and I.11).

- On September 15, 2011, the City Council convened at the City Council Chambers to consider an appeal of the Hearings Officer's decision; prior to the opening of the public hearing, a statement was read by the City Clerk, with supplemental information provided by the City Attorney, regarding the appellant's request to postpone the hearing, and the applicant's opposition to the postponement; the appellant stated at this time they wished to withdraw the request to postpone the public hearing; consistent with the appellant's request, the City Council then opened the appeal hearing.
- After considering evidence already in the record and testimony received at the public hearing, the City Council found that with two exceptions identified below, the applicable approval criteria for the proposed Conditional Use Master Plan with Adjustments, as detailed in the Hearings Officer's decision, have been met:
  - Use of Three Central Catholic Owned Properties Outside Master Plan Boundaries: Testimony was provided about the applicant's earlier request to potentially use the three properties they owned west of the proposed parking lot for future school use; these properties are legally described as Daltons Add, Block 1, Lot 2; Daltons Add, Block 1, Lot 3; and Daltons Add, Block 1, Lot 9. The appellant viewed the future use of these properties as a further incursion into the adjacent residential neighborhood. The applicant indicated the Conditional Use Master Plan application had since been amended to remove any reference to future use of these three properties. Furthermore, the applicant volunteered a condition of approval that prior to issuance of a building permit for any project approved under this Master Plan, the school will record a restrictive covenant that prohibits these three properties from being used for any use other than primary and accessory uses that are "allowed" or "limited" in the R5 zone, as provided in PCC 33.110.100(A), PCC 33.110.100(B), PCC 33.110.110 and Table 110-1 (including future amendments). The City shall be the beneficiary of the covenant, the covenant shall run with the land, and the covenant shall comply with PCC 33.700.060. The City Council finds that placing a condition on the approval on the requested Conditional Use Master Plan that requires such a covenant be recorded will provide assurance to the neighbors that there will be no future school use on these three properties;
  - Securing the New 15-Space Parking Lot After Hours: Testimony was provided about the potential impacts the new parking lot at the northwest corner of SE Stark Street and SE 24th Avenue may have on livability for the surrounding residential neighborhood. While the City Council concurs with the conclusions made in the Hearings Officer's decision that the parking lot will not have significant adverse impacts on the adjacent neighborhood, the City Council wants assurance that the parking lot will be secured after-hours. To address this concern, the City Council finds a condition of approval is necessary that states the parking lot shall be secured from 11 pm until 6 am. If Central Catholic High School needs the parking lot during those hours, the lot shall be secured immediately following Central Catholic's use of the lot
- The City Council made a motion to deny the appeal and approve the requested Conditional Use Master Plan with four Adjustments, with the conditions included in the Hearings Officer's decision, and the addition of the two new conditions identified above. A tentative vote to approve the motion passed by a 4-0 vote of the City Council.
- On October 5, 2011, the City Council reconvened and adopted Findings and Conclusion that denied the appeal, and approved the Conditional Use Master Plan with four Adjustments, with the conditions included in the Hearings Officer's decision, and the addition of the two new conditions identified above.

III. ANALYSIS

Site and Vicinity: The site, approximately 5.35 acres in size, encompasses a full city block bounded by SE Stark Street, SE 24th Avenue, SE Pine Street, and SE 26th Avenue. CCHS also owns five tax lots, totaling approximately 23,989 square feet in area, on the west side of SE 24th Avenue between SE Stark Street and SE Oak Street. Two of these lots, adjacent to SE 24th Avenue, are proposed to be included in an expanded Conditional Use Master Plan boundary and developed with a 15-space parking lot for use by the school. These two lots have been vacant for more than 25 years.

CCHS has operated a private high school at the full block site since 1939. The school is L-shaped and is located along the west and south property lines of the site (SE 24th Avenue and SE Stark Street), with the main entrance facing the corner. The existing building is predominantly one-story in height, with a partial basement that extends above grade along the site's SE 24th Avenue frontage. There is on-site parking for 17 cars, located to the east of the North and East Wings, which is accessed from SE 26th Avenue. The remainder of the full block is developed with an athletic field. On-site landscaping is largely limited to the building setback area along a portion of SE 24th Avenue, with smaller areas distributed throughout the site.

The adjacent streets have rights-of-way between approximately 46 to 66 feet in width, with improved roadways approximately 26 to 36 feet in width. All adjacent streets are improved with sidewalks. Southeast Stark is designated a Neighborhood Collector and Major City Walkway. The remaining adjacent streets are all designated Local Service Streets for all modes of transportation. The adjacent streets all have on-street parking, with some parking/loading limitations along portions of SE 24th Avenue, and along the north side of SE Stark Street just east of SE 24th Avenue. Additional on-street parking restrictions exist along the north side of SE Stark Street, east of SE 26th Avenue.

Lone Fir Cemetery, a 28 acre heavily treed property, is located immediately south of the CCHS campus, across SE Stark Street. The cemetery, which extends from SE 20th Avenue to SE 26th Avenue, does not appear to have on-site parking other than along the internal driveways, but there is street parking along most the site's four street frontages. With the exception of the cemetery, the remainder of the surrounding area, within a two-block radius of the CCHS site, is largely developed with single-dwelling residences, with a mixture of lower density, multi-dwelling development. Some of the single-dwelling residences in the area do not have off-street parking.

Zoning: The subject site is located in a Single-Dwelling Residential 5,000 (R5) zone. The single-dwelling zones primarily are intended to preserve land for housing and to provide housing opportunities for individual households. The use regulations are intended to create, maintain and promote single-dwelling neighborhoods. They allow for some non-household living uses but not to such an extent as to sacrifice the overall image and character of the single-dwelling neighborhood. The development standards work together to promote desirable residential areas by addressing aesthetically pleasing environments, safety, privacy, energy conservation, and recreational opportunities. The site development standards allow for flexibility of development while maintaining compatibility within the City's various neighborhoods.

The area immediately surrounding the site, north of SE Stark Street (within a two block radius) is largely mapped with Single Dwelling zoning. There is both R5 and R2.5 Single-Dwelling zoning east and west of the site, with R2.5 zoning north of the site. There are small areas of Commercial zoning along SE Ankeny Street at SE 26th Avenue

(CM), and along SE Stark Street at SE 20th Avenue and between SE 28th and SE 29th Avenues (CN1). The Lone Fir Cemetery site is located in an OS zone.

Land Use History: City records indicate several prior land use reviews. Recent decisions include:

- **LU 02-131397 CU AD:** Conditional Use Review with Adjustments to expand and renovate CCHS facilities. Approved subject to the following conditions:

  A. Building projects must remain substantially in the locations proposed on the site plan (Exhibit C.7).

  Status: This condition has been satisfied. The site plan is proposed to be further modified and is discussed below.

  B. The applicant shall maintain the 1987 Traffic and Parking Management Plan adopted by the applicant as part of the approval granted in CU 99-85 Condition A and CU 112-90 Conditions A and B as a Transportation Demand Management plan (TDM Plan) and the 1987 Traffic and Parking Management Plan shall continue as a condition of approval in this case except as it may be inconsistent with this approval or the Implementation Plan (see Condition C below).

  Status: This condition has been satisfied. If approved, this condition will be carried forward and be made applicable to the revised Conditional Use Master Plan.

  C. CCHS will execute and honor the Implementation Plan, signed by the school (CCHS), Buckman Community Association (BCA), and the Immediate Neighbors of Central Catholic High School (INCCH), as entered into the record as Exhibit H.19a. The obligation to implement the Plan is solely CCHS's, BCA's, and INCCH's; the City has no obligation to implement the Implementation Plan. However, non-compliance with the Implementation Plan is subject to enforcement by the City.

  Status: This condition has been satisfied. If approved, this condition will be carried forward and be made applicable to the revised Conditional Use Master Plan.

  D. Copies of the stamped Exhibits C.6 through C.11 from LU 02-131397 CU AD shall be included as part of all plans submitted for permits.

  Status: This condition has been satisfied.

- **LUR 97-00201 AD:** Adjustment review for a 25-foot tall chain link fence and net to be placed on the CCHS property line along SE 26th Avenue. Approved subject to the following condition:

  A. The net shall be black per the sample provided at the appeal hearing.

  Status: This condition has been satisfied.

- **CU 112-90:** Conditional use review for a lecture hall addition at CCHS, with an Adjustment to reduce the front building setback from 30 feet to 12 feet. Approved subject to the following conditions:

A. The new parking area shall be substantially completed and usable before removing the nine spaces which will be lost to the construction of the addition.

Status: While this condition has been satisfied, the current proposal will be reconfiguring on-site parking. As described later in this decision, four parking spaces will remain on the full block portion of the campus, with a new 15-space parking lot located at northwest corner of SE Stark Street and SE 24th Avenue.

B. The applicant shall continue to implement and enforce the existing parking management program, with the following additions:

1) The lecture hall-classroom addition shall not be used to accommodate more than the current level of 800 students. The addition shall be used to accommodate events that are currently being presented elsewhere in the school.
2) At or before the start of each school year, a representative of CCHS shall meet with representatives of the Buckman Community Association to review the schedule for special events that will be held in the school's facilities and to receive comments regarding the neighborhood's parking concerns. This meeting shall serve as an annual opportunity for parking concerns to be reviewed by the affected parties.
3) CCHS will pursue innovative solutions to evening (after 5 p.m.) parking problems generated primarily from events at the gymnasium or the lecture hall-classroom addition.
4) CCHS will not schedule evening (after 5 p.m.) events in both the gymnasium and the lecture hall-classroom addition on the same night.
5) CCHS shall urge those affiliated with the school who attend evening (after 5 p.m.) activities to park along the south side of SE Stark and the west side of SE 26th Avenue.

Status: This condition has been satisfied. Note that the reference to the 800 student cap in B1 of this condition was removed by the 2002 Conditional Use Review (LU 02131397 CU AD). The remainder of the conditions has been superseded by the 2002 Implementation Plan (Exhibit G.5).

C. The location of new driveways must be approved by the Bureau of Traffic Management and new approaches constructed to City standards. Existing driveways that are to be abandoned shall be closed and reconstructed with curb and sidewalk, matching adjacent conditions to City standards.

Status: This condition has been satisfied.

D. Bicycle parking is required at a rate of one space per 10 students not arriving on-site by bus. Bicycle parking, whether existing or to be provided, must conform with the design requirements listed in Section 33.82.030(m). The rack type and location must be indicated on the site and building plans.

Status: This condition remains in effect. Additional bike parking will be provided under the current proposal (for a total of 128 spaces) that meets current minimum bicycle parking requirements.

E. The final design of the south-facing wall of the addition should incorporate details such as fenestration, decoration and other design considerations, to soften the effect of this blank wall.

Status: This condition has been satisfied.

F. Permittee must comply with the provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

Status: This condition has been satisfied.

G. A Building Permit or an Occupancy Permit must be obtained from the Bureau of Buildings at the Permit Center on the first floor of the Portland Building, 1120 SW 5th Avenue, Portland, Oregon 97204, 796-7310, before carrying out this project, in order to assure that all conditions imposed here and all requirements of the pertaining Building Codes are met.

Status: This condition has been satisfied.

- **226-90:** Proposal to add 4,000 square feet of classroom space. No additional information is on file.

- **CU 99-85:** Conditional use review for a new gymnasium. Approved subject to the following conditions:

A. Applicants shall prepare a traffic and parking management plan for the review and approval of the Office of Transportation after input from the Buckman Neighborhood Association. That plan shall include, but not be limited to the following: goals for on-street parking; parking impact areas outside which faculty, staff and students may not park; removal of curb extension along the south side of SE Pine near SE 26th Avenue; angle parking on the west side of SE 26th, south of SE Stark; assignment of parking areas or spaces to students, faculty and staff and signage for their street locations; parking permits and criteria therefore; loading and unloading sites; striping of street parking loading spaces; an entrance and exit plan for school premises for day and night use designed to maximize use of parking spaces least impactful to nearby neighbors; school bus service for students; carpooling; public transit encouragement; a traffic control plan for nighttime activities; and a numerical limit on the number of nighttime activities which may generate more than 100 vehicles. The plan required by Condition A shall be reviewed, approved and in full operation prior to commencement of the 1986-1987 school year.

Status: This condition has been satisfied. A plan, known as the 1987 Traffic and Parking Management Plan, was previously adopted to address this condition, and has been in effect.

B. Pending further application, school enrollment shall not exceed 800 students.

Status: This condition was removed by LU 02-131397 CU AD.

C. The lots on SE 24th Avenue and Stark and Oak Streets shall be planted and maintained in a manner not adverse to neighborhood appearance no later than August 1, 1986.

Status: The lots have been planted and maintained. However, the applicant proposes under the current review to replace these two lots with a 15-space parking lot. Perimeter and interior landscaping will be provided in the new parking lot.

D. A landscaping plan for the campus shall be reviewed and approved by the Bureau of Planning and implemented prior to an Occupancy Permit for the new gymnasium.

Status: This condition has been satisfied. The landscape plan is proposed to be modified under the current review.

- **CU 42-84:** Conditional use review for a 22-space parking lot. No additional information is on file.

- **CU 62-70:** Conditional use review for a storage shed. Staff recommended approval; the final decision is not on file.

Agency Review: A Request for Response was mailed April 12, 2011. The following agencies responded with comments:

- **Portland Bureau of Transportation (PBOT)** (Exhibit E.1). PBOT's comments are detailed later in this decision in the response to Conditional Use approval criterion 33.815.105.D.2. PBOT recommends a variety of conditions of approval related to addressing transportation and parking issues.

- **Bureau of Environmental Services (BES)** (Exhibit E.2). BES' comments are detailed later in this decision in response to Conditional Use approval criteria 33.815.105.D.3. BES has no objections to the requested Conditional Use Master Plan.

- **BDS/Site Development** (Exhibit E.3). Site Development has no concerns with the requested land use reviews.

- **Portland Water Bureau** (Exhibit E.4). The Water Bureau has no objections to the requested land use reviews. More details on the Water Bureau comments are in the response to Conditional Use approval criterion 33.815.105.D.3.

- **Portland Fire Bureau** (Exhibit E.5). The Fire Bureau responded with comments that all Fire Code requirements will apply at the time of building permit review.

- **Portland Bureau of Police** (Exhibit E.6). The Police Bureau commented that they are capable of serving the proposed use at this time.

- **Portland Parks and Recreation/Urban Forestry** (Exhibit E.7). Urban Forestry responded with no concerns regarding the requested land use reviews.

- **BDS Life Safety Plans Examiner** (Exhibit E.8). The Life Safety Plans Examiner provided information on building permit requirements. No specific concerns regarding the proposal were identified.

Neighborhood Review: A Notice of Proposal was mailed on May 12, 2011. As of the date the Staff Report went to print, a total of 22 written responses were received from surrounding residents, all in opposition to the requested proposal (Exhibits F.1 through F.22). The major issues included in the comments included the following:

- too many activities occurring on-site, particularly on the athletic field, that are unrelated to the school;
- increased capacity of the proposed additions will increase the scale and intensity of the school, adversely impacting livability of adjacent residential neighborhood;
- the resulting size and scale of the buildings are more suited to a commercial or industrial area;
- the widening of SE 24th Avenue will bring the school building closer to the street, with a dramatic reduction in the ability for landscaping to soften the building's appearance;
- on-site parking in an amount commensurate with the number identified in Table 266-2 of Zoning Code Chapter 33.266 (Parking and Loading) should be provided;
- the amount of traffic generated by the school on weekdays and weekends adversely impacts neighborhood livability;
- buses associated with the school idle and double park along SE Pine Street;
- opposed to expanding school functions into three houses CCHS owns on SE Oak and SE Stark Street, west of the proposed parking lot;
- problems with students and parents blocking driveways to residential properties;
- enforcing the student parking permit program;
- need to provide free transit passes and secure, covered bike parking;
- noise issues associated with the school's existing rooftop HVAC unit;
- noise generated from sports activities on the athletic field;
- the need to construct more parking on-campus, potentially in parking garage;
- problems with litter;
- on-site events and activities extending to as late as 11:00 p.m.;
- student drop-off and pick-up occurring in drive lines on public streets blocks traffic;
- lack of any requirement that proposed improvements to the public right-of-way will take place; and
- constructing a parking lot on the two properties at the corner of SE 24th Avenue and SE Stark Street will further diminish the residential character of the neighborhood.

The Buckman Community Association also submitted written comments in opposition to the proposal (Exhibit F.23). The major issues raised in the Community Association's comments included the following:

- significant issues with parking and traffic flow in the surrounding residential area;
- the second-story addition significantly conflicting with the residential character of the area; and
- the addition of a new parking lot at the corner of SE 24th Avenue and SE Stark Street, which is viewed as the beginning of future incursions into the surrounding residential area.

Prior to the public hearing held on June 6, 2011, two written responses were received in support of the institution from the Catholic Youth Organization (CYO) (Exhibit F.24), and an area business (Exhibit F.25). CYO indicated they have reduced events held at

CCHS over the past 10 years and will further reduce events held at this site. They indicated they will work with CCHS to implement operational changes regarding when CYO games occur. The area business, located at East Burnside and SE 28th Avenue, noted students conduct themselves with poise, and the CCHS faculty is responsive to problems or questions that have been brought to their attention.

SUMMARY OF HEARINGS OFFICER HEARING AND OPEN RECORD PERIOD

At the June 6, 2011 public hearing before the Hearings Officer, Douglas Hardy, BDS Staff representative, provided an overview of the staff report and key issues. His presentation closely followed the Power Point printout in Exhibit H.13.

John Harrington, President of CCHS, gave testimony covering the history of the school and the desire for the proposed expansion. He stated that over the last 10 years the total number of students ranged from 790-870. He noted that the school owns three rental homes on the west side of SE 24th Avenue and that those properties are not part of the current application. He also testified that the applicant accepted all of the proposed conditions recommended by staff.

Chris Linn of Boora Architects explained the preparatory work done by the applicant prior to submitting the application. He stated that three facilitated meetings with the neighborhood were held and a total of approximately 12 meetings were held with neighbors as part of the application process. As part of past Good Neighbor Agreements in 1987 and 2002, the school posts four staff members daily during the pick-up and drop-off periods to manage traffic. He explained that with the proposed changes to the school, SE 24th Avenue will be widened to allow two-way traffic with parking on both sides of the street. The existing gym entrance is proposed to become exit only, and a new entrance would be built in a location to the south of the current entrance. The purpose of this change, he stated, was to decrease traffic conflicts near the corner of 24th Avenue and Pine Street. He testified that with the proposal, no bus parking and idling will be allowed on Pine Street on the north side of the school.

On the issue of parking in the neighborhood, he stated that at full occupancy of available parking space around the school by students, there still exists a 20 percent surplus of available parking spaces in the immediate area. In order to address neighbor concerns, the school is proposing to reduce the number of large athletic events and non-school events. He stated that the proposed new parking lot on 24th Avenue can accommodate up to 20 additional cars over the proposed 15 spaces for large events, which he stated was intended to mitigate parking pressure on the neighborhood during those periods.

Steve Janik testified about the legal aspects of the application. He stated that the public hearing was not a forum for a code enforcement action, nor was it in his opinion a political referendum. He stated that the proposal would not increase the number of students over current levels. For that reason, he argued that the focus of the Hearings Officer's review should be on the impacts of the proposal as evaluated by the applicable criteria, not on the existing impacts that the school is alleged to have on the surrounding neighborhood. He testified that the relevant legal standard set forth in Portland City Code (PCC) 815.105 is to determine if the proposal will have a "significant adverse impact" on the surrounding area. He stated that although this was a subjective standard, review was limited to the listed impacts in PCC 815.105(c). He noted that the staff report found that public services, transportation and parking would all continue to be adequate with the proposal.

He argued that the Religious Land Use and Institutionalized Persons Act ("RLUIPA") applied to the application. He asserted that any restriction placed on the school's operations must demonstrate a "compelling interest" to be promoted in the limitation. He identified Oregon Supreme Court cases that he argued prohibited denial of the application under the RLUIPA. He stated that these cases applied because, without the proposed improvements to the school, families would not enroll their children in the school which in turn would case the school to not be economically viable. He stated that the conditions recommended by staff were acceptable and did not violate RLUIPA. In conclusion, he asked that the record remain open for seven days. The Hearings Officer acknowledged the request.

Melissa Alvarez and Brendan O'Callaghan testified in favor of the application. They both explained the need for more classroom space.

Charles Hunter testified in favor of the application. He made a comparison of the school's Good Neighbor Agreements to the guidelines he was familiar with at Grant High School. He felt that such agreements could be effective at mitigating the traffic impacts associated with the school.

Charlie Christensen testified in opposition to the application. He asserted that the school has expanded from its original footprint over time. He cited aerial photographs taken in the 1940's that showed houses where the current athletic field is now located. He testified that the traffic management plans in the 1987 and 2002 Good Neighbor Agreements had no mechanism for registering or tracking neighbors' complaints, and for that reason, there was no institutional memory at the school for past promises made. He asserted that the 2002 agreement eliminated City Youth Organization football games and today there are six per year. He argued that the 1987 and 2002 agreements obligated the school to "explore" off-site parking such as a parking structure and that no forward motion has taken place on that topic for 24 years. He stated that the "smart trips" program designed to reduce the number of students driving to school cannot be effective because most students travel from outside the area to attend the school.

Mr. Christensen testified that the proposal to move the 24th Avenue gym entrance would not make any difference to the traffic problems experienced by the neighborhood. He recommended entrances on Stark Street away from the neighborhood. He suggested portable and changeable message signs to help with event traffic. As to parking, he stated that aerial photos from the 1980's showed about 40 on-site spaces, and that number has been slowly reduced to 22 spaces in the intervening years. The new parking lot does not compensate for that loss, he argued. He stated that a parking garage under the current athletic field was possible and that the applicant's cost estimates seemed high. He similarly argued that the applicant's traffic study was based on the lowest enrollment number of 788 and should be higher.

Linda Gerber testified that in her opinion the school had not been committed to the 1987 and 2002 neighbor agreements. She felt that non-school events had again crept up to pre 2002 levels. She also stated that the dedicated telephone number established by the school for complaints had been disconnected. She stated that 24th Avenue is extremely congested and dangerous, particularly during drop-off and pick-up periods, and during events. She was opposed to the proposed new parking lot because it diminishes the residential character of the neighborhood.

Susan Lindsay, Co-Chair of the Buckman Community Association, testified that the core issue for the neighborhood is that the school has become a commuter campus which brings the parking and traffic impacts. The neighborhood opposes losing the two

residential lots as those lots have become open space. She stated that the new parking lot will not eliminate the existing parking and traffic concerns. The Hearings Officer asked Ms. Lindsay whether the association believed that the City's existing code required the applicant to build a parking garage either on or off-site. She replied that she was unsure because the group did not have a lawyer.

Patricia Sweeney testified that when she bought her home she did not know that the impacts from student drivers would be so severe. She stated that her husband needed for their house to be retrofitted to become ADA ("Americans with Disabilities Act") approved. This was a substantial cost and now she feels stuck in a neighborhood with huge evening and weekend parking problems. She recommended employing the school's drop-off and pick-up strategy for evening and weekend events, or adding it to the Transportation Management Plan.

Chris Marston testified about noise impacts from the heating and cooling system. He stated that the 2002 agreement allowed the HVAC system to be changed, but the new system was very loud and caused a noise ordinance violation. He explained that the maximum decibel range for the system was remedied so that it runs at approximately 50 dBs, but that the machine cycles on and off every three to five seconds which is very annoying for adjacent residents. His position was that the neighborhood has asked for noise reductions and the proposed expansion will require the HVAC system to work even harder to heat and cool a larger space.

Ed Kerns stated that he was opposed to the proposed parking lot. He urged that a parking area be built under the athletic field. He stated that it was his memory that in one of the prior hearings, the Hearings Officer had told the school not to seek another application until the parking situation was solved.

Sandy Sampson submitted a letter dated June 6, 2011, and gave oral testimony based on the letter. She stated that the letter chronicled the school's failure to comply with past conditions. She emphasized the cumulative impact of taking the two lots on 24th Avenue out of residential use combined with the new height of the proposed additions and the lack of buffering between the school and neighborhood. It was her position that those elements cumulatively would cause an irrevocable change in the character of the neighborhood. She also felt that the proposed changes would transfer parking and traffic impacts well beyond the four corners of the school. She urged the Hearings Officer to impose conditions that have a mechanism to ensure compliance with any conditions past and future.

James Wood argued that the applicant should build the two public works components of the project first and determine whether those were having a positive impact on the existing parking and traffic conditions. He noted that Grant High School has 84 dedicated parking spaces for students. He felt that the applicant knew the parking constraints of the neighborhood, but continued to impose those impacts on the surrounding area instead of considering real solutions. He recommended that the school consider a parking garage, voluntarily limiting the enrollment or moving the school to a better location. He also questioned the validity of the applicant's traffic study because it did not assess impacts on Ash Street or other more distant streets.

Carmen Brannon testified that the two residential lots were part of the neighborhood's greenspace and that losing them would change the character of the neighborhood. She also provided several lovely stanzas of Joni Mitchell's "Big Yellow Taxi."

Laura Jaeger, Dean of Students for the school, provided rebuttal testimony for the applicant. She explained that several non-school events have been discontinued.

These include weekly Alcoholics Anonymous meetings, CYO volleyball and basketball tournaments, and a reduction of CYO football games from 6-8 to 4 per season. She estimated that individual games attract 20-30 additional cars to the school. She explained that the 1987 Good Neighbor Agreement was oriented to weekday use and is primarily intended to manage drop-off and pick-up times. She noted that to mitigate weekend and evening parking impacts, the school had arranged for signs to be posted in the neighborhood asking students and parents to park elsewhere. She addressed the HVAC noise complaint explaining that the complaint had been investigated and that the school had installed baffling which has been somewhat effective. She also explained how that school's complaint hotline number had been changed to a new number.

At the close of the public hearing, the Hearings Officer left the record open for a total of three weeks to accept additional evidence and testimony. The applicant has objected to some of this evidence being allowed into the record. The first objection is to two memorandums from Paul van Orden of the City's Noise Control Office (Exhibits H.11 and H.16). The applicant argues that these memos constitute "staff reports" as that term is used in ORS 197.763, and must be removed from the record because they were not available seven days before the hearing as required by that statute (Exhibits H.19 and H.20). The Hearings Officer does not agree that the memos represent staff reports of the sort controlled by ORS 197.763. There is no dispute that the BDS staff report in this matter was available within the time set forth in the statute. The Noise Office comments are just that, comments from an interested party on an issue pertinent to the application. They are not intended to be part of the BDS staff report, and in fact discuss two discreet issues related to one part of one approval criteria. The memos are properly part of the record.

The applicant also objects to opponent evidence submitted during the second seven day period in which the record was open (June 13-20, 2011). Exhibit H.31. The basis of the argument is that the opponents proffered additional evidence during a period in which state law limits submittals to responsive argument only, no new evidence allowed. At the close of the June 6, 2011 hearing, the Hearings Officer explained that the open record period would be divided into three sections. The first period was to be for argument or evidence on any issue. The second period was to be limited to responses (argument) in response to issues raised in the first period. The final seven day period was reserved for the applicant's final response as required by state law. The applicant does not identify specific evidence that the opponents submitted which is objectionable, but simply argues that evidence and argument are mixed together in much of the opponents' letters, and therefore, cannot be relied upon by the Hearings Officer. The Hearings Officer carefully reviewed all the written submissions submitted during the open record period between June 13 and June 20, 2011 (Exhibits H.22 through H.28). These letters largely reiterate prior written arguments and testimony offered at the June 6, 2011 hearing. The Hearings Officer found that there was very little, if any, new relevant evidence submitted. To the extent that new evidence was present, the Hearings Officer found, and City Council agrees, its presence to be harmless and not determinative of the outcome of this decision. The identified exhibits remain part of the record.

ZONING CODE APPROVAL CRITERIA

These findings detail staff's recommendations and the findings and interpretations adopted by the Hearings Officer in his July 14, 2011 opinion. The City Council agrees with, and hereby adopts all of the Hearings Officer's findings, conclusions and interpretations as the City Council's own.

33.820 Conditional Use Master Plans

33.820.050 Approval Criteria Requests for conditional use master plans will be approved if the review body finds that the applicant has shown that all of the following approval criteria are met:

A. The master plan contains the components required by 33.820.070;

Findings: BDS staff found that the applicant has addressed all the required Master Plan components. The opponents did not argue that the application is incomplete. This criterion is met.

B. The proposed uses and possible future uses in the master plan comply with the applicable conditional use approval criteria; and

Findings: The applicable Conditional Use approval criteria for this review are found in Zoning Code Section 33.815.105 (Institutional and Other Uses in R Zones). A discussion of the proposal's compliance with these criteria is included later in this decision. This criterion is also met.

C. The proposed uses and possible future uses will be able to comply with the applicable requirements of this Title, except where adjustments are being approved as part of the master plan.

Findings: The proposed facility is classified as a School use and is allowed as a Conditional Use in the R5 zone. Conditional Use criteria of 33.815.105 (Institutional and Other Uses in R Zones) are discussed later in this decision. The applicant will also be required to meet the applicable development standards for institutions found in Zoning Code Chapters 33.110 (Single-Dwelling zones) and 33.266 (Parking and Loading), except as adjusted.

33.820.070 Components of a Master Plan
The following are the master plan components required by 33.820.070.

A. Boundaries of the use. The master plan must show the current boundaries and possible future boundaries of the use for the duration of the master plan.

Findings: The Master Plan boundaries are identified on Exhibit C.1. The existing Master Plan boundary encompasses a full block, extending from SE Stark Street to SE Pine Street, and from SE 24th Avenue to SE 26th Avenue. The applicant requests expanding this boundary to include two lots located at the northwest corner of SE Stark Street and SE 24th Avenue.

Several opponents argued and submitted aerial photos that they say show that residential uses existing in the 1940s were displaced by the current athletic field. This is evidence that they claim shows a pattern of expansion into the neighborhood. The opponents argue that this pattern is continuing with the proposed parking lot on the west side of 24th Avenue. They also fear that three residences currently owned by the school just to the west of the proposed parking area will eventually become school administration buildings or something other than residential use.

The Hearings Officer found that the aerial photos and assertions of a pattern of expansion are not relevant to this application. The school's history of growth does

not indicate any definitive pattern for the future. This application leaves the three residences to the west of the proposed parking lot out of the Master Plan, and the record shows that the school has stated that the residences will continue to be used for residential purposes or sold. This criterion does not require that the school remain confined to any historical boundary. The Hearings Officer found assertions that the school is intentionally expanding into the surrounding neighborhood are speculative and even if they could be demonstrated, would not violate this code criterion. However, in recognition of neighbors concerns about future school expansion into the adjacent residential, the applicant indicated at the City Council appeal hearing that they would voluntarily place a restrictive covenant on the three properties west of the proposed parking lot that prohibits the use of these properties for any use other than primary and accessory uses that are "allowed" or "limited" in the R5 zone, as provided in PCC 33.110.100(A), PCC 33.110.100(B), PCC 33.110.110 and Table 110-1 (including future amendments). These properties are legally described as Daltons Add, Block 1, Lot 2; Daltons Add, Block 1, Lot 3; and Daltons Add, Block 1, Lot 9. The City Council finds that a condition requiring this covenant will provide additional assurance to nearby residents regarding the future use of these properties.

This criterion is met.

B. General statement. The master plan must include a narrative that addresses the following items:

1. A description in general terms of the use's expansion plans for the duration of the master plan;
2. An explanation of how the proposed uses and possible future uses comply with the conditional use approval criteria; and
3. An explanation of how the use will limit impacts on any adjacent residentially zoned areas. The impacts of the removal of housing units must also be addressed.

Findings: BDS staff found that page 4 of the applicant's written statement (Exhibit A.1) contains a detailed description of the use's expansion plans for the duration of the ten year Master Plan. Generally, this includes expanding the existing school facility by 48,000 square feet over three phases. A new 15 space parking area is proposed for two vacant lots at the corner of SE 24th Avenue and SE Stark Street which will in part compensate for the loss of parking spaces on the interior of the main campus. Adding the new parking lot will result in a net gain of two off-street parking spaces for the school.

An explanation of how the proposed uses comply with the Conditional Use approval criteria is included on pages 15-23 of the applicant's statement (Exhibit A.1), with additional explanation provided in a memorandum from the applicant dated April 5, 2011 (Exhibit A.2). This is supplemented with a Traffic Impact Study and TDM Plan (Exhibit A.3), a Stormwater Report (Exhibit A.4), and the 1987 Traffic and Management Plan (Exhibit G.4) and the 2002 Implementation Plan (Exhibit G.5). This material also includes an explanation of how the use will limit impacts on adjacent residential areas, with a summary of specific strategies identified on pages 7 and 8 of the applicant's statement (Exhibit A.1). Additional strategies CCHS will implement that further reduce impacts on the surrounding residential area are included in the 2011 Traffic and Parking Mitigation Measures document, included as Exhibit A.7. The written response to the Adjustment approval criteria, included on pages 24-35 of the applicant's statement (Exhibit A.1), also provides an explanation of how the use will limit impacts on adjacent residential areas. No housing units will be removed as part of this proposal. The Hearings Officer found

that this information is sufficient to address this criterion, and the City Council concurs.

C. Uses and functions. The master plan must include a description of present uses, affiliated uses, proposed uses, and possible future uses. The description must include information as to the general amount and type of functions of the use such as office, classroom, recreation area, housing, etc. The likely hours of operation, and such things as the approximate number of members, employees, visitors, special events must be included. Other uses within the master plan boundary but not part of the conditional use must be shown.

Findings: Pages 8-10 of the applicant's written statement (Exhibit A.1) provides a description of present uses, affiliated uses, proposed uses, and possible future uses. Included in this description is information on the hours of operation for the school; student enrollment and number of faculty; as well as the number, type, and average attendance at extracurricular events and activities (supplemented by an event calendar included in Exhibit A.2). The 2011 Traffic and Parking Mitigation Measures document (Exhibit A.7) contains modifications to the current event schedule that will reduce the total number of school and non-school events on the campus. The Hearings Officer found that this information is sufficient to meet this criterion, and the City Council concurs.

D. Site plan. The master plan must include a site plan, showing to the appropriate level of detail, buildings and other structures, the pedestrian, bicycle, and vehicle circulation system, vehicle and bicycle parking areas, open areas, and other required items. This information must cover the following:

1. All existing improvements that will remain after development of the proposed use;
2. All improvements planned in conjunction with the proposed use; and
3. Conceptual plans for possible future uses.
4. Pedestrian, bicycle, and transit facilities including pedestrian and bicycle circulation between:
   a. Major buildings, activity areas, and transit stops within the master plan boundaries and adjacent streets and adjacent transit stops; and
   b. Adjacent developments and the proposed development.

Findings: The application includes a series of plans that show existing and proposed improvements, including a Site Plan (Exhibit C.2) and a Phasing Plan (Exhibit C.4). These plans identify building locations, pedestrian and bicycle facilities, open areas, as well as improvements proposed within the public rights-of-way. The proposed building elevations are included in Exhibit C.3, with artist's renderings in Exhibits C.6 and C.7. The Hearings Officer found that this information meets the requirements of this code section, and the City Council concurs.

E. Development standards. The master plan may propose standards that will control development of the possible future uses that are in addition to or substitute for the base zone requirements and the requirements of Chapters 32.32 and 32.34 of the Sign Code. These may be such things as height limits, setbacks, FAR limits, landscaping requirements, parking requirements, sign programs, view corridors, or facade treatments. Standards more liberal than those of the code require adjustments.

Findings: The applicant is not proposing standards that are in addition to or substitute for those included in Title 33 (Zoning Code), or in Title 32 (Signs and

Related Regulations). The applicant is requesting four Adjustments to the institutional development standards of the Single-Dwelling zones (Chapter 33.110). Those Adjustments are described below.

F. Phasing of development. The master plan must include the proposed development phases, probable sequence for proposed developments, estimated dates, and interim uses of property awaiting development. In addition the plan should address any proposed temporary uses or locations of uses during construction periods.

Findings: The proposed phasing plan is identified on page 12 of the applicant's written statement (Exhibit A.1), with a phasing diagram and table included as Exhibits E and F in that document. (The Phasing Plan is included in this decision as Exhibit C.4.) Three phases of development are proposed, with the first identified as beginning in June 2012; no specific date is identified for the subsequent phases. BDS staff concluded, and the Hearings Officer agreed, that this code criterion does not require CCHS to identify the specific timing and order of projects within the three phases, and as such, the development identified in the three phases can occur anytime within the life of the Master Plan. As discussed later in this decision, PBOT recommends conditions of approval specifying when public improvements in SE 24th Avenue must be completed and when the new parking lot must be completed. BDS also recommended a condition of approval that the Conditional Use Master Plan expire in 10 years from the date of final decision.

G. Transportation and parking. The master plan must include information on the following items for each phase.

1. Projected transportation impacts. These include the expected number of trips (peak, events and daily), an analysis of the impact of those trips on the adjacent street system, and proposed mitigation measures to limit any projected negative impacts. Mitigation measures may include improvements to the street system or specific programs and strategies to reduce traffic impacts such as encouraging the use of public transit, carpools, vanpools, and other alternatives to single occupancy vehicles.
2. Projected parking impacts. These include projected peak parking demand, an analysis of this demand compared to proposed on-site and off-site supply, potential impacts to the on-street parking system and adjacent land uses, and mitigation measures.

Findings: The application includes a Traffic Impact Study (TIS) and TDM Plan prepared by a registered professional engineer at Lancaster Engineering (Exhibit A.3). This document contains an analysis of traffic and parking impacts, as well as a TDM Plan. The applicant will also continue to implement the 1987 Traffic and Parking Management Plan (Exhibit G.4) and the 2002 Implementation Plan (Exhibit G.5). The applicant also has submitted an additional document that includes measures to address parking and traffic issues (Exhibit A.7). PBOT has reviewed this information and, with conditions, found it to be adequate.

Several opponents criticized the TIS for analyzing parking supply in the vicinity of the school. They argued that the area of analysis, an approximately four block area surrounding the school, seemed too large. They asserted that the scope of the study area assumes that it would be acceptable for residents to walk up to four blocks from their parked cars to their homes (Exhibit H.22). Other opponents argued that the request for the additional 15-space parking area is evidence in and of itself that there is insufficient parking supply in the surrounding neighborhood (Exhibit H.26).

BDS staff offered additional explanation of the TIS in a memo dated June 13, 2011, which clarifies that the TIS examined parking supply in a smaller area for the streets covered by the 1987 and 2002 Good Neighbor Agreements, and a slightly larger area which appears to be the four block area bounded by SE 20th Avenue on the west, SE Ankeny Street on the north, SE 28th Avenue on the east and SE Morrison Street on the south (Exhibit H.21). The parking study showed that parking in the smaller area is at approximately 81 percent capacity even during school days. For the larger area the parking capacity is about 64 percent.

The Hearings Officer found, and the Council concurs, that there is no evidence in the record to support the contention that the TIS or the estimate of available parking spaces in the vicinity of the school is technically deficient or fails to comply with applicable provisions of the PCC. Assertions that the study area "seems too large" are not sufficient by themselves to find that the TIS is flawed. The opponents did not provide any evidence to directly contradict the findings or methodology of the TIS and parking study. Without such evidence, the Hearings Officer did not find that the TIS and parking study are deficient to a degree that would warrant denial of the application. The City Council concurs with the Hearings Officer's conclusion.

H. Street vacations. The master plan must show any street vacations being requested in conjunction with the proposed use and any possible street vacation s which might b e requested in conjunction with future development. (Street vacations are under the jurisdiction of the City Engineer. Approval of the master plan does not prejudice City action on the actual street vacation request.)

Findings: No street vacations are requested.

I. Adjustments. The master plan must specifically list any adjustments being requested in conjunction with the proposed use or overall development standards and explain how each adjustment complies with the adjustment approval criteria.

Findings: As detailed on pages 24-36 of the applicant's written statement (Exhibit A.1), four Adjustments are requested. These include the following:

- increase the maximum allowed FAR on the site from 0.56:1 to 0.68:1;
- reduce the minimum required building setback for the second story addition on SE Stark Street from 12 feet to 0 feet (replicating the existing setback of the first story);
- reduce the minimum required building setback along SE 24th Street from 15 feet to six feet, six inches for portions of the existing building walls along this frontage; with the exception of a modified trash enclosure proposed along this frontage, the reduced setback is not the result of new construction but the result of widening SE 24th Avenue, which will move the property line seven feet closer to the existing building walls;
- reduce the depth of the minimum required landscaped buffer along SE 24th Avenue from 15 feet to six feet, six inches resulting from the widening of SE 24th Avenue; and
- reduce the minimum landscaped area (for the entire site) from 10 percent to 8.5 percent.

A discussion of how the requested Adjustments meet the required approval criteria is included later in this decision.

J. **Other discretionary reviews.** When design review or other required reviews are also being requested, the master plan must specifically state which phases or proposals the reviews apply to. The required reviews for all phases may be done as part of the initial master plan review, or may be done separately at the time of each new phase of development. The plan must explain and provide enough detail on how the proposals comply with the approval criteria for the review.

Findings: There are no discretionary reviews requested other than the Conditional Use Master Plan, the Conditional Use, and the Adjustments.

K. **Review procedures.** The master plan must state the procedures for review of possible future uses if the plan does not contain adequate details for those uses to be allowed without a conditional use review.

Findings: The applicant's initial Conditional Use Master Plan submittal identified an alternative review procedure for the future expansion of the Master Plan boundary. This expansion was intended to allow school use of three lots owned by CCHS located just west of the proposed 15-space parking lot. The applicant withdrew that request prior to the June 6, 2011 public hearing and it is not considered as part of this decision. Review of future Master Plan boundaries, future uses and future development not identified in the current application will be reviewed pursuant to the procedures of Zoning Code Section 33.820.090 (Amendments to Master Plans).

Summary: The Hearings Officer found, and the City Council concurs, that the applicant has submitted a complete and detailed Master Plan document that contains all elements required by Zoning Code Section 33.820.070, and therefore the requirements for a Conditional Use Master Plan are met.

33.815.105 Institutional and Other Uses in R Zones
These approval criteria apply to all conditional uses in R zones except those specifically listed in sections below. The approval criteria allow institutions and other non-Household Living uses in a residential zone which maintain or do not significantly conflict with the appearance and function of residential areas. The approval criteria are:

A. **Proportion of Household Living uses.** The overall residential appearance and function of the area will not be significantly lessened due to the increased proportion of uses not in the Household Living category in the residential area. Consideration includes the proposal by itself and in combination with other uses in the area not in the Household Living category and is specifically based on:

1. The number, size, and location of other uses not in the Household Living category in the residential area; and

Findings: BDS staff found that in this case the "residential area" is determined by using boundaries such as major streets, commercial zoning, or topographic features. For the CCHS site, this is identified as the residentially zoned area bounded by East Burnside on the north, SE Belmont Street on the south, SE 20th Avenue on the west and SE 30th Avenue on the east.

Within the approximately 40-block residential area described above, the applicant has identified 13 non-residential uses, mostly smaller nonconforming retail and office uses. There is one additional institutional use within this area

(Grace and Truth Pentecostal Church) located one block west of the CCHS site in a small, 1,300 square foot building.

With the exception of the proposal to expand the CCHS Conditional Use boundary westward to construct a 15-space parking lot, the school itself is not a new, non-residential use in this residential area. The school has been operating at the main campus since 1939. While CCHS proposes to expand the floor area as part of this review, this is only an expansion of an existing use on the site, not a new use. The intensity and scale of this expansion is discussed below in response to Approval Criterion 33.815.105.A.2 and Approval Criterion 33.815.105.B. Size and appearance of the building expansion are discussed below in response to Approval Criterion 33.815.105.B.

BDS staff found that the parking lot expansion does not significantly lessen the overall residential appearance and function of the residential area for several reasons. First, the parking lot will be limited to two parcels with a combined area of 9,657 square feet. That area represents a four percent increase in the size of the CCHS campus boundary and a much smaller fraction of the total land area in the surrounding residential area. BDS staff also found that landscaping within the parking lot, around the perimeter of the parking lot, with additional landscaping within the public right-of-way adjacent to the lot, will help blend the parking lot into the surrounding residential neighborhood.

Many neighbors, including the Buckman Community Association, expressed concerns about the new parking lot being the beginning of an incursion of CCHS uses into the surrounding residential area. At the Hearings Officer and City Council hearings, and in written submissions, opponents strongly objected to building a parking lot on these two vacant lots. They argued that changing the use from current de facto open space will change the character of the neighborhood. They stated that after 25 years as vacant lots, a parking lot would represent a new use (Exhibit H.25). They are concerned that the parking lot is an incursion into the neighborhood, and that the loss of even two lots to non-residential use will adversely impact the residential character of the neighborhood. The applicant has suggested that the parking lot will act as a buffer between the school and the nearby residences.

The Hearings Officer stated he understands and is sympathetic to the neighborhood's desire to protect the residential nature of the area surrounding the school. On the other hand, he indicated the lots are currently vacant and parking is a use permitted by the PCC in this circumstance, whether it is considered a new use or not. BDS staff has correctly stated that the code standard in this instance states that the proposed use must not cause the overall residential appearance and function of the area to be "significantly lessened."

There is nothing in the PCC that would require the school to ever build homes on these two vacant lots. Similarly, the PCC cannot require that the school continue to provide what amounts to public open space on private property for the neighborhood's benefit and enjoyment.

BDS staff found, and the Hearings Officer and City Council agreed, that the proposed expansion on the full block portion of the campus does not increase the proportion of uses not in the Household Living use category, and does not result in a significant negative impact on the overall residential function and appearance of the area due to size, number or location of non-Household Living

uses. The City Council concurs with this conclusion. Likewise, the proposed expansion of the campus boundary to accommodate a 15-space parking lot, while increasing the proportion of lots in the area in non-residential use, does not significantly alter the residential function or appearance of the surrounding area.

This criterion is met.

2. The intensity and scale of the proposed use and of existing Household Living uses and other uses.

Findings: The applicant proposes a 48,000 square foot expansion of the existing CCHS school facility. This floor area is proposed to be constructed over three phases, and include upper floor additions along both the SE 24th Avenue and SE Stark Street frontages of the site, as well as a new addition internal to the campus. The internal addition, at 29,000 square feet, represents 60 percent of the new floor area being proposed.

The applicant indicates the intent of the floor area expansion is not to increase the intensity/student enrollment on the site, but rather to bring the school up to more modern high school standards. Historically, school enrollment has fluctuated from a high of 1,100 students in the 1960s to a low of 500 students in the 1980s. Over the past six years average enrollment at the school has been 821 students, with a 2009-2010 enrollment of 788. With the proposed additions, CCHS expects enrollment to remain at the 800 to 850 student level. This allows the school to maintain its desired teacher/student ratio of approximately 1:26. BDS staff found, and the Hearings Officer agreed, that an enrollment level between 800-850 students does not represent a significant change in intensity of the use over existing conditions. The City Council concurs with this conclusion.

The Hearings Officer also found, and the City Council concurs, that the proposed additions to the main campus area do not represent a significant intensification of use. BDS staff noted that the proposal adds just one new classroom. The remainder of the new and reconfigured space is intended to enrich the academic experience for a student body that is anticipated to remain between 800-850 students. With the exception of the one new classroom, the remainder of the floor area will be devoted to such uses such as a larger visual arts space, a larger band and choir room, multi-purpose commons space, improved administrative office, a counseling center, and other space that supports the existing program. Regarding events, the applicant has provided a table that identifies all events that currently occur on campus (Exhibit A.2).

At the public hearings and in written testimony, neighbors argued that the number and frequency of events, both school and non-school related, cause parking impacts, noise and inconvenience in the surrounding neighborhood, particularly around SE 24th Avenue. Based in part on the applicant's meeting with neighborhood residents, the applicant has agreed to voluntarily limit or eliminate many of these events. As indicated in Exhibit A.7, the applicant proposes the following reductions in on-campus events to occur no later than the 2012-2013 school year:

- eliminate all City volleyball events;
- eliminate all CYO basketball events;
- eliminate all Concordia University events;

- eliminate freshman football games on the school's athletic field;
- eliminate one school dance;
- reduce the number of CYO football events by half; for the remaining CYO football events, games will be staggered so one game's attendees can depart before the next group arrives.
- in addition to the elimination of the City volleyball events, reduce by one the number of other weekend volleyball tournaments that the school hosts.

The school also proposes eliminating all non-school activities held at the campus on Sundays. During the summer, CCHS proposes locking the existing athletic entrance at SE 24th Avenue (between SE Oak and SE Pine Streets), and the Oak Street entrance on SE 24th Avenue. Access to the school during this time will be limited to the entrance at SE Stark Street and SE 24th Avenue, and through the gate at SE 26th Avenue and SE Stark Street. This is intended to reduce the level of activity that on-campus events have on the narrower side streets, and redirect that activity closer to SE Stark Street.

Under past Conditional Use approvals, the traffic and parking impacts associated with the school operation have been regulated by the 1987 Traffic and Parking Management Plan (Exhibit G.4) and the 2002 Implementation Plan (Exhibit G.5). The 1987 Plan includes such measures as:

- establishing a geographic boundary for where daytime, school-related on-street parking is allowed, not allowed, or allowed only for drop-off and pick-up;
- allocating annually a maximum of 225 parking permits for faculty, staff and students;
- denying parking permits for sophomores;
- requiring the school to enforce compliance with the defined parking area; and
- promote use of carpools.

Principal elements of the 2002 Implementation Plan include:

- requiring all students to register vehicles with the school;
- enforcing a modified geographic on-street parking area boundary established in the 1987 Plan, and increase penalties for noncompliance;
- establishing a complaint line at the school to increase communication with neighbors;
- exploring establishing an area parking permit program;
- pursuing off-street parking alternatives, including an on-site parking structure and long-term leases of off-site parking lots in the vicinity of the school;
- reducing congestion at SE 24th and SE 26th Avenues during school start and end times;
- limiting the number of evening and weekend events that draw large crowds;
- not adding new categories of evening and weekend events to the school calendar; and
- reducing or mitigating impacts of non-student events drawing large numbers of people to the site.

The opponents' testimony at the public hearings before the Hearings Officer and the City Council, and in written submissions, was mixed on the question of whether these measures have been adequately implemented and whether they are effective. There was abundant testimony that since 2002, the school has allowed CYO events to creep back up to pre-2002 agreement levels. While the testimony was largely anecdotal, the Hearings Officer found no reason to doubt its credibility and the applicant appeared to concede that some event creep may have occurred since 2002. However, the Hearings Officer noted, and the City Council concurs, that the record does not contain any evidence that the City received any code enforcement complaints about events since 2002. That issue is discussed in more detail below. Absent that type of evidence in the record, the Hearings Officer was not able to conclude that the conditions of the 2002 Good Neighbor Agreement have not been met to a degree that would warrant denial of this application. The City Council concurs with the Hearings Officer's conclusion on this issue.

To address outstanding parking and traffic issues that have been raised by the Buckman Community Association and surrounding neighbors, and issues associated with the overall intensity of activity at the school, CCHS proposes to implement a Transportation and Parking Mitigation Measures Plan that goes beyond the measures required by the 1987 and 2002 plans. Those measures are identified in Exhibit A.7 and include:

- adjust pedestrian access away from residences;
- improve traffic flow;
- increased accountability;
- bus loading and unloading;
- increase parking supply;
- improve pedestrian safety;
- TDM Plan;
- parking demand management; and
- event transportation and parking management.

The applicant has agreed that the measures identified in Exhibit A.7 will become conditions of approval.

The Hearings Officer found, and the City Council agrees, that the measures identified in Exhibit A.7 will decrease the intensity of use to at least the level represented by the 2002 neighborhood agreement and is a significant decrease in the present intensity of events at the school. Taken together, the measures set forth in the 1987 and 2002 agreements, and the measures in Exhibit A.7, demonstrate that the future operations of the school as proposed will not significantly lessen the appearance and function of the neighborhood.

With these conditions, this criterion is met.

B. Physical compatibility.

1. The proposal will preserve any City-designated scenic resources; and

Findings: City-designated scenic resources are indicated on City zoning maps by a lowercase "s." As there are no scenic resources on the subject site, this criterion is not applicable.

2. The proposal will be compatible with adjacent residential developments based on characteristics such as the site size, building scale and style, setbacks, and landscaping; or

Findings: For the same reasons discussed in criterion #3 below, the Hearings Officer finds that the proposal will be compatible with adjacent residential development.

3. The proposal will mitigate differences in appearance or scale through such means as setbacks, screening, landscaping, and other design features.

Findings: The applicant proposes to add an additional 48,000 square feet of floor area to the existing school. The majority of the new floor area (29,000 square feet) will be located internal to the campus, on the east side of the school's L-shaped building. This addition will be three-stories in height, with one-story being below grade; BDS staff found, and the Hearings Officer agreed, that given its location and limited height, this addition will not be visible from residential properties south and west of the school. The City Council concurs with this observation. The three-story addition will be visible from immediate residential properties northeast and east of the school site, but a distance of some 380 feet will exist between the addition and the nearest residences. The record shows that this separation will mitigate visual impacts from the new internal improvements.

With the exception of a one-story, 640 square foot addition at the east end of the building, the remaining proposed floor area will be located on a second floor addition to the existing L-shaped building, facing both SE 24th Avenue and SE Stark Street. The brick-facing of the second-story addition will reflect the brick used on the street-facing facades of the existing building, with a window pattern that complements that on the existing building. Most of the second-story addition will be stepped back from the plane of the first-story wall, with the height of the second-story addition approximately 10 feet less than the maximum 50 foot height allowed for institutional buildings in single-dwelling residential zones. The Hearings Officer found, and the City Council concurs, that the use of comparable building materials, combined with the step back and limited height, mitigates visual impacts on the surrounding neighborhood and will make the second-story additions compatible with the residential area.

A portion of the second-story addition facing SE Stark Street will not be stepped back from the plane of the first-story building wall. Like the additions described above, the brick material of the second-story addition reflects that used on the first floor facade, with a window pattern that echoes that used on the first floor. These architectural features allow the addition to blend with the mass of the first story. Also, the length of this portion of the addition (approximately 115 feet) extends across only 25 percent of the entire SE Stark Street building facade, and instead of facing residential homes, it faces the Lone Fir Cemetery. Mature trees along the length of this frontage will help screen the addition. Since this addition faces away from the adjacent neighborhood, the City Council finds that it will not be incompatible with the surrounding residential area. A setback, landscaped at least to the L1 standard, with trees and groundcover, with a depth of approximately 15 feet along portions of SE Stark Street and ranging between approximately 13 and 21 feet along SE 24th Avenue, will help to further soften the building additions and minimize the contrast between this institutional use and nearby single family dwellings.

Regarding the proposed parking lot at the corner of SE 24th Avenue and SE Stark Street, the size of this lot will be limited to 15-spaces, with the east-west dimension of the paved area being only 36 feet in width. The lot will be buffered from the adjacent residential lots to the west by a five-foot deep setback area landscaped to the L3 standard. The L3 standard includes shrubs that will form a six-foot high continuous screen, as well as trees planted 15 feet to 30 feet on-center, depending on the species of tree planted. Landscaping to the L2 standard will be planted in a five-foot wide area along the SE Stark Street, SE 24th Avenue and SE Oak Street frontages. The L2 landscape standard is similar to the L3 standard, with the exception of a continuous three-foot high hedge instead of the six-foot high hedge. Additional landscaping will be provided within the interior of the parking lot. Meeting the minimum interior parking lot landscape standards will require the planting of between four and eight trees (depending on the size of the trees) as well as 23 shrubs. Street trees will also be required along all three adjacent street frontages. BDS staff found, and the Hearings Officer agreed, that the setback and extensive landscaping required for the parking lot will substantially mitigate for the difference in appearance between the parking lot and surrounding residential area. The City Council concurs with this conclusion.

At least one neighbor suggested that CCHS is already impacting the nature and feel of the neighborhood and that the additions will add to this undesirable effect (Exhibit H.22). The Hearings Officer appreciated that the school has many existing impacts on the neighborhood and the visual impacts represented by the size and architectural style are part of those impacts. However, the Hearings Officer noted that the question for this review is whether the new additions themselves are of such type and style as to represent a distinct negative impact. Due to the setbacks, landscaping and stepped back design of the majority of the building additions visible to the neighborhood, the Hearings Officer concludes, and the City Council agrees, that the proposal is likely to improve the school's appearance over its current appearance.

This criterion is met.

C. Livability. The proposal will not have significant adverse impacts on the livability of nearby residential zoned lands due to:

1. Noise, glare from lights, late-night operations, odors, and litter; and

Findings: Findings related to the above impacts are discussed below. However, there are several preliminary issues that must be addressed prior to discussing specific impacts.

The comments related to this criterion were abundant in both written testimony and oral testimony provided at the public hearings. The vast majority of the objections to the proposal actually relate to the school's existing ordinary operations and characteristics as a school. (See Exhibits H.4b, H.7, H.8, H.9, H.16, H.22, H.23, H.24, H.25, H.26.) The Hearings Officer noted that the neighborhood struggles with the impacts from the school's current operations. He found it entirely understandable that a daily influx of teenagers (and their parent drivers) into the neighborhood, combined with sporting and other events, increases the normal stresses on the adjacent residential area beyond what would occur in a neighborhood without a high school located within it. However, the existence of CCHS in the neighborhood is a longstanding fact.

The record shows that at every juncture along the school's development history, it has applied for and received the needed planning approvals. Those approvals allow the school to function as it does today, and to a large extent, the impacts identified and strongly objected to by the neighborhood are a consequence of this legally established entity.

The purpose of this review is not to attempt to remedy all of the negative impacts to the neighborhood that have accumulated over time. The Hearings Officer noted, and the City Council concurs, that this review is limited to determining whether the current proposal meets the Conditional Use Master Plan criteria set forth in the PCC and whether any impacts *caused by the proposal* are sufficiently mitigated so as not to decrease the livability of the surrounding residential area. The specific findings discussed below are properly limited to that question.

The opponents have raised two related complaints with regard to how the school conducts its operations and how it will conduct future operations once the improvements are completed. First, there is abundant testimony in the record alleging that CCHS has not honored its commitment to the two prior Good Neighbor Agreements, the 1987 Traffic and Parking Management Plan and the 2002 Implementation Plan. These agreements were rolled into the 2002 approval, LU 02-131397 CU AD, as conditions of approval. Second, the neighbors have asked for a mechanism by which they can better enforce those conditions as they claim that the current mechanism, which largely consists of a complaint hotline to the school and meetings between the school staff and the neighborhood, does not work.

It is very difficult to respond to the neighbors' charge that the school has not honored the Good Neighbor Agreements as the testimony on this subject is entirely anecdotal. Furthermore, many of the opponents wish to use these allegations as evidence that CCHS will not follow through on its current promises which are summarized in Exhibit A.7. This testimony is in stark contrast to BDS staff's findings that the conditions from the 1987 and 2002 agreements have been met. While the Hearings Officer did not doubt the veracity of those testifying, he found it nearly impossible to quantify in a meaningful way the type and frequency of the alleged failures. In addition, the Hearings Officer noted this review is not a code enforcement exercise and cannot substitute for one. Moreover, he found it would also be improper to deny the application based on allegations that CCHS will not adhere to any imposed conditions in the future, and the City Council concurs. There is simply no basis in the PCC for doing so.

One of the fundamental problems related to the above issues is that there is no record of code enforcement action related to the school. At the June 6, 2011 public hearing, the Hearings Officer asked BDS staff whether there were any code violation complaints in the record. Mr. Hardy responded that he had investigated the issue and found no code enforcement actions against the school other than a noise ordinance violation which is discussed below. The reason for the Hearing Officer's question was an attempt to both corroborate and quantify the opponents' testimony. The absence of code violation complaints in the record is significant because that is the formal mechanism for enforcing the conditions of approval in the 1987 and 2002 Good Neighbor Agreements. As conditions of prior land use approvals, the 1987 and 2002 agreements have the same force as provisions of the PCC. Failure to comply with conditions, if established through the proper enforcement procedures, is a

code violation and the City has authority to remedy the violation. A record of code enforcement activity related to CCHS could both quantify the neighbors' testimony and demonstrate a pattern or practice of the school not complying with past land use approvals. However, absent such a record, the Hearings Officer was reluctant to find that the school has failed to honor the two past agreements-or is unlikely to honor future agreements. The City Council concurs with this conclusion, and notes that all conditions of approval in this land use review, and previously approved land use reviews, are enforceable by BDS Compliance Services. BDS noted at the appeal hearing that complaints regarding violations of conditions of approval may be filed by the public with BDS Compliance Services by telephone (503.823.CODE) or via e-mail (www.portlandonline.com/bds).

The City Council also finds it noteworthy that opponents conceded in oral testimony at the appeal hearing that during normal school hours, Central Catholic High School adequately monitors and implements the parking limitations from the previous neighborhood agreements and conditions of approval. The problem, the opponents testified, was with after-school and non-school events. As found throughout this decision, the City Council finds that it is only the impacts *caused by the proposal* that are under consideration. The new surface parking lot will improve the livability of the neighborhood because with attended stacked parking, up to 35 vehicles can be parked in the lot for after-school and non-school events. BOORA Architect's depiction in Exhibit I.19 of the block face length that is required to park 35 vehicles on-street was particularly persuasive to the City Council because is clearly shows how the parking lot will provide some relief to existing on-street parking congestion, thereby improving the livability of the nearby residential lands.

Noise

BDS staff found that the proposal is limited to an expansion of floor area and a new surface parking lot. While the floor area increase will not be a generator of noise, use of the new parking lot could be a source of noise with school staff and students coming and going from their cars, and cars buses entering and exiting the lot. The applicant has proposed to address these potential impacts in a number of ways. The parking lot will accommodate only 15 spaces, which by itself limits the number of cars coming and going from the lot. Also, during school hours, the lot will be reserved for carpool spaces only, so the turnover in spaces during the daytime should be low.

Evening and weekend use of the parking lot associated with events also has the potential to disturb neighbors. To address this potential impact, CCHS has agreed that no school activities will extend beyond 10:00 p.m. (Exhibit A.7). The one exception to this would be two annual dances (a reduction of one dance per school year) which will be allowed to extend to 11:00 p.m. The school has pledged to employ chaperones and security personnel at these two events. This limit on the hours of operation better ensures that any noise associated with the use of the parking lot will not extend into late-night hours.

To further avoid potential impacts related to the use of the parking lot, the City Council finds that the parking lot be secured after-hours parking. To address this issue, the City Council includes an additional condition that the parking lot shall be secured from 11 pm until 6 am. If Central Catholic High School needs the parking lot during those hours, the lot shall be secured immediately following Central Catholic's use of the lot.

The Hearings Officer found, and the City Council agrees, that the 2002 Good Neighbor Agreement was intended to address many of the issues related to noise from cars and traffic. That plan imposes limitations on where students may park within the neighborhood, limiting the number of parking passes issued to students, establishing penalties for when students do not comply with parking requirements, assigning faculty members to supervise student parking at key locations in the morning and afternoon periods, and promoting alternatives to single-occupant vehicles, such as carpooling, biking, and taking public transit. For after-school events, the agreement includes measures that are intended to reduce the impact of these events on the surrounding residential neighborhood such as limiting the number of large events that attract large crowds, educating CCHS families and guests on where to park, posting portable signs directing attendees where to park, and hiring security personnel to patrol the area during larger events.

CCHS is proposing additional measures under the current review that supplement the 1987 Traffic and Parking Management Plan and 2002 Implementation Plan. These additional strategies are included the 2011 Traffic and Parking Mitigation Measures Plan (Exhibit A.7). As previously mentioned, this plan includes such measures as improvements in the public right-of-way that will improve traffic flow, pick-up and drop-off, and pedestrian circulation; bus loading and unloading; increasing parking supply; further promoting carpooling and alternative modes of transportation; and additional event management personnel; and decreasing the number of events that occur on campus. The Hearings Officer found, and the City Council agrees, that the combined measures identified in the 1987 and 2002 Good Neighbor Agreements and those proposed in Exhibit A.7 will mitigate noise impacts related to the proposed school expansion and impacts from the proposed parking lot.

Two additional issues raised at the June 6, 2011 public hearing and written testimony need to be addressed. First, at least one neighbor testified that the school's current HVAC system is loud and cycles on and off in a way that is annoying to nearby neighbors. Testimony was also offered at that hearing related to a code enforcement action for a noise violation connected with the HVAC system in 2006 (See also Exhibit H.-11). Laura Jaeger from CCHS testified that since that time, baffling has been installed to reduce the sound levels caused by the HVAC system. The record shows that the noise violation was remedied. While the neighbors speculate that with the school expansion the HVAC system may once again become a nuisance because of increased demands on the system, there is no evidence to suggest that will necessarily occur. The applicant provided testimony which stated that there is no current noise-related violation associated with the HVAC system (Exhibit H.20). There is no other evidence in the record to suggest that the current HVAC system is or will be in violation of the City's noise ordinance. Absent a documented and ongoing pattern of noise complaints and violations associated with the HVAC system, City Council cannot find that noise associated with the HVAC system will be so severe as to warrant a denial of the application.

The second issue is noise associated with buses idling on Pine Street on the north side of the school (Exhibit H.7). Many neighbors testified that this in a regular and ongoing problem creating both noise and odors. The applicant appears to acknowledge this problem and has proposed to move the staging area for buses to the proposed parking lot. The applicant has proposed to "[r]emove bus loading/unloading functions from the street, to be relocated to

timed bus zones within the drive lane of the west parking lot" (Exhibit A.7). The neighbors questioned whether there will be enough room to accomplish this in the new parking lot. However, both the Hearings Officer's conclusions and the record indicate that staging buses in the proposed parking lot will be feasible.

The new bus staging area will likely reduce the impact of bus noise by moving it to an area that provides some buffering to the neighborhood. However, the Hearings Officer agreed with the neighbors' concerns about the amount of time, up to 30 minutes at a time, that buses are currently left idling. The applicant did not address why such long idling times were necessary, but offered testimony that bus drivers would be notified to not allow buses to idle.

The Hearings Officer found, and Council concurs, that long idling times have the potential to significantly impact the livability of the neighborhood. Therefore, bus idling times should be limited to the least amount of time "practicable" as that term is defined in the PCC. The Hearings Officer also found, and the City Council agrees, that the determination of whether bus idling is needed or practicable should not depend on the convenience or comfort of the bus operator or policies of the bus service provider. Turning the bus off should be the operators' first option. The additional conditions identified in Exhibit A.7 shall be construed consistent with this finding.

Glare from Lights

The Hearings Officer found, and the City Council agrees, that no adverse impacts on the neighborhood are likely from required lighting or with glare from lights. The athletic field is not currently lit, and the current Conditional Use request does not include a proposal to light the field. Exterior lighting on the building and elsewhere on the site, including lighting of the new parking lot, will be required to meet the glare standards of Chapter 33.262, Off-Site Impacts, and therefore will not cause significant adverse impacts on the area. Regarding the parking lot, the required perimeter and interior landscaping (which include trees and shrubs) and the required street trees on all three frontages will substantially mitigate potential light glare from this facility.

Late Night Operations

BDS staff correctly noted that the PCC does not prescribe guidance in the Conditional Use approval criteria or elsewhere on the issue of evening and late night functions related to the school. The school has proposed to hold just two dances that extend to 11:00 pm - which is a reduction of one dance per year from current levels (Exhibit A.7). All other events and activities on campus will cease by 10:00 p.m. The school has indicated security personnel will be employed to control noise and any other violations during and after the dances. Given the infrequency of the dance events, the Hearings Officer found that allowing the school to hold the two dances until 11:00 p.m. will not have a significant negative impact on the adjacent residential neighborhood. The additional condition that requires the new parking lot be closed between the hours of 11 pm to 6 am, but if Central Catholic High School needs the parking lot during those hours, the lot shall be secured immediately following Central Catholic's use of the lot.

Odors

The Hearings Officer found, and the City Council agrees, that the proposal to expand the floor area of the school and to construct a new parking lot will not generate odors. However, as discussed above, several residents, particularly those living on SE Pine Street, commented on exhaust fumes coming from

buses associated with school activities idling on this street. As indicated in the applicant's 2011 Traffic and Parking Mitigation Measures Plan, no buses will be allowed to idle (or load and unload) on SE Pine Street, or on other public streets (Exhibit A.7). Instead, these buses will load and unload at the new parking lot. As discussed in the findings above, the buses must also limit idling to the least amount of time practicable. With this condition on bus operations, any significant impact cause by the exhaust odors will be mitigated.

Litter
The Hearings Officer found, and the City Council agrees, that the proposed floor area additions and new parking lot will have no impact on the amount of litter in the area. CCHS has stated that it will continue its current policy of patrolling school property daily to remove litter.

Cumulative Impacts
At least one neighbor suggested that the cumulative impacts of all of the identified impacts taken as a whole will have a significant negative impact on the neighborhood (Exhibit H.23). The Conditional Use review criteria do not require consideration of cumulative impacts. The Hearings Officer agreed that in some circumstances, the accumulation of several minor impacts could result in overall negative impacts that could be deemed significant under this criterion. However, both the Hearings Officer and the City Council find that is not the case here. The limited nature of the current proposal and the past and present mitigation measures in the 1987 and 2002 Good Neighbor Agreements and the 2011 Traffic and Parking Mitigation Measures Plan adequately address all the potential significant impacts to the neighborhood.

2. Privacy and safety issues.

Findings: The Hearings Officer found, and the City Council agrees, that the current proposal does not represent additional impacts on privacy and safety beyond those currently associated with the school. BDS staff found that the full block campus is separated from adjoining residential uses by public rights-of-way, ranging in width from approximately 46 feet to 60 feet, with (existing or proposed) street trees along all these frontages. The width of the right-of-way, in combination with the street trees, maintains adequate privacy for adjacent homeowners. Additionally, the second-story additions proposed on the building will face either CCHS owned property (across SE 24th Avenue) or the cemetery (across SE Stark Street). The largest of the proposed additions, on the east side of the existing school building, will be internal to the campus and face the athletic field.

The record shows that privacy issues associated with the new parking lot are not reasonably anticipated. The parking lot is surrounded by streets on three sides, with the right-of-way ranging in width from approximately 46 feet to 66 feet. Street trees will be required along all three frontages. The west side of the lot will abut two residentially-zoned properties. These two properties will be buffered from the parking lot by a five-foot deep landscape area planted with six-foot high shrubs and trees planted between 15 and 30 feet on-center. This landscaping will provide screening and some sound buffering to retain the privacy in the adjoining residential area.

Many neighbors commented both in writing and at the two hearings on the issue of traffic safety. Several neighbors complained of reckless driving, speeding, and blockage of streets by cars and buses during pick-up and drop-

off times. The applicant appears to acknowledge that there is ongoing potential for reductions in traffic safety due to the fact that many of the drivers are teenagers. In his decision, the Hearings Officer sympathized with the neighbors' concerns and understood that witnessing the daily spectacle of drop-off and pick-up of students may appear to be barely controlled chaos. However, the Hearings Officer concluded, and the City Council concurs, that data in the record regarding actual auto accident rates at SE 24th and Stark Street and SE 26th and Stark Street show that conditions near the school have not been abnormally unsafe (Exhibit H.18).

More importantly, as BDS staff noted, these issues are related to the *existing* school use, and are not expected to be exacerbated by the proposed school expansion, as the expansion itself will not result in a significant increase in enrollment over current and historic levels. The Hearings Officer found, and the City Council concurs, that additional measures that the applicant has proposed in the 2011 Traffic and Parking Mitigation Measures Plan and the proposed widening of SE 24th Avenue will very likely result in improved traffic safety conditions over existing conditions. This criterion is met.

D. Public services.

1. The proposed use is in conformance with either the Arterial Streets Classification Policy or the Downtown Parking and Circulation Policy, depending upon location;

2. The transportation system is capable of safely supporting the proposed use in addition to the existing uses in the area. Evaluation factors include street capacity and level of service, access to arterials, transit availability, on-street parking impacts, access requirements, neighborhood impacts, and pedestrian safety;

Findings: PBOT/Development Review reviewed the application for its potential impacts regarding the public right-of-way, traffic impacts and conformance with adopted policies, street designations, Title 33, Title 17, and for potential impacts upon transportation services. This included a review of the applicant's Traffic Impact Study and TDM Plan, prepared by Lancaster Engineering and dated February 14, 2011. A summary of the recommendations included in that document are identified below, followed by the comments and recommendations from PBOT.

Recommendations Included in the Applicant's Traffic Impact Study and TDM Plan
Based on the results and findings of the Traffic Impact Study, the Parking Impact Study, and the TDM Plan, the following recommendations were made:

Traffic Circulation and Time-Restricted Parking
- Widen SE 24th Avenue to 34 feet (curb-to-curb) between SE Stark Street and SE Pine Street.
- Remove the 7:00 a.m. – 9:00 a.m. no on-street parking restriction from the north side of SE Stark Street, east of SE 26th Avenue. Install time-restricted parking for use during school pick-up and drop-off times.
- Remove the 15-minute parking zone on the north side of SE Stark Street at SE 24th Avenue and one-hour parking zone on the east side of SE 24th Avenue and install the following:

- "5-Minute Driver Remain at Wheel 7:30-8:30 AM and 2:00-3:00 PM School Days Only" signing on the north side of SE Stark Street for 100 feet east of SE 24th Avenue, 100 feet west of SE 26th Avenue, and 50 feet east of SE 26th Avenue; and
- Install one-hour parking for the first 100 feet on the east side of SE 24th Avenue north of SE Stark Street (currently signed for 65 feet).

Parking Supply

- Construct 15-space parking lot on vacant CCHS-owned property on the west side of SE 24th Avenue between SE Stark Street and SE Oak Street.
- Reconfigure on-street parking on the west side of SE 26th Avenue south of SE Stark Street to allow head-in diagonal parking.

Pedestrian Safety

- Construct curb extensions on both the north and south sides of SE Stark Street at the intersection with SE 26th Avenue to facilitate pedestrian crossings on the west side of the intersection. Install an appropriately marked and signed school crossing.
- Construct a curb extension on the south side of SE Stark Street at the existing school crossing at SE 24th Avenue.

TDM Plan

- Strengthen current carpool program to more aggressively match students and staff with similar travel routes and school schedules. Dedicate parking in new west lot to carpools with three or more occupants.
- Engage the SmartTrips program operated by the City of Portland to further encourage the use of alternative modes of transportation.
- Increase on-site bike parking to meet City of Portland requirements, for a total of 128 on-site spaces. This nearly triples the number of on-site bike parking spaces above the current 44 spaces.

Parking Demand Management

- Continue use of school staff at the intersections of SE 24th Avenue and SE 26th Avenues with SE Stark Street to observe and assist with morning student parking and drop off activities.
- Establish school-wide parking initiative to increase awareness and minimize neighborhood impacts.
- Increase enforcement and improve compliance with existing parking permit program OR participate with the neighborhood in the formation of an Area Parking Permit program administered and enforced by the City of Portland. Preliminary discussions have taken place between CCHS, the neighbors, and the City of Portland regarding establishment of an Area Parking Permit program. Should a program be established, the parking management strategies discussed for both daytime and event activities will be reconsidered by CCHS, the Buckman Community Association, and immediate neighbors of CCHS.

Event Transportation and Parking Management

- Continue efforts to inform guests and visitors of preferred parking areas prior to the event.
- Post portable changeable message signs to direct drivers to appropriate parking areas and/or inform drivers when parking areas are full.
- For large events, provide the following:

1. Parking guidance staff or volunteers to direct drivers to appropriate areas.
2. Parking personnel to implement stacked parking on the new west lot.

PBOT Summary of Issues and Recommendations
The proposed construction of the 15-space parking lot and the striping of SE 26th Avenue south of SE Stark Street for angled parking will result in a net increase of eight parking spaces. This modest increase of available parking will not solve parking congestion in the area of CCHS. While the traffic study documents that the street system has adequate capacity for vehicle movements and that on-street parking is available during normal daytime school hours, there are measures CCHS can take to reduce their current impact on the neighborhood. PBOT recommends several conditions of approval (detailed below) that are intended to reduce the amount of congestion on SE 24th Avenue during student pick-up and drop-off, enhance pedestrian crossings at SE Stark Street, update the TDM Plan, provide additional on-street angled parking, and better manage parking and traffic impacts on adjacent streets.

PBOT also recommended a condition of approval that addresses the number of non-school related activities and events. While the traffic study found that the transportation system has adequate capacity for both school and non-school related activities, the impacts on neighborhood livability could be further reduced by reducing the traffic and parking demand associated with non-school related uses at CCHS. The school is cognizant of this issue, and has proposed eliminating or reducing the frequency of many events (both school and non-school related) that occur on the campus. The events that will be discontinued or reduced in frequency are listed in the applicant's 2011 Traffic and Parking Mitigation Measures document (Exhibit A.7). PBOT recommended a condition of approval that requires CCHS to abide by the measures included this document.

With the exception of the widening of SE 24th Avenue between SE Stark and SE Pine Streets, and the curb extensions on SE Stark Street, all other above recommendations for the public right-of-way that are included in the Lancaster Engineering report propose modifying how the right-of-way operates. These include restrictions on the location and timing of on-street parking, marked pedestrian crossings, location of on-street loading spaces, and the location and design of angled parking, which are all beyond the authority of Title 33 (Zoning Code) to impose specific conditions of approval. CCHS has submitted a separate Public Works Inquiry application to determine the feasibility and potential for approval from PBOT. Engineered plans have not been submitted at this time. Based on the initial inquiry, PBOT found that the requests can be approved. However, PBOT noted the final decision of the proposed changes to right-of-way operations will be determined during the review of the Public Works permit. PBOT conditions of approval requiring CCHS to apply for the necessary approvals within specific timelines are as follows:

PBOT recommends approval of the proposed Conditional Use Master Plan with the following conditions:

- CCHS shall apply for a Public Works permit to request approval to widen SE 24th Avenue along the school's frontage by four feet, and must complete the widening prior to the beginning of the fall 2012 school year. The widening of SE 24th Avenue will also require a seven-foot dedication along the school's frontage on the east side, and a

three-foot dedication along the school's frontage on the west side to provide sidewalk corridors that meet current 11-foot City standards. The dedications and a financial guarantee will be conditions of building permit approval.

- CCHS shall construct the 15-space parking lot at the northwest corner of SE 24th Avenue and SE Stark Street prior to the loss of any existing on-site parking. The parking lot must be reserved for carpool use, with vehicles having a minimum of three passengers.
- CCHS shall apply for a Public Works permit to request approval for curb extensions on the north and south side of SE Stark Street at SE 26th Avenue, and on the north side of SE Stark Street at SE 24th Avenue; the construction of these curb extensions must be completed prior to the beginning of the fall 2012 school year.
- The loading and unloading of buses used for school events shall be limited to the drive aisle in the 15-space parking lot at the northwest corner of SE 24th Avenue and SE Stark Street.
- CCHS shall apply for a Public Works permit to request permission to widen the sidewalk on the west side of SE 26th Avenue (between SE Stark Street and SE Morrison Street) and construct angled parking along this frontage. If approved by PBOT, the sidewalk widening and angled parking must be completed prior to the beginning of the fall 2012 school year.
- Prior to building permit approval for any project approved under this Master Plan, CCHS shall submit to PBOT a separate updated TDM Plan document that includes the items related to strengthening the carpool program, engaging with the City of Portland's Smart Trips program, and increasing on-site bike parking to more than the minimum required 128 spaces.

The Hearings Officer concurred, as does the City Council, with the findings of PBOT/Development Review and the recommended conditions are addressed below.

Two additional issues needed to be addressed with regard to parking and traffic safety. First, several neighbors questioned the wisdom of moving the entrance on SE 24th Avenue to a location closer to SE Stark Street. They claimed that the move will not decrease the traffic congestion that is caused by having any entrance near the SE 24th and SE Pine Street intersection. The applicant provided a response which clarifies that the 24th entrance will become "exit only" under the recommended conditions of approval and that by moving the entrance to its proposed location will allow for additional landscape screening to be installed directly across the street from existing residences to reduce visual impacts from the school (Exhibit H.32). The Hearings Officer found, and the City Council agrees, that the proposal to move the entrance on 24th Avenue is likely to reduce both traffic impacts and visual impacts on the neighborhood. The conditions imposed in Exhibit A.7 will ensure that the new entrance and the "exit only" access on 24th Avenue are used in a manner consistent with the applicant's explanation at the public hearing.

Second, many neighbors at the June 6, 2011 hearing expressed the desire for the school to build an on or off-site parking garage. The 2002 Good Neighbor Agreement required the applicant to explore that option. The record shows that CCHS did explore that option and decided not to

pursue it based on cost and potential queuing problems during heavy use periods. The Hearings Officer asked all parties at the June 6, 2011 public hearing whether the PCC contained any criteria that required the applicant to build a parking garage. The consensus answer at both that hearing and in subsequent written submissions was "no." The Hearings Officer found, and the City Council concurs, that none of PCC criteria applicable to this application require the school to build a parking garage to address the parking stresses around the school and neighborhood. Even if the code criteria were more stringent, the fact that the surrounding neighborhood parking capacity is between 64-81 percent indicates that there is sufficient parking available while the school is in session. With between 36-19 percent of the available spaces still unused on a daily basis, it would be difficult to justify imposing a condition requiring the school to build a parking garage, and both the Hearings Officer and the City Council decline to do so.

Based on these findings and with the recommended conditions of approval, this criterion is met.

2. Public services for water supply, police and fire protection are capable of serving the proposed use and proposed sanitary waste disposal and stormwater disposal systems are acceptable to the Bureau of Environmental Services.

Findings: BDS staff made the following findings with regard to public services. The Hearings Officer had no objections to these findings. The City Council adopts these findings.

Water Supply
The Bureau of Water Works reviewed the proposal and has no objections to the requested land use reviews (Exhibit E.4). The Water Bureau noted that there are four existing water services providing water to the site, three of which are 2-inch metered service, and one of which is a 4-inch fire service. These services are provided to the site via a 16-inch water main in SE Pine Street, with an estimated static water pressure ranging from 52 psi to 65 psi. New building additions and remodels must have a water service and meter of an appropriate size installed within the public right-of-way and within the specific property boundary for which it will serve. At time of building permit, the Water Bureau will review for fixture count, as well as required fire flow amount, in order to determine the appropriate service and or meter size for the site.

Police Protection
The Bureau of Police reviewed the proposal and determined they are capable of serving the proposed use (Exhibit E.6).

Fire Protection
The Fire Bureau has no objections with the proposal and noted that all current Fire Code requirements are required to be met at time of building permit review, unless an appeal is granted (Exhibit E.5). A separate building permit is required is required for all proposed work.

Sanitary Waste Disposal and Stormwater Disposal
BES reviewed the proposal and has no objections to the requested land use reviews (Exhibit E.2). Existing sanitary service can be provided from sewers located in all four streets abutting the site. While the combined sewer currently

surcharges under certain conditions, BES will allow sanitary connections but stormwater discharges will be restricted. BES notes that there is no public storm-only sewer available to the property, and that all development and redevelopment proposals are subject to the City's Stormwater Management Manual. BES has reviewed the applicant's stormwater report and determined that the proposed stormwater management plan, including stormwater planters both on private property and in the public right-of-way, is feasible.

In summary, there are adequate public services to serve the proposed development, and this criterion is met.

E. Area plans. The proposal is consistent with any area plans adopted by the City Council such as neighborhood or urban renewal plans.

Findings: The site is located within the boundaries of the Buckman Neighborhood Plan, adopted by City Council in July 1991. Applicable policies from the plan are discussed below.

Policy 1. Maintain and improve the quality and urban character of Buckman's physical environment and attract compatible development.

Objective 1.3. Develop and enhance Buckman's pedestrian environment.

Comment: As part of the proposed widening of SE 24th Avenue, CCHS will be providing a new 6-foot wide sidewalk along the east side of this street (from SE Stark Street to SE Pine Street), and along the west side between SE Stark Street and SE Oak Street. New street trees are proposed along the length of both these frontages. Additionally, curb extensions are proposed along SE Stark Street at SE 24th and SE 26th Avenues to enhance pedestrian movement south of the site.

Objective 1.5. Encourage new development and renovation of existing structures to meet Buckman commercial and residential architectural guidelines.

Comment: The Buckman Design Guidelines address both building and site conditions. Regarding buildings, while there are no specific guidelines for institutional development, guidelines for commercial development call for additions and alterations that adopt the character of the existing building, and that are minimally visible. Additionally, buildings should not exceed 45 feet in height, with exterior material being stucco, brick or horizontal wood siding. The siding should match the predominant material of the original structure, and blank facades should be minimized.

The Hearings Officer found, and the City Council agrees, that the proposed building additions to the CCHS campus meet all these guidelines. The additions on the street-facing facades will be clad in brick, which matches the material of the existing building, and heavily fenestrated in a pattern that reflects that of the lower stories. The building will be less than 45 feet in height, with much of the second-story addition set back from the face of the lower stories, thereby minimizing its appearance. The largest of the additions will be essentially behind the existing building and set back more than 350 feet from the nearest residences.

Objective 1.6. Support planning and design of new developments that enhance neighborhood livability.

This objective calls for bringing proposals for new development to the community early in the development process to allow for comments and to discuss potential impacts. While CCHS technically is not proposing new development, but instead proposes alterations to existing development, the school has reached out to the neighborhood early in this review process. The record shows that meetings with the neighborhood on the proposed Conditional Use Master Plan began in January 2010, with 11 subsequent meetings and extensive additional communication with neighborhood representatives. A number of changes to the applicant's original plan resulted from those meetings.

Policy 2. Housing

Objective 2.8. Discourage demolition of residentially zoned housing for purposes of providing surface parking.

Comment: CCHS is proposing the development of a new 15-space surface parking lot on two residentially zoned lots that are currently outside the school's Conditional Use boundaries. While these two lots are residentially zoned, they are owned by CCHS, and have been vacant for more than 25 years. The Hearings Officer found, and the City Council agrees, that because the lots are in the ownership of CCHS, and vacant, the likelihood that they will be developed for single-dwelling purposes in the future is limited. Redeveloping these two small vacant lots with a parking area that will be heavily screened with landscaping is one way to address the longstanding parking issues that have been raised by area residents.

CCHS also owns three additional residentially zoned properties west of the proposed parking lot. Each of these lots is currently developed with a single-dwelling residence. These three lots are not included in the proposed Master Plan boundary expansion, and there are no plans to demolish these three houses.

Policy 4. Safety and Community.

Objective 4.9. Encourage schools, churches and business groups to sponsor or assist in organizing activities that serve Buckman residents.

Comment: The record shows that CCHS and its students are involved in a number of community activities, including regularly volunteering at the St. Francis Dining Hall, tutoring at Buckman Elementary School, volunteering at the Laurelhurst Village retirement home, running an annual food drive with neighbor participation, volunteering for the annual neighborhood clean-up day, and care of the Lone Fir Cemetery. The school's performing arts events are also open to the public.

Policy 5. Transportation. Maintain mobility through alternative forms of transportation and reduce the impact of auto and truck use in Buckman.

Objective 5.1: Control neighborhood traffic and parking to ensure safety and livability for neighborhood residents.

Objective 5.2: Encourage alternatives to automobile use.

Comment: The impacts on traffic and parking in the neighborhood are discussed in detail in Section C, above. Most of the identified impacts are associated with the schools existing operations, not the current proposal. BDS staff correctly notes that the proposed expansion of the school is not expected to increase enrollment levels beyond the 800-850 level, with no increase in the number of after school events. The new 15-space parking lot and the school's pledge to assist in developing angle parking on SE 26th Avenue adjacent to the cemetery are measures that are likely to improve the traffic and parking conditions in the neighborhood. The school has committed to continue honoring and implementing the 1987 and 2002 Good Neighbor Agreements and take the additional measures identified in the 2011 Mitigation Plan (Exhibit A.7). Included in these measures are significant improvements in the public right-of-way that will facilitate traffic and pedestrian movement, as well as provide additional parking and drop-off/pick-up opportunities. These measures adequately address the objectives set forth in Policy 5.

Policy 6. Educational, Recreation, and Cultural Resources. Promote and improve educational, recreational and cultural resources and activities in the Buckman neighborhood.

Objective 6.1: Strengthen interaction between the schools and the community.

Objective 6.2: Advocate strengthening school programs that enhance personal development, neighborhood identity and livability.

Objective 6.5: Promote strategies to maximize neighborhood use of school facilities and programs.

Objective 6.8: Support the use of school buildings for community recreational and cultural activities.

Comment: The Hearings Officer found, and the City Council agrees, that CCHS is an educational, recreational and cultural resource that has been part of the Buckman neighborhood for over 70 years. The proposed expansion will improve the school's facilities, thereby enhancing this resource. The school has been an active member of the neighborhood association and offers use of its facilities to the community.

The proposal is supportive of this policy.

Policy 8, Social Services and Institutional Uses. Ensure that social service agencies and institutions, which provide needed services to the neighborhood and the broader community, do not cause adverse impacts.

Objective 8.2: Foster better communication among neighbors and social service organizations and institutions.
Objective 8.5: Discourage the expansion of existing or new institutional uses which increase traffic, reduce on-street parking, or cause a loss of housing.

Objective 8.7: Encourage solutions to parking and traffic problems associated with institutional uses.

Comment: The Hearings Officer found, and the City Council agrees, that CCHS is an established institution, which has existed at its present location for more than 70 years. The proposed building expansion is not anticipated to increase traffic or reduce on-street parking beyond the present situation, and will not result in a loss of existing housing. In recognition of ongoing transportation and parking issues, CCHS is committed to honoring the 1987 Parking and Traffic Management Plan, and the 2002 Implementation Plan. The school is proposing significant new measures, including public right-of-way improvements, that are intended to further address traffic and parking issues. The proposal is supportive of this policy.

33.805 Adjustments

33.805.010 Purpose
The regulations of the zoning code are designed to implement the goals and policies of the Comprehensive Plan. These regulations apply city-wide, but because of the city's diversity, some sites are difficult to develop in compliance with the regulations. The adjustment review process provides a mechanism by which the regulations in the zoning code may be modified if the proposed development continues to meet the intended purpose of those regulations. Adjustments may also be used when strict application of the zoning code's regulations would preclude all use of a site. Adjustment reviews provide flexibility for unusual situations and allow for alternative ways to meet the purposes of the code, while allowing the zoning code to continue to provide certainty and rapid processing for land use applications.

33.805.040 Approval Criteria
Adjustment requests will be approved if the review body finds that the applicant has shown that approval criteria A. through F., below, have been met.

A. Granting the adjustment will equally or better meet the purpose of the regulation to be modified; and

Findings: The applicant requests four Adjustments to the Single-Dwelling zones institutional development standards related to the proposed expansion of the school. The institutional development standards are contained in Section 33.110.245 of the Zoning Code. The purpose for these standards, as stated in Section 33.110.245.A, is as follows:

The general base zone development standards are designed for residential buildings. Different development standards are needed for institutional uses which may be allowed in single-dwelling zones. The intent is to maintain compatibility with and limit negative impacts on surrounding residential areas.

Maximum FAR
The applicant requests an Adjustment to increase the maximum allowed FAR from 0.56:1 to 0.68:1 to allow for the proposed building additions. (In 2002, CCHS received approval of an Adjustment review through LU 02-131397 CU AD to increase the allowed FAR from 0.50:1 to 0.56:1.) In addition to the purpose statement identified above, the intent of limiting maximum FAR in the Zoning Code is to control the overall density of development on a site. The FAR limit works with height, setback, and building coverage standards to control the bulk of buildings.

The Hearings Officer found, and the City Council agrees, that the request to increase the FAR by 0.12:1 equally meets the stated purpose of the floor area regulation. The most prominent facades of the school, closest to SE 24th Avenue and SE Stark Street, will remain low in scale and bulk. Along these two facades, the increased floor area is accommodated in a second-story addition that is largely stepped back from the face of the existing first-story building wall. The overall height of the resulting building will still be less than the maximum 50 feet allowed by the institutional development standards in single-dwelling zones, with buildings covering less of the site (41 percent) than the maximum (50 percent) allowed by the base zone regulations. Where the second-story addition is not stepped back (along a portion of SE Stark Street), the length of the addition is limited to only a small fraction of the overall length of building wall along this frontage. Also, this addition will face a cemetery as opposed to single-dwelling residences. The largest floor area addition is located to the rear (east) of the existing L-shaped building. This addition, at 29,000 square feet and a full-two-stories in height (with an additional story below grade), will not be visible from residences to the west and northwest of the school, or from the site's SE Stark Street frontage. The substantial setback between this addition and residences to the east and northeast of the campus, in excess of 350 feet, visually reduces the mass of the building addition and helps maintain compatibility with surrounding residential uses. The additions also will be compatible with the existing building in terms of materials and design.

As explained above, the increased floor area will not substantially increase the intensity of the existing school use. The student enrollment will be maintained at the 800 to 850 level, with an increase in only one classroom. The remaining new floor area will be devoted to supporting functions.

For all these reasons, the Hearings Officer found, and the City Council agrees, that the requested Adjustment of the FAR from 0.56:1 to 0.68:1 will equally or better meet the purpose of the floor area ratio regulations.

Minimum Building Setbacks

The applicant requests an Adjustment to reduce the minimum required setback for portions of the building along the site's SE 24th Avenue frontage and SE Stark Street frontage. The setback Adjustment along SE Stark Street will reduce the minimum setback for a 2,000 square foot, 115-foot long second-story addition from 12 feet to 0 feet. The 12-foot setback was established as part of a previous land use decision (CU 112-90) for building additions along this frontage. However, the proposed second-story addition will be constructed over a portion of the existing building that is already built to the street lot line.

Along SE 24th Avenue, the applicant requests reducing the minimum building setback for portions of the building wall from 15 feet to 6 feet, 6-inches. With the exception of a relocated trash enclosure, this request is not the result of any new development along this frontage. The reduced setback is the result of the proposed widening of SE 24th Avenue, which will move the property line seven feet east from its existing location. The requested 6 foot, 6-inch setback applies only to the relocated trash enclosure. The remainder of the existing building walls along this frontage will range from 6 feet, 8-inches for the wall of the gym, to 12 feet, 9-inches for the Oak Street entrance, and 21 feet, 7-inches for the remainder of the building wall. (Note: The northern-most portion of the gym wall, at the northwest corner of the building, currently has a setback of

zero feet due the existing right-of-way jogging east toward the site. This setback was approved under CU 99-85.)

In addition to the purpose statement for institutional development standards, stated above, the minimum building setback regulations in residential zones are intended to maintain light, air, separation for fire protection, and access for fire protection. The setback regulations help maintain the general building scale and placement, and ensure privacy for adjacent residents.

The Hearings Officer found, and the City Council concurs, that the requested Adjustments will equally meet the purpose for requiring minimum setbacks, for the following reasons:

- For the request to reduce the minimum setback along the SE Stark Street frontage, the requested zero foot setback for the proposed second-story addition is limited to the portion of the building wall that is already at a zero foot setback. This addition will be limited in size, 2000 square feet, and will be 115 feet in length, or approximately 25 percent of the entire length of the building facade facing SE Stark Street. Because this addition faces a public right-of-way, approximately 66 feet in width, with a cemetery on the opposite side of the street, there are no impacts on maintaining light, air, separation for fire protection, and access for fire protection. Additionally, mature streets trees, taller than the proposed addition, will help screen views of the addition.

- Along the SE 24th Avenue frontage, with the exception of the relocated trash enclosure, the reduced setback is not the result of new buildings or additions, but the result of moving the street lot line closer to the existing building wall. As such, there is no change in the relation (or distance) between the campus buildings and the residential homes on the west side of SE 24th Avenue. Because of this, there will be no impact on maintaining light, air, separation for fire protection, and access for fire protection. Written responses from some neighbors pointed to the impact of the increased building height along this frontage in combination with the reduced setback. The second-story addition will be limited to the portion of the building that is already set back in excess of 21 feet from the new street lot line, with the addition stepped back from the face of the first story wall. As such, the second-story will be beyond the minimum required building setback. Also, as required by the institutional development standards, the area between the building wall and the public sidewalk will be required to be landscaped at minimum to the L1 standard (i.e. trees and groundcover). Street trees will also be required along both frontages of the site along SE 24th Avenue.

- The relocated trash enclosure will be within 6 feet, 6-inches of the sidewalk. This replaces an existing trash enclosure that is located farther north along this frontage, closer to single-dwelling residences. The existing trash enclosure is also in the front setback area, approximately six to seven feet back from the property line. The applicant proposes relocating the trash enclosure farther south on this frontage, away from residents, in a location across the street from the proposed 15-space parking lot. Unlike the existing trash enclosure, which is screened only with a chain link fence with slats and barbed wire, the applicant indicates the proposed enclosure will be screened with materials that reflect that used on the building, such as brick and ornamental iron. Consistent with this intent, and to ensure the

trash enclosure is compatible and blends with the design of the adjacent school building, BDS staff recommends a condition of approval that with the exception of a fully-sight-obscuring access gate (meeting the F2 screening standard), the enclosure shall be clad in a brick material that replicates that used on the adjacent building facade.

The Hearings Officer found, and the City Council agrees, that as proposed, and with the condition of approval, this criterion is met.

Buffering Across a Street From a Residential Zone
Because of the widening of SE 24th Avenue, the depth of the required landscape buffer along this frontage will be reduced to less than the required 15 feet of L1 landscaping. (A previous land use approval waived the landscape buffer for the northern-most portion of the wall facing SE 24th Avenue, which is already built to the street lot line.) As noted above, the landscaped buffer is being reduced in depth not because development will be coming closer to the street lot line, but because the widening of SE 24th Avenue will be bringing the street lot line seven feet closer to the existing building wall. The reduced landscape buffer will range in depth from 6 feet, 8-inches in front of the gym, to 12 feet, 9-inches in front of the Oak Street entrance, and exist along only a portion (approximately one-third) of this frontage. The remaining two-thirds of the landscape buffer along this frontage will be 21 feet, 7-inches in depth. As such, the majority of this frontage will meet the minimum landscape buffer, and be landscaped at least to the L1 standard. As indicated on the applicant's site plan (Exhibit C.2), the portion of the landscape buffer that is less than the minimum required depth will be landscaped to the L2 standard, which will exceed the minimum required L1 landscape standard.

As proposed, the criterion is met for the Adjustment to required buffering across a street from a residential zone.

Minimum Landscaped Area
The applicant requests an Adjustment to reduce the required minimum landscaped area from 10 percent of the site area to 8.5 percent of the site area. (An Adjustment was approved in 2002, LU 02-131397 CU AD, to reduce this standard from 25 percent of the site to 10 percent of the site.) The approved 10 percent standard would require 23,842 square feet of the total site to be landscaped to the L1 standard. With the requested Adjustment to 8.5 percent, 20,265 square feet of the site will be landscaped at least to the L1 standard. Part of the reduction in the landscaped area approved in 2002 is the result of the proposed widening of SE 24th Avenue.

In addition to the purpose of the institutional development standards stated above, landscape standards are intended to help soften the effects of built and paved areas on a site, and help reduce stormwater runoff. The Adjustment request is found to equally meet the intent of the regulations. Even with the requested Adjustment, over 44 percent of the entire site will be in open area, including landscaped areas and the athletic field. While the athletic field, which covers just over 30 percent of the site, serves as an open space amenity that provides relief from built and paved areas, it cannot be included in the site's landscaped area, as it is not landscaped to the L1 standard. The 8.5 percent of the site that will be in landscaped area will be planted to the L1, L2, or L3 landscape standard. This landscaping, both new and existing, will be dispersed throughout the site (see Exhibit C.2). The new landscaped areas include replacing the asphalt area north of the gym doors along the SE 24th

Avenue frontage with landscaping to the L2 standard; planting L3 landscaping along the west perimeter of the new parking lot and L2 landscaping along the remaining perimeters; providing landscaping that consists of trees and shrubs within the interior of the new parking lot; and providing several new planting areas along the pedestrian plazas to the east of the building.

Regarding the intent of the site landscaping to help address stormwater runoff, BES has reviewed the applicant's Stormwater Management Plan and determined it can feasibly meet requirements of the City's Stormwater Management Manual.

The new and existing landscaped areas throughout the site, in combination with the open space provided by the athletic field, will maintain compatibility with the area. The small reduction in the percent of the overall site that is landscaped will not result in negative impacts on the area. This criterion is met for this request.

B. If in a residential zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in a C, E, or I zone, the proposal will be consistent with the desired character of the area; and

Findings: The site is located in the R5 residential zone, with proposed Adjustments to the maximum allowed FAR, minimum required building setback, minimum required landscape buffering, and minimum required landscaped area. As discussed above, the proposed building additions will be compatible with the existing building, while not overwhelming the adjacent residential neighborhood. The largest of the additions will be located toward the center of the site and set back more than 350 feet from the nearest residences. The additions on the street-facing facades front either the cemetery along SE Stark Street or the new parking lot on SE 24th Avenue. Because the reduced setback along SE 24th Avenue is the result of street widening, there will be no change in the distance between buildings on the CCHS site and residential homes across SE 24th Avenue. The requested Adjustments to the landscape requirements are based on the specific context of the site, and do not result in negative impacts on the appearance of the area. Even with the landscape Adjustment, much of the site's frontage along SE 24th Avenue will have improved landscaped areas if the proposal is approved. In addition, for the same reasons discussed in Section C (Livability) above, the proposed Adjustments will not significantly detract from the livability or appearance of the residential area.

As proposed, this criterion is met.

C. If more than one adjustment is being requested, the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zone; and

Findings: The overall purpose of the R5 zone, as stated in Zoning Code Section 33.110.010, is as follows:

The single-dwelling zones are intended to preserve land for housing and to provide housing opportunities for individual households. The use regulations are intended to create, maintain and promote single-dwelling neighborhoods. They allow for some non-household living uses but not to such an extent as to sacrifice the overall image and character of the single-

dwelling neighborhood. The development standards work together to promote desirable residential areas by addressing aesthetically pleasing environments, safety, privacy, energy conservation, and recreational opportunities. The site development standards allow for flexibility of development while maintaining compatibility within the City's various neighborhoods.

The Hearings Officer found, and the City Council concurs, that the Adjustment requests have no impact on preserving land for housing. While CCHS proposes expanding the campus boundaries to include two additional residentially-zoned properties, there are no Adjustments requested for this portion of the site. The Adjustment requests do not adversely impact such factors as promoting desirable residential areas, safety, privacy, energy conservation or recreational opportunities. The additional floor area created by the additions is relatively discrete, with the majority of the floor area located interior to the campus and not visible from most of the surrounding neighborhood. The street-facing additions are blended with the mass and design of the existing building through the use of materials, fenestration and step backs. The reduced setback is the result solely of the street widening, rather than additional building mass being placed closer to the street and nearby residences, with enhanced landscaping being provided throughout the campus and particularly along SE 24th Avenue.

As the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zone, this criterion is met.

D. City-designated scenic resources and historic resources are preserved; and

Findings: City-designated scenic resources are indicated on City zoning maps by a lowercase "s." Historic resources are indicated by a dot. There are no scenic or historic resources located on the subject site, therefore this criterion is not applicable.

E. Any impacts resulting from the adjustment are mitigated to the extent practical; and

Findings: With the exception of a recommended condition regarding the materials for the relocated trash enclosure on SE 24th Avenue, there are no adverse impacts associated with the Adjustment requests that require mitigation. Regarding the floor area increase, the majority of the addition has been located toward the interior of the site, farthest away from adjacent neighbors. The additions elsewhere on the site meet the height and setback standards with the exception of a 2,000 square foot, second-story addition along SE Stark Street, which is built to the same setback as the existing first story, and faces a cemetery. Street trees along this frontage help screen the addition. Enhanced landscaping will be provided along both street frontages of the site, including new landscaped areas along SE 24th Avenue (along the exterior of the gym wall and the new parking lot), and a new plaza with landscaping just east of the performing arts center entrance along SE Stark Street. While less than the required overall site landscaping will be provided, much of the landscaping that is proposed exceeds the minimum required L1 standard, with the athletic field providing a significant open space amenity.

As proposed, and with the condition of approval regarding the required materials for the trash enclosure, this criterion is met.

F. If in an environmental zone, the proposal has as few significant detrimental environmental impacts on the resource and resource values as is practicable;

Findings: Environmental zones are indicated on City zoning maps by a lowercase "c" or "p." There are no environmental zones located on the subject site; therefore, this criterion is not applicable.

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met, or have received an Adjustment via a land use review prior to the approval of a building or zoning permit.

Nonconforming development must meet the requirements of Section 33.258.070.D.2 of the Zoning Code. When alterations are made that are over the threshold of Section 33.258.070.D.2.a, the site must be brought into conformance with the development standards listed in Section 33.258.070.D.2.b.

III. CONCLUSIONS

The development proposed in this Conditional Use request is not intended to increase the intensity of use on the site. The floor area expansion will result in a net increase of only one classroom, with the remaining floor area increase devoted to specialized uses, such as band and choir space, visual arts, and a counseling center. Student enrollment will be maintained at the 800 to 850 level over the 10-year Master Plan period, and on-campus events and activities are proposed to be reduced over current levels.

The decision to keep enrollment within this spectrum has a large impact on this application. Most, if not all, of the adjacent neighbors' objections are related to issues of how the school currently operates and in the impact of non-resident students driving or being driven daily to school. While it is understood that these circumstances can be frustrating for those living nearby, the retention of the 1987 Traffic and Parking Management Plan and the 2002 Implementation Plan along with the additional measures in the 2011 Traffic and Parking Mitigation Measures as conditions of approval go well beyond mitigating the relatively minor impacts associated with the current application and address many of the neighbors' longstanding complaints about the school's operations. The City Council expects that the livability issues discussed in this decision will improve with the implementation of the three plans and other conditions of approval.

The appellant sought to overturn the Hearings Officer decision to approve the Conditional Use Master Plan for Central Catholic High School. The principal basis for the appeal was directed at the new parking lot and its resulting impact on the character and livability of the surrounding residential neighborhood. The appellant, and testimony received at the appeal hearing, also raised concerns about the parking lot being a new incursion into the surrounding neighborhood, and the potential for further expansion on school-owned properties outside the master plan boundary.

City Council finds that the new parking lot will address longstanding issues raised by neighbors related to the parking needs for school and after-school events and activities. The new parking lot will not only provide additional spaces during the school day, but

also will provide a location for bus loading and unloading, as well as additional parking spaces for after school events. This is a strategic use of a small parking lot that should help address parking and bus loading/unloading issues in the immediate area. The limited size of the parking lot, in combination with the proposed interior and perimeter landscaping, will mitigate for any visual impacts associated with the new lot. With the addition of a condition of approval that requires the parking lot be secured between the hours of 11 pm and 6 am, the City Council concurs with the Hearings Officer's conclusions that the parking lot meets the applicable Conditional Use Master Plan approval criteria.

Regarding the future school use of an additional three lots outside the master plan boundary that are owned by Central Catholic High School, the applicant has agreed to place a restrictive covenant on these three lots that limits their future use only to primary and accessory uses that are "allowed" or "limited" in the R5 zone, as provided in PCC 33.110.100(A), PCC 33.110.100(B), PCC 33.110.110 and Table 110-1. The City Council has included an additional condition that requires such a covenant be recorded.

On the issue of the applicability of the Religious Land Use and Institutionalized Persons Act ("RLUIPA") to this application raised at the June 6, 2011 hearing, the Hearings Officer found that it was unnecessary to address the Act because the application is approved. In reaching this conclusion, the Hearings Officer did not rule in any way on merits of Mr. Janik's arguments made at that public hearing. The City Council agrees with this conclusion.

IV. DECISION

It is the decision of the City Council to deny the appeal of the Buckman Community Association. With this decision, the City Council affirms the Hearings Officer's decision of approval, with a modification to the Hearings Officer's Condition E, and the inclusion of a new Condition M.

Approval of a Conditional Use Master Plan for Central Catholic High School; and

Approval of the following Adjustments:

- increase the maximum allowed floor area ratio on the site from 0.56:1 to 0.68:1
- reduce the minimum building setback for a portion of the second story addition on SE Stark Street from 12 feet to 0 feet; reduce the minimum building setback for a portion of the building wall on SE 24th Street from 15 feet to 6 feet, 6 inches;
- reduce the depth of the minimum required landscaped buffer along portions of SE 24th Avenue from 15 feet to 6 feet, 6-inches ; and
- reduce the minimum landscaped area (for the entire site) from 10 percent to 8.5 percent;

all subject to conformance with the approved site plan (Exhibit C.2) and building elevations (Exhibit C.3);

and subject to the conditions, below; conditions from previous land use reviews on this site are superseded by the following conditions:

A. Central Catholic High School shall continue to implement the 1987 Traffic and Parking Management Plan (Exhibit G.4) adopted as part of the approval granted in

CU 99-85 Condition A and CU 112-90 Conditions A and B, except as it may be inconsistent with this approval or the 2002 Implementation Plan (see Condition B, below).

B. Central Catholic High School shall continue to implement the 2002 Implementation Plan (Exhibit G.5), adopted as part of the approval granted in LU 02-131397 CU AD, Condition C, and signed by Central Catholic High School, the Buckman Community Association, and the immediate neighbors of Central Catholic High School. The obligation to implement the Plan is the responsibility of Central Catholic High School, the Buckman Community Association, and the immediate neighbors of Central Catholic High School. Non-compliance with the Implementation Plan is subject to enforcement by the City.

C. Central Catholic High School shall implement the 2011 Traffic and Parking Mitigation Measures, included in Exhibit A.7.

D. Central Catholic High School shall apply for a Public Works permit to request approval to widen SE 24th Avenue along the school's frontage by four feet, and must complete the widening prior to the beginning of the fall 2012 school year. The widening of SE 24th Avenue will also require a seven-foot dedication along the school's frontage on the east side, and a three-foot dedication along the school's frontage on the west side to provide sidewalk corridors that meet current 11-foot City standards. The dedications and a financial guarantee will be conditions of building permit approval.

E. Central Catholic High School shall construct the 15-space parking lot at the northwest corner of SE 24th Avenue and SE Stark Street prior to the loss of any existing on-site parking. During school hours, the parking lot must be reserved for bus parking and carpool use, with carpool vehicles having a minimum of three passengers. The parking lot shall be secured from 11 pm until 6 am. If Central Catholic High School needs the parking lot during those hours, the lot shall be secured immediately following Central Catholic's use of the lot

F. Central Catholic High School shall apply for a Public Works permit to request approval for curb extensions on the north and south side of SE Stark Street at SE 26th Avenue, and on the north side of SE Stark Street at SE 24th Avenue; the construction of these curb extensions must be completed prior to the beginning of the fall 2012 school year.

G. The loading and unloading of buses used for school events shall be limited to the drive aisle in the 15-space parking lot at the northwest corner of SE 24th Avenue and SE Stark Street. Buses are not allowed to idle, and engines shall not be turned on until all students are loaded.

H. Central Catholic High School shall apply for a Public Works permit to request permission to widen the sidewalk on the west side of SE 26th Avenue (between SE Stark Street and SE Morrison Street) and construct angled parking along this frontage. If approved by PBOT, the sidewalk widening and angled parking must be completed prior to the beginning of the fall 2012 school year.

I. Prior to building permit approval for any project approved under this Master Plan, Central Catholic High School shall submit to the Portland Bureau of Transportation a separate updated Transportation Demand Management document that includes the items related to strengthening the carpool program,

engaging with the City of Portland's Smart Trips program, and increasing on-site bike parking to more than the minimum required 128 spaces.

J. With the exception of a fully-sight-obscuring access gate (meeting the F2 screening standard), the trash enclosure located on the SE 24th Avenue frontage shall be clad in a brick material that replicates that used on the adjacent building facade.

K. This Conditional Use Master Plan shall expire 10 years from the date of the final decision.

L. Within three months from the date of the final decision, the applicant shall provide to the Bureau of Development Services three copies of the approved Conditional Use Master Plan that includes the conditions of approval listed above, and all changes that have been made to the Master Plan since it was originally submitted on February 22, 2011.

M. Prior to the issuance of any building permits for any project approved under this Master Plan, Central Catholic High School shall record a restrictive covenant that prohibits the three properties currently owned by Central Catholic High School and occupied by residential uses (legally described as Daltons Add, Block 1, Lot 2; Daltons Add, Block 1, Lot 3; and Daltons Add, Block 1, Lot 9) to be used for any use other than primary and accessory uses that are "allowed" or "limited" in the R5 zone, as provided in PCC 33.110.100(A), PCC 33.110.100(B), PCC 33.110.110 and Table 110-1 (including future amendments). The City shall be the beneficiary of the covenant, the covenant shall run with the land, and the covenant shall comply with PCC 33.700.060.

VII. APPEAL INFORMATION

Appeals to the Land Use Board of Appeals (LUBA)
This is the City's final decision on this matter. It may be appealed to the Oregon Land Use Board of Appeals (LUBA), within 21 days of the date of the decision, as specified in the Oregon Revised Statute (ORS) 197.830. Among other things, ORS 197.830 requires that a petitioner at LUBA must have submitted written testimony during the comment period or this land use review. You may all LUBA at 1 (503) 373-1265 for further information on filing an appeal.

EXHIBITS - NOT ATTACHED UNLESS INDICATED

A. Applicant's Statement
   1. Original Written Statement
   2. Letter from Boora Architects, dated April 5, 2011
   3. Traffic Impact Study and TDM Plan
   4. Stormwater Report
   5. Memorandum from Boora Architects, dated April 26, 2010
   6. Letter from Abby Dacey to Buckman Community Association, dated May 13, 2011
   7. 2011 Traffic and Parking Mitigation Measures, dated May 20, 2011 **(attached)**
B. Zoning Map **(attached)**
C. Plans and Drawings
   1. Master Plan Boundary **(attached)**

2. Proposed Site Plan **(attached)**
3. Building Elevations **(attached)**
4. Phasing Plan
5. Artist's rendering at SE Stark Street and SE 24th Avenue
6. Artist's rendering of detail at SE Stark Street and SE 24th Avenue
7. Artist's rendering at SE 24th Avenue and SE Oak Street
8. Basement and Sub-basement Plan
9. First Floor Plan
10. Second Floor Plan
11. Utility Plan

D. Notification information
1. Request for Response
2. Posting letter sent to applicant
3. Notice to be posted
4. Applicant's statement certifying posting
5 Mailing list
6. Mailed notice

E. Agency Responses
1. PBOT
2. BES
3. BDS/Site Development Review
4. Portland Water Bureau
5. Portland Fire Bureau
6. Portland Police Bureau
7. Portland Parks and Recreation/Urban Forestry Division
8. BDS/Life Safety Plans Examiner

F. Letters/E-Mails
1. Letter from Charles Christensen, dated May 11, 2011, in opposition
2. Letter from Jennifer Stenseth, dated May, 11, 2011, in opposition
3. E-Mail from Rob Roy Rowley, received May 12, 2011, in opposition
4. E-mail from Karin Cravotta, received May 13, 2011, in opposition
5. E-Mail from Chris Marston, received May 13, 2011, in opposition
6. E-Mail from Ed Kerns, received May 13, 2011, in opposition
7. Letter received from Jarkko Cain, dated May 14, 2011
8. Letter from George Gates, dated May 15, 2011, in opposition
9. Letter from Sandy Sampson, dated May 15, 2011, in opposition
10. E-Mail from Joe Futschik, received May 15, 2011, in opposition
11. E-Mail from Jill Blount, received May 15, 2011, in opposition
12. E-Mail from Ben Purdy, received May 15, 2011, in opposition
13. E-Mail from William Richmond, received May 15, 2011, in opposition
14. Letter from James Wood, dated May 15, 2011, in opposition
15. E-Mail from Justin Coope, received May 16, 2011, in opposition
16. Letter from Laura Schmidt, dated May 16, 2011, in opposition
17. Letter from Linda Gerber, received May 16, 2011, in opposition
18. E-Mail from Terry Dooley, received May 16, 2011, in opposition
19. E-mail from Lance Poehler, received May 18, 2011, in opposition
20. Letter from Carmen Brannon, dated May 16, 2011, in opposition
21. Letter received from Anezka Drazil, dated May 18, 2011, in opposition
22. Letter received from James Reyes, dated May 18, 2011, in opposition
23. Letter from the Buckman Community Association, dated May 16, 2011, in opposition
24. Letter from Catholic Youth Organization, dated May 23, 2011, in support
25. E-mail from Starbucks, received May 23, 2011, in support

G. Other

1. Original LUR application
2. Site LU history research
3. Application Completeness Review Letter to applicant
4. 1987 Traffic and Parking Management Plan **(attached)**
5. 2002 Implementation Plan **(attached)**
6. Request for Evidentiary Hearing and Waiver of Right to a Decision within 120 Days
7. Report and Decision of the Hearings Officer on CU 99-85
8. Decision of the Hearings Officer on LU 02-131397 CU AD

H. Received in the Hearings Office
1. Hearing Notice - Hardy, Douglas
2. Staff Report - Hardy, Douglas
3. 5/27/11 letter - Miller, Cezanne
4. 5/26/11 letter from Charles Christensen with attachments - Poelwijk, Yvonne
   a. 5/13/11 letter from Abby Curtin Dacey - Poelwijk, Yvonne
   b. 5/26/11 letter from Charles Christensen - Poelwijk, Yvonne
5. 5/26/11 e-mail from James P. King - Hardy, Douglas
6. 5/27/11 letter from Cezanne Miller - Hardy, Douglas
7. 6/6/11 letter - Sampson, Sandy
8. 6/6/11 letter from Jennifer R. Stenseth - Sampson, Sandy
9. 6/6/11 letter - Wood, James
10. 6/5/11 testimony with photos - Brannon, Carmen
11. 6/6/11 Memo - van Orden, Paul
12. 6/6/11 written testimony - Christensen, Charles
13. PowerPoint presentation printout - Hardy, Douglas
14. 6/10/11 Memo - van Orden, Paul
15. 6/13/11 E-mail - Sharkey, Char
16. 6/12/11 Letter with attachments - Wood, James
    a. Oregonian printout - Wood, James
    b. Historical Oregonian printout - Wood, James
    c. Oregonian article copy - Wood, James
    d. Aerial photo, 1943 - Wood, James
    e. Sanborn Map copy, 1924 - Wood, James
    f. Sanborn Map copy, 1924 - Wood, James
    g. Sanborn Map copy, 1924 - Wood, James
    h. Sanborn Map copy, 1950 - Wood, James
17. 6/13/11 Memo - Dacey, Abby
18. 6/13/11 Memo from Todd Mobley, Lancaster Engineering - Dacey, Abby
    a. Crash Information by Location - Dacey, Abby
    b. Crash Information by Location - Dacey, Abby
19. 6/13/11 Letter - Janik, Steve
20. 6/13/11 Letter - Janik, Steve
21. 6/13/11 Memo - Hardy, Douglas
22. 6/17/11 letter - Christensen, Charles
23. 6/16/11 letter with attachments - Sampson, Sandy
    a. 8/1/84 Oregonian article - City delays parking plan action - Sampson, Sandy
    b. 5/15/11 letter to Hardy - Sampson, Sandy
24. 6/17/11 letter with attachments - Christensen, Charles
    a. 2002 Agreement - Christensen, Charles
    b. Page 14 of Original Condition Use Master Plan - Christensen, Charles
    c. Page 8 of CU 99-85 - Christensen, Charles
    d. Aerial photo, 1943 - Christensen, Charles
    e. Letter dated 11/8/02 from Ball Janik - Christensen, Charles
    f. Letter dated 2/23/87 to Timothy Edwards - Christensen, Charles

g. Task 8 CCHS Implementation Plan, page 4 - Christensen, Charles
h. CU 99-85, page 3 - Christensen, Charles
i. 1984 Oregonian article - Christensen, Charles
j. LU-11-115222 CU MS Staff Report page 24-25 - Christensen, Charles
k. Relocate Central H.S. petition - Christensen, Charles

25. 6/18/11 letter - Brannon, Carmen
26. 6/19/11 - Wood, James
27. 6/20/11 letter - Stenseth, Jennifer R.
28. 6/20/11 letter - Gates, George
29. 6/20/11 Memo - Dacey, Abby
30. 6/20/11 Letter - Walters, Larry and Olivia Sitea
31. 6/27/11 Letter - Janik, Steve
32. 6/27/11 Memo - Dacey, Abby

I. Received After Hearings Officer Hearing
1. Appeal Submittal
2. Appealed Decision
3. Notice of Appeal
4. Appeal Packet TRACS Comments
5. Chris Linn Letter to Buckman Community Association, September 2, 2011
6. Mike Dee/Buckman Community Association Letter, September 8, 2011
7. J. Wood PowerPoint
8. Joe Chamberlain Letter to CCHS, September 9, 2011
9. Chris Linn E-mail, September 12, 2011
10. John Harrington Letter, September 12, 2011
11. Ball Janik Letter, September 12, 2011
12. Ball Janik E-Mail, September 12, 2011
13. Weston Investment Co Letter, September 12, 2011
14. Boora Architects Letter, September 14, 2011
15. Sandy Sampson E-Mail: Appeal Testimony, September 14, 2011
16. Buckman Community Association Appeal Testimony, September 14, 2011
17. Petition Submitted by Chris Martson, September 15, 2011
18. Testimony Sign-Up Sheets, September 15, 2011
19. Boora Architects PowerPoint, September 15, 2011
20. BDS PowerPoint, September 15, 2011

boora architects

MEMORANDUM

720 SW Washington
Suite 800
Portland, Oregon 97205
503.226.1575
503.241.7429 fax

boora.com

Date May 20, 2011 (revised)

To Douglas Hardy, Senior Planner
Land Use Services Division
1900 SW 4th Avenue, Suite 5000
Portland, Oregon 97201

CC Robert Haley, Portland Bureau of Transportation

From Abby Dacey

Subject Central Catholic High School
Land Use Review LU 11-115222 CU MS AD
Voluntary Traffic and Parking Mitigation Measures

Project No. 09022

This memo summarizes the additional traffic and parking mitigation measures that CCHS has agreed to pursue with regards to their site and operations, above and beyond the established 1987 and 2002 neighborhood agreements. All work in the right-of-way (i.e. not on CCHS property) is contingent upon the receipt of all necessary approvals and permits from the City of Portland. Changes to CCHS property and operations will be implemented in phases, corresponding with the master plan improvements.

Adjust pedestrian access to site away from residences

- On the west side of the property, the "athletic entrance", which is located mid-block between SE Oak Street and SE Pine Street, will be converted to an emergency-only exit and the main access to the lower level will be at the existing Oak Street entrance, which is currently an emergency exit only. *(CUMP application, page 7)* To be completed with Phase 2 improvements (tentatively 2015).
- On the east side of the property, there will be enhanced pedestrian access to the Link addition at the center of the site, a plaza at the corner of 26th and Stark and a plaza at the performing arts entrance along Stark. *(CUMP application, page 8)* To be completed by the opening of Phase 1 Link Building (tentatively Fall 2013).

Improve traffic flow *(CUMP application page 19)* To be completed by beginning of Fall 2012 school year.

- Widen 24th Avenue to 34 feet (curb-to-curb) between Stark Street and Pine Street.
- Remove 7:00 – 9:00 AM on-street parking restriction from the north side of Stark Street east of 26th Avenue. Install time-restricted parking for use during school pick-up and drop-off times.
- Create designated drop-off zones on the north side of Stark Street and on the east side of at 24th Avenue near Stark.

CASE NO. 11-115222
EXHIBIT A7

Increased accountability *(new proposals, not included in CUMP application)* To be completed in Fall 2011.

- CCHS will enroll a third-party license plate registration program so that school-related vehicles can be identified if no permit is displayed. Accordingly, if a neighbor calls to complain about a parking issue the school will be able to determine if the offending vehicle is affiliated with the school.
- CCHS will activate a night-time and weekend hotline number that neighbors can access during school events, outside of regular school hours.

Increase parking supply *(CUMP application page 19)*

- Construct parking lot on vacant CCHS-owned property on the west side of 24th Avenue between Stark Street and Oak Street. Reserve this lot for use by carpoolers with 3 or more students or staff members per vehicles. To be completed before loss of any existing on-site parking.
- Reconfigure on-street parking on the west side of 26th Avenue south of Stark Street to allow head-in diagonal parking. To be completed by beginning of Fall 2012 school year.

Bus loading and unloading *(new proposal, not included in CUMP application)*

- Remove bus loading/unloading functions from the street, to be relocated to timed bus zones within the drive lane of the west parking lot. To be enacted upon completion of parking lot.

Improve pedestrian safety *(CUMP application page 19)*

- Construct curb extensions on both the north and south sides of Stark Street at the intersection with 26th Avenue to facilitate pedestrian crossings on the west side of the intersection. Install an appropriately marked and signed school crossing. To be completed by beginning of Fall 2012 school year.
- Construct a curb extension on the south side of Stark Street at the existing school crossing at 24th Avenue. To be completed by beginning of Fall 2012 school year.

Transportation Demand Management *(CUMP application page 20)*

- Strengthen current carpool program to more aggressively match students and staff with similar travel routes and school schedules. Dedicate parking in new west lot to carpools with three or more occupants.
- Engage the SmartTrips program operated by the City of Portland to further encourage the use of alternative modes of transportation.
- Increase on-site bike parking to meet City of Portland requirements, for a total of 128 on-site spaces.
- The school has, and will continue, to communicate with Tri-Met about reinstating service that has been cancelled near the school.
- (See also "Increased Accountability")

Parking Demand Management *(CUMP application page 20)*

- Continue use of school staff at the intersections of 24th Avenue and 26th Avenues with Stark Street to observe and assist with morning student parking and drop off activities.
- Continue school-wide parking initiative to increase awareness and minimize neighborhood impacts.
- Increase enforcement and improve compliance with existing parking permit program.

Event Transportation & Parking Management *(CUMP application page 20 + new details)*

- Continue efforts to inform guests and visitors of preferred parking areas prior to the event.

        - CCHS will include reminders to avoid parking on residential block faces in periodic newsletters home to CCHS parents, on the School's website, in the School handbook, and with event invitations or tickets.
        - CCHS will provide verbal and written parking information to non-affiliated organizations that use CCHS facilities during the evenings and weekends regarding appropriate parking.
        - CCHS will notify each athletic conference and school district that attends campus of its parking policies.
        - CCHS will make announcements during evening and weekend events regarding appropriate parking.
    - Post portable changeable message signs to direct drivers to appropriate parking areas and/or inform drivers when parking areas are full.
    - For large events (>500 attendees, or 250 cars), provide the following:
        - Parking guidance staff or volunteers to direct drivers to appropriate areas.
        - Parking personnel to implement stacked parking on the new west lot (up to 20 additional spaces).

Reduce intensity of use of school *(new proposals)* Due to existing contracts and agreements, some of the changes will be phased between now and the start of the 2012-2013 school year.

- Reduce the number of events that are held at the school:
    - Eliminate all City Volleyball events
    - Eliminate all CYO Basketball events
    - Eliminate all Concordia University events
    - Eliminate Freshman football games from occurring on the school's athletic field
    - Eliminate one school dance
    - Reduce the number of CYO Football events by half. On the remaining days, games will be staggered so one game's attendees can depart before the next group arrives.
    - Reduce the number of weekend volleyball tournaments that the school hosts. The school will eliminate one tournament during the 2011-12 school year.

- Reduce the hours and days that school activities occur:
    - No non-school activities will be held on Sundays.
    - No school activities will extend beyond 10pm, with the exception of two (2) dances. These dances will end at 11pm and security personnel patrol the vicinity to control noise or other violations.

- Reduce access to the school from SE 24th Street during the summer:
    - The existing athletic entrance (24th street, between Oak and Pine) and the Oak Street entrance (24th & Oak) will be locked during the summer session. These doors will only be used as emergency exits during this time. Access to the school facilities for summer events will be through the front door (24th & Stark Street) and through the gate at SE 26th & Stark Street.

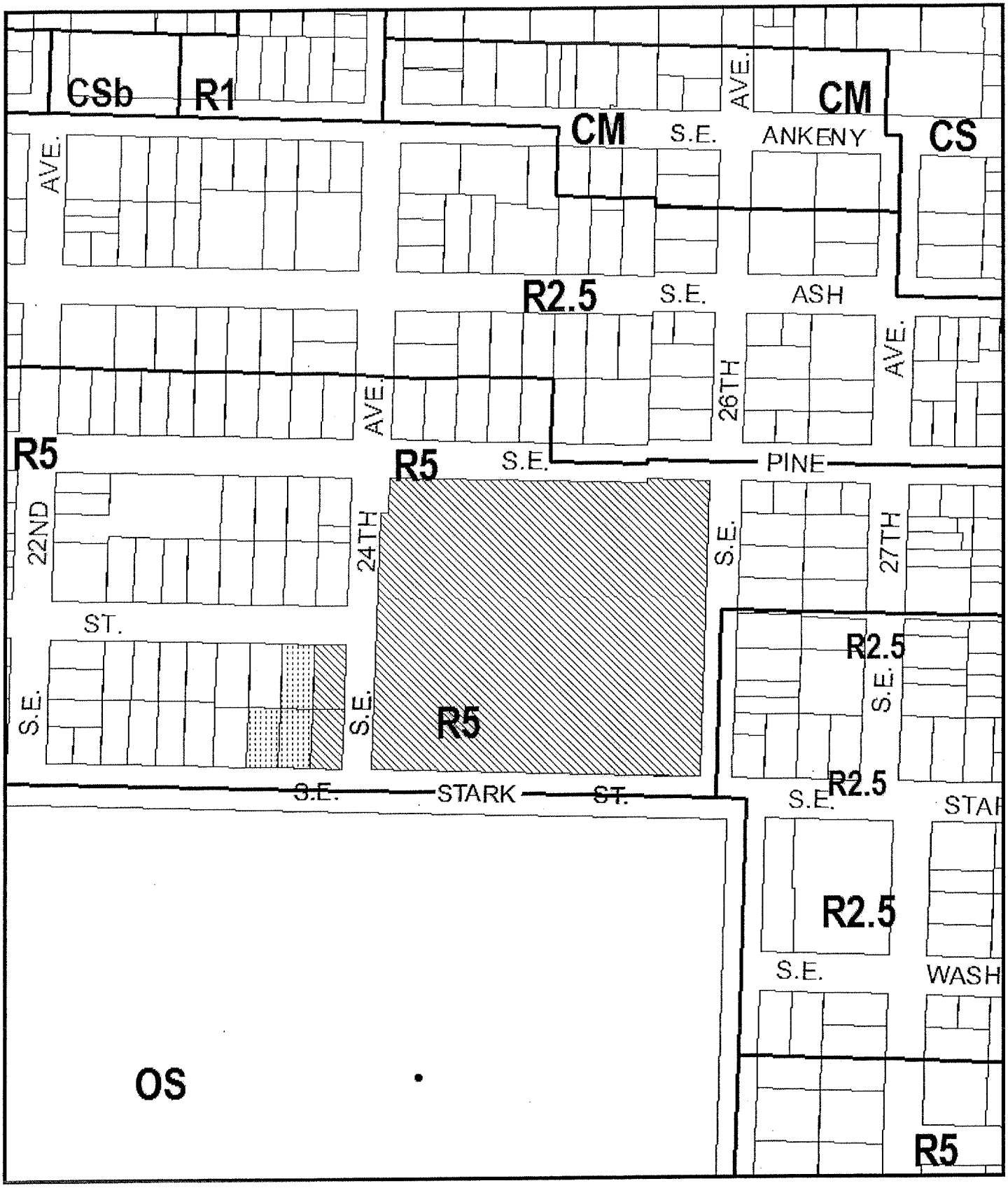
END OF MEMO

Event Calendar

(revised 5-20-2011)

Event	Time of Occurance	Frequency	Typical Attendance	*Additional Management*
Phonathon	Evening	5	10	
Alumni Board Meeting	Evening	7	10	
School Board Meeting	Evening	2	12	
Parent Associaton Meeting	Evening	9	15	
Curriculum Night	Evening	1	20	
John Shepard Classic	Evening	2	25	
Incoming Freshman Parent Forum	Evening	1	30	
~~City Volleyball~~	~~Evening~~	~~4~~	~~30~~	
Spring Music Concert	Evening	1	40	
Winter Music Concert	Evening	1	40	
Academic Awards	Evening	1	50	
One Act Plays	Evening	1	50	
Boys Freshman B Basketball	Evening	2	50	
Open Mic Night	Evening	3	50	
Boys JVII Basketball	Evening	5	50	
Boys Junior Varsity Basketball	Evening	11	50	
Rambooster BBQ	Evening	1	75	
College Financial Aid Night	Evening	1	100	
College Planning Night	Evening	1	100	
Spring Sports Parent Meeting	Evening	1	100	
Spring Drama	Evening	4	100	
Fall Drama	Evening	6	100	
Conferences - Spring	Evening	1	150	
Freshman Forecasting Night	Evening	1	150	
Winter Sports Awards Night	Evening	1	250	
Spring Sports Awards	Evening	2	250	
Girls Varsity Basketball	Evening	10	250	*parking guidance if > 150 attendees*
Back to School Dance	Evening	1	300	*parking guidance*
~~Sadie Hawkins Dance~~	~~Evening~~	~~1~~	~~300~~	
Conferences - Fall	Evening	2	350	
Boys Varsity Basketball	Evening	10	400	*parking guidance if > 150 attendees; stacked parking if > 500 attendees*
Baccalaureate Mass	Evening	1	500	*stacked parking; parking guidance*
Back to School Night	Evening	1	500	*stacked parking; parking guidance*
Alumni Weekend	Evening	1	150-400	
G B-Ball 7th & 8th Camp (School)	Summer / Afternoon	4	40	*no entry on 24th street*
Boys Summer Basketball (School)	Summer / Afternoon	1	50	*no entry on 24th street*
~~Concordia HS Team Camp (Other)~~	~~Summer / Afternoon~~	~~4~~	~~100~~	
Line Tech Camp (School)	Summer / AM	4	25	*no entry on 24th street*
F-Ball Conditioning (School)	Summer / AM	2	40	*no entry on 24th street*
G B-Ball 4th to 6th Camp (School)	Summer / AM	4	40	*no entry on 24th street*
Boys B-Ball 5th to 7th Camp (School)	Summer / AM	8	50	*no entry on 24th street*
~~Concordia Soccer Camp (Other)~~	~~Summer / AM~~	~~5~~	~~80~~	
CYO Football Camp (School)	Summer / AM	5	100	*no entry on 24th street*
Summer Basketball Tournament (School)	Summer / AM	3	200	*no entry on 24th street*
Boys B-Ball 8th & 9th Camp (School)	Summer Afternoon	7	50	*no entry on 24th street*
Eucharistic Minister Retreat	Weekend	1	20	
John Shepard Classic	Weekend	4	25	
~~CYO Tournament (Basketball)~~	~~Weekend~~	~~2~~	~~150~~	
Boys Varsity Soccer	Weekend / 1PM	2	100	
Boys Varsity Football	Weekend / Afternoon	1	50	
Girls Junior Varsity Soccer	Weekend / Afternoon	1	50	

Anthony Newman Camp (Coaches)	Weekend / Afternoon	2	100	
Baseball Youth Camp (School)	Weekend / Afternoon	1	150	
Computer Exam	Weekend / AM	5	15	
SAT Prep Class	Weekend / AM	12	15	
MHC Cheer Clinic	Weekend / AM	1	25	
~~CYO High School League (Basketball)~~	~~Weekend / AM~~	~~7~~	~~35~~	
~~CYO High School League (Basketball)~~	~~Christmas / AM~~	~~1~~	~~35~~	
Girls Freshman Volleyball	Weekend / AM	2	40	
Girls Junior Varsity Volleyball	Weekend / AM	~~2~~ 1	50	*eliminate 1 tournament in 2011-2012*
Mathfest	Weekend / AM	1	50	
PSAT Test	Weekend / AM	1	80	
Football Youth Camp	Weekend / AM	1	100	
Girls Varsity Soccer	Weekend / AM	1	100	
ACT Test	Weekend / AM	2	120	
CYO Football Games	Weekend / Am or Afternoon	reduce number of games by half	40	
~~Knight of Columbus CYO Tournament~~	~~Weekend / AM or Afternoon~~	~~2~~	~~50~~	
CYO Coaches Clinic	Weekend / PM	1	10	
~~Concordia Practice~~	~~Weekend / PM~~	~~1~~	~~20~~	
Homecoming Dance	Weekend / PM	1	700	*stacked parking; parking guidance*
Open House	Weekend AM to Afternoon	1	800	*stacked parking; parking guidance*



ZONING

Site

Also Owned

NORTH

File No. LU 11-115222 CUMS

1/4 Section 3032,3033

Scale 1 inch = 417 feet

State_Id 1N1E36CC 10600

Exhibit B (Mar 04,2011)

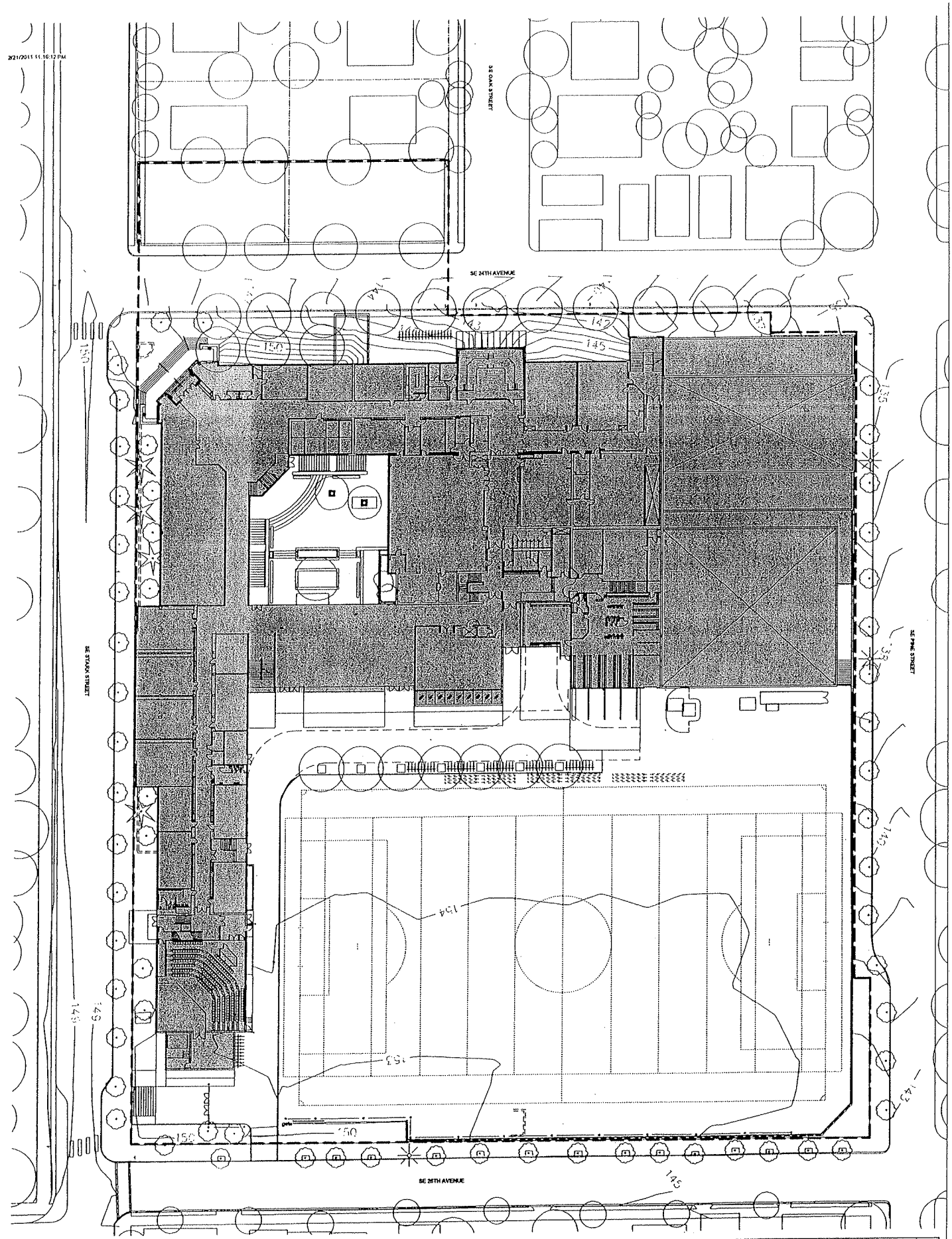


EXHIBIT-B

SITE BOUNDARY PLAN

NUMBER REVISION DATE

Scale: 1" = 20'-0"

Drawn By:

Issued: 02.16.2011

SITE PLAN BOUNDARY

CONDITIONAL USE APPLICATION

ISSUED FOR INFORMATIONAL PURPOSES ONLY

NOT FOR CONSTRUCTION

CASE NO. 11-115222

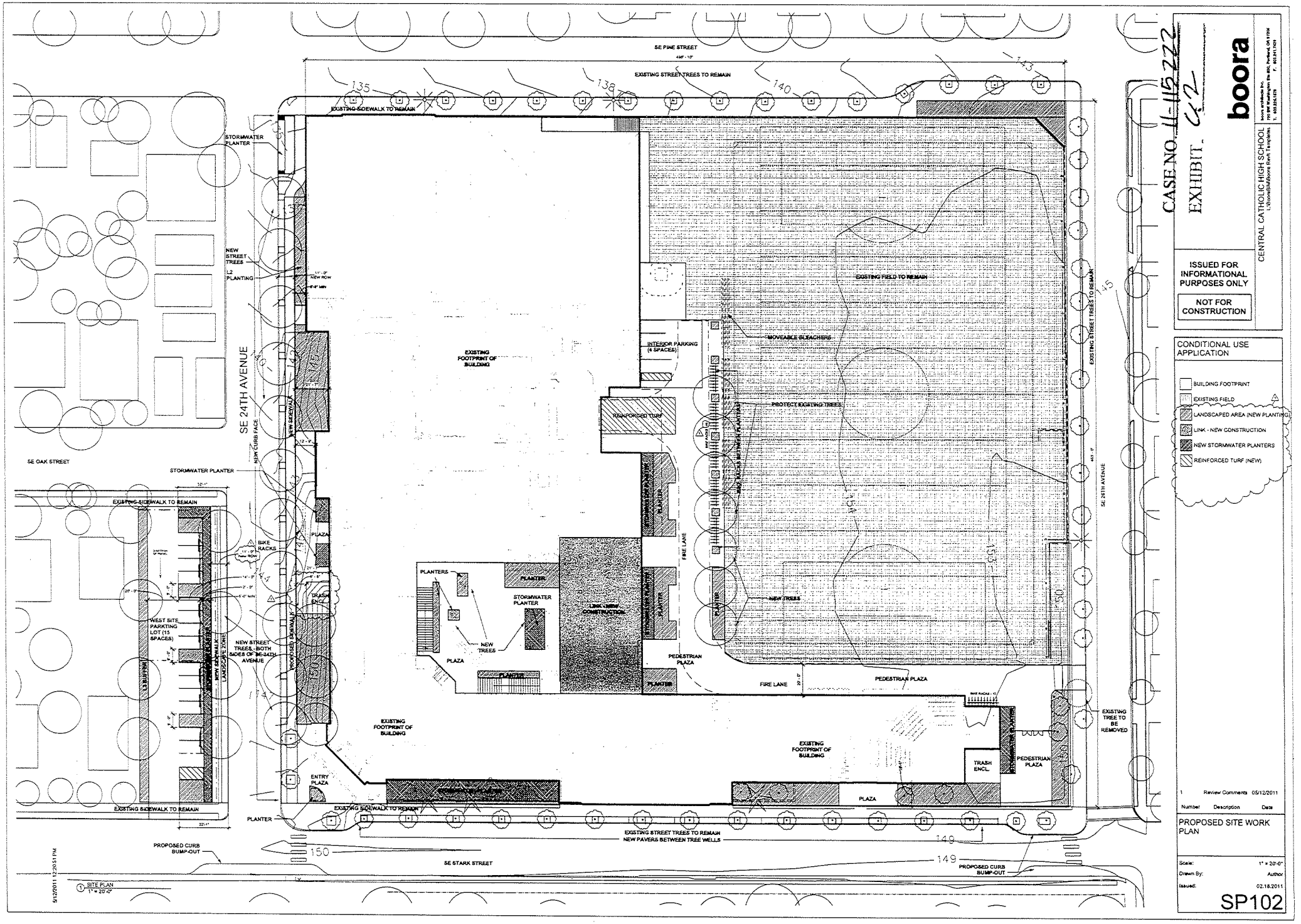
EXHIBIT C1

boora

CENTRAL CATHOLIC HIGH SCHOOL

L:\Boora\BIM\Boora Revit Templates

boora architecture inc.
720 SW Washington Ste 660, Portland, OR 97205
T. 503.226.1575 F. 503.541.1128



CASE NO. 11-115 222
EXHIBIT 4-2

boora

CENTRAL CATHOLIC HIGH SCHOOL

ISSUED FOR INFORMATIONAL PURPOSES ONLY

NOT FOR CONSTRUCTION

CONDITIONAL USE APPLICATION

- BUILDING FOOTPRINT
- EXISTING FIELD
- LANDSCAPED AREA (NEW PLANTING)
- LINK - NEW CONSTRUCTION
- NEW STORMWATER PLANTERS
- REINFORCED TURF (NEW)

Number	Description	Date
1	Review Comments	05/12/2011

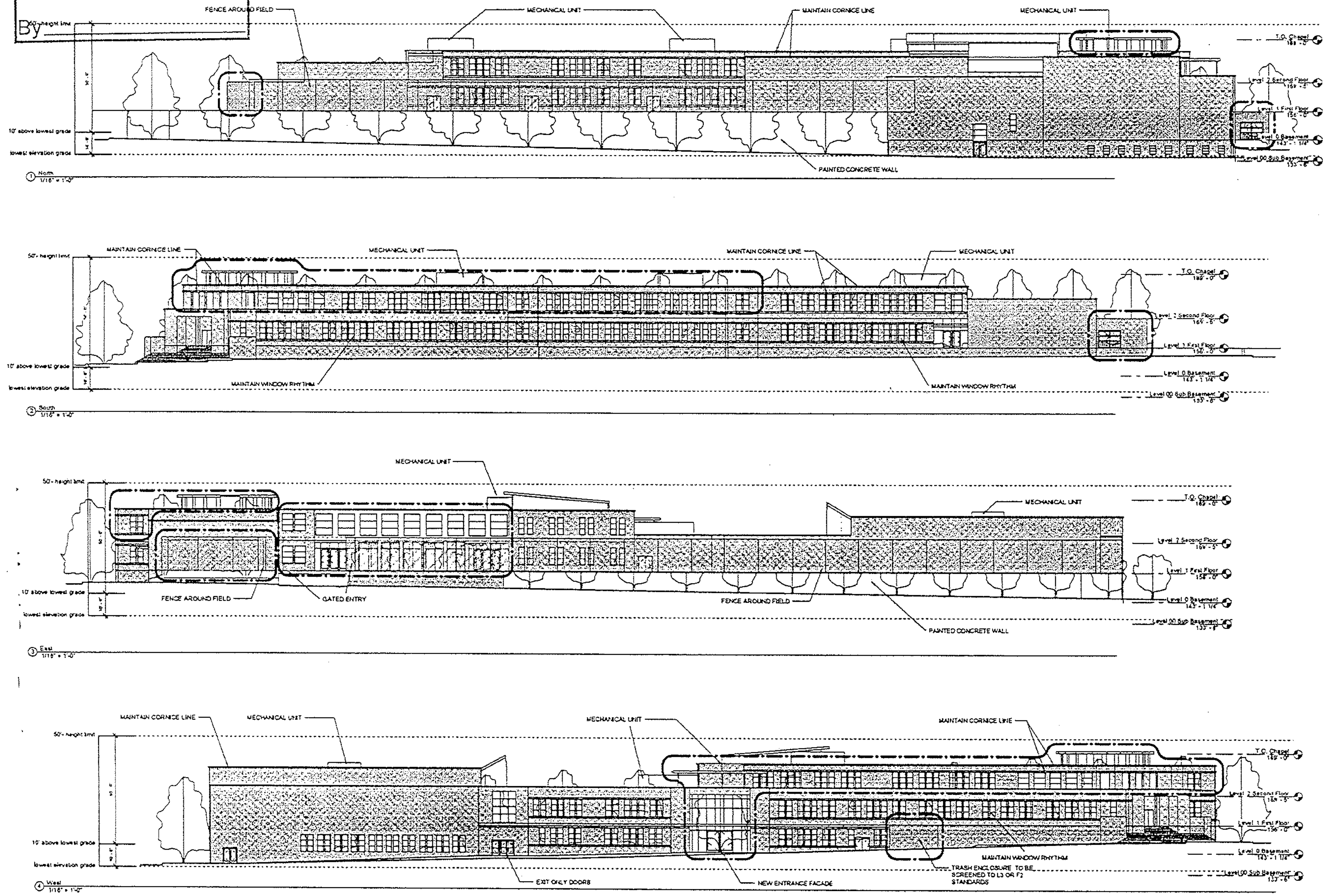
PROPOSED SITE WORK PLAN

Scale: 1" = 20'-0"
Drawn By: Author
Issued: 02.18.2011

SP102

5/12/2011 12:20:51 PM

RECEIVED
FEB 22 2011
By



2/18/2011 12:21:13 PM

CASE NO. 11-115222
EXHIBIT C3

boora

CENTRAL CATHOLIC HIGH SCHOOL

ISSUED FOR INFORMATIONAL PURPOSES ONLY

NOT FOR CONSTRUCTION

CONDITIONAL USE APPLICATION

NEW BUILDING

1. ALL ON-GRADE MECHANICAL UNITS TO BE SCREENED FROM STREET VIEW WITH SCREENING TO MEET L2 OR F2 STANDARDS. ALL ROOFTOP UNITS TO BE SCREENED IF WITHIN 50' OF PROPERTY LINE.

NUMBER	REVISION	DATE

EXTERIOR ELEVATIONS

Scale	1/16" = 1'-0"
Drawn By	Author
Issued	02.16.2011

A301

1987 TRAFFIC & PARKING MANAGEMENT PLAN

March 30, 1987

CENTRAL CATHOLIC HIGH SCHOOL: TRAFFIC AND PARKING MANAGEMENT PLAN

Goal A: LIMIT DAYTIME, SCHOOL-RELATED VEHICLE PARKING TO ON-STREET LEGAL SPACES AVAILABLE WITHIN 3 BLOCKS OF CENTRAL CATHOLIC SCHOOL PROPERTY, with the exceptions noted below.

Strategy #1: Assign school on-street PARKING to the defined boundaries as follows:

a. Stark / north and south sides / from 26th to 21st / for faculty, staff and students.

b. 24th / west side between Stark and Oak / for faculty and staff.

c. 24th / east side / between Oak and Pine / faculty and staff only.

d. 24th / east and west sides / between Pine and Alder / faculty only.

e. Pine / north and south sides / between 24th and 26th / students.

f. 26th / east and west sides / between Stark and Alder / students.

g. 26th / west side / between Stark and Morrison / students.

Strategy #2: Define the following boundaries as NO PARKING for faculty, staff and students:

h. 24th / west side / between Oak and Pine.

i. Oak / north and south sides / between 24th and 22nd.

j. Pine / north and south sides / between 24th and 22nd.

Strategy #3: Designate the following boundary as LOADING and UNLOADING students before and after school, as well as GUEST PARKING ONLY DURING THE SCHOOL DAY:

k. 24th / east side / between Stark and Oak.

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EXHIBIT 94

Goal B: LIMIT THE NUMBER OF AUTOMOBILES PARKED NEAR CENTRAL CATHOLIC ON A DAILY BASIS BY FACULTY, STAFF AND STUDENTS TO 225.

Strategy #4: Allocate annually only 225 parking permits to be shared by faculty, staff and students.

Strategy #5: Prioritize the allocation of parking permits as follows:

a. faculty and staff;

b. seniors who carpool other CC students each day;

c. juniors who carpool other CC students each day;

d. upper division students who only drive themselves to school on a regular basis; and

e. upper division students who only drive themselves to school on an occasional basis.

Strategy #6: Deny parking permits to sophomores who become eligible to drive during their sophomore year.

Goal C: DEMAND STUDENT DRIVERS PARK IN THE DEFINED BOUNDARIES AS DESCRIBED IN THE CENTRAL CATHOLIC HIGH SCHOOL TRAFFIC AND MANAGEMENT PARKING PLAN.

Strategy #7: Assign lockers closest to school entrances / exits to student drivers who carpool other students.

Strategy #8: Enforce compliance to assigned parking by detaining student drivers after school who violate the defined boundaries.

Strategy #9: Respond promptly to calls from neighbors regarding violations of the defined boundary for parking.

Strategy #10: Assign a faculty member to supervise student parking near the corner of 24th and Pine before school each morning.

Goal D: INCREASE USE OF CARPOOLING, SCHOOL-SPONSORED BUSING, and PUBLIC TRANSIT SYSTEM BY 10% to 20% AS PREFERRED MODES OF TRANSPORTATION TO AND FROM SCHOOL BY THE YEAR 1990.

Strategy #11: Stimulate increased ridership on school-sponsored busing to and from Vancouver (WA) and southern Washington County (OR) by keeping the fare rate at below breakeven cost to the school.

Strategy #12: Elicit cooperation of parents to utilize carpooling opportunities by:

a. promulgating the Traffic and Parking Management Plan with its important rationale in the 1987-1988 Parent/Student Handbook;

b. publishing the goals of the plan with explanations in the annually printed Student Directory which lists each student by address and phone number;

c. communicating with parents and students by memo, letter, etc. at least quarterly on the importance of compliance with the Traffic and Parking Management Plan.

Strategy #13: Impact ridership of students on Tri-Met by intensifying efforts in the following areas:

a. promulgating the availabilty of mail applications for monthly Tri-Met passes at the student bookstore;

b. displaying prominently at the main school entrance the Tri-Met routes and timetables;

c. cooperating with Tri-Met officials with any efforts to market the transit system to the public at large or our students in particular;

d. encouraging students each September at their class orientation assemblies to use Tri-Met as a preferred mode of transportation to and from school.

Goal E: DEVELOP AN ANNUAL TRAFFIC AND PARKING MANAGEMENT REPORT FOR SUBMISSION TO THE APPROPRIATE HEARINGS OFFICER.

Strategy #14: Assign an administrator to translate the goals and strategies of the Traffic and Parking Management Plan into a workable, data format that will assure accountability by the school.

Strategy #15: Submit this report each April to the City of Portalnd's hearings officer and appropriate bureaus.

Implementation Plan to Resolve Parking, Traffic and Other Issues of Concern to Central Catholic High School (CCHS), Immediate Neighbors of Central Catholic High (INCCH) and Buckman Community Association (BCA)

Central Catholic High School, its Immediate Neighbors and the Buckman Community Association have agreed that parking and traffic continue to be problems on the blocks surrounding the School. The Immediate Neighbors of Central Catholic High are defined as residents of SE 24th and SE 26th Avenues between SE Stark and SE Ash Streets; SE Pine, SE Oak and SE Ash Streets between SE 23rd and SE 27th Avenues.

After discussing the problems and possible solutions, the school and the neighbors have jointly agreed to the following Implementation Plan as an attempt to resolve these isues. The school and the neighbors have set out the following as goals of the Implementation Plan:

- Goal I: Continue to implement and strengthen the existing 1987 traffic and parking management plan.
- Goal II: Reduce the number of unregistered student parkers.
- Goal III: Explore implementing a City enforced area parking permit program.
- Goal IV: Pursue off-street parking alternatives.
- Goal V: Reduce traffic congestion on SE 24th Ave. and SE 26th Ave. during school start and end times.
- Goal VI: Limit the number of evening and weekend events that draw large crowds.
- Goal VII: Reduce the number of evening and weekend event parkers on residential block faces.
- Goal VIII: Increase Student participation in the Buckman Community.
- Goal IX: Continue the existing dialogue between CCHS, BCA and INCCH after the conditional use permit is approved.

Goal I: Continue to implement and strengthen the existing 1987 traffic and parking management plan.

Task 1: CCHS will require all students to register all vehicles with the School.

- CCHS will require all students to register all vehicles (i.e. student and family cars) with the school, even if the student does not have a parking permit.

- Central Catholic agrees to create a database of all license plate numbers so that school-related vehicles can be identified if no permit is displayed. Accordingly, if a neighbor calls to complain about a parking issue the school will be able to immediately determine if the offending vehicle is affiliated with the school.

Task 2: CCHS will continue to limit the number of parking permits to 225.

- Prior to registering their vehicle(s), all students are provided a form that explains and depicts the parking restrictions, and the consequences of violating the parking policies. In order to receive a parking permit, students must signify that they have reviewed, understand and agree to abide by the 1987 traffic and parking management plan.

- CCHS agrees to continue to limit the number of parking permits to 225.

Task 3: CCHS will continue to enforce the geographic boundaries established in the 1987 traffic and parking management plan of where it is appropriate for permitted students to park.

Central Catholic will continue to limit daytime, school-related vehicle parking to on-street legal spaces available within 3 blocks of CCHS property, with the exceptions noted below.

Block faces that are appropriate for on-street school-related vehicles:

- North and south sides SE Stark between SE 21st Ave. and SE 26th Ave.;
- East side of SE 24th Ave. between SE Stark St. and Pine St. (a portion of this area is designated as 15 minute parking only);
- West side of SE 24th Ave. between SE Stark St. and SE Oak St.;
- East and West sides of SE 24th Ave. between Pine St. and Ash St.;
- North and south sides of SE Pine St. between 24th Ave. and 26th Ave.,
- East and west sides of SE 26th Ave. between SE Stark St. and SE Ash St.; and
- West side of SE 26th Ave. between SE Stark St. and SE Morrison St.

Block faces that designated as NO Parking for faculty, staff and students:

- West side of SE 24th Ave. between SE Oak St. and SE Pine St.
- North and south sides of Oak St. between SE 24th Ave. and SE 22nd Ave.
- North and south sides of SE Pine St. between 24th Ave. and 22nd Ave.

Task 4: As a way to reduce the number of student parkers, Central Catholic will continue to encourage students to use alternative modes of transportation.

- CCHS will continue to provide subsidized Tri-Met bus passes to its students.

- As part of CCHS's expansion, it is updating its bicycle parking facilities so that 44 secure bicycle parking spaces are provided, 22 of which are covered.

- CCHS will continue to encourage students to carpool by providing carpool information (i.e. a list of students by zip code) during registration, orientation and throughout the school year.

Task 4: Central Catholic will continue its enhanced monitoring of student parking.

The 1987 Parking Management Plan requires that one faculty member be assigned to supervise student parking near the corner of SE 24th Ave. and SE Pine St. before school each morning. The school will continue to exceed the requirement by having at least three faculty members posted from 7:30 to 8:00 a.m. and 2:30 to 3:00 p.m. at SE 24th Ave. and SE Pine St., SE 24th Ave. and SE Oak St., and SE 26th Ave. and SE Stark St. Additionally, one faculty member will roam the parking plan area in the morning and after school.

Task 5: CCHS will continue its efforts to educate school students, parents and visitors of the importance of complying with the traffic and parking management plan.

Central Catholic will increase its efforts to educate school students, parents and visitors about the 1987 traffic and parking management plan by communicating through multiple means, including the School's handbook, periodic student and parent meetings, regular newsletters home, and the School's website.

Task 6: Increase the penalty for violating the traffic and parking management plan.

- Parking anywhere on-street without a permit, parking in an area designated as no parking (regardless of if a student has a permit or not) and parking illegally (regardless of if a student has a permit or not) are all considered violations.
- Currently, students who violate the school vehicle registration and parking policies are subject to after-school detention or suspension/probation.
- The restrictions and consequences are explained to all students in the official student handbook.
- As an increased incentive to abide by the parking restrictions, beginning with the 2003-2004 school year, Central Catholic will increase the penalty for driving without a permit to:
    - 1st offense: 1 day of detention
    - 2nd offense: 1 week of detention
    - 3rd offense: Parent-student conference with the Dean of Students with the potential for suspension and/or probation.

Task 7: CCHS will provide its neighbors with a "good neighbor packet" before each school year so that the neighbors are informed about School events and policies.

Before each school year begins the school will send the surrounding neighbors a "good neighbor packet" that includes a calendar of school events, the complaint hot line phone

number and e-mail address, a copy of the 1987 parking plan, a copy of the 2002 implementation plan and general information.

Task 8: CCHS will provide neighbors with a "complaint hotline" that will facilitate communication between the neighbors and the School and enable the School to effectively respond to complaints.

- Central Catholic agrees to create a complaint hot line that is a single mobile phone line dedicated solely to neighborhood communication. By having one phone line that can be handed off to available members of the school's staff, neighbors will have immediate access to a responsible person at the school so that any complaints can be addressed in a timely manner.

- CCHS will provide neighbors with a complaint e-mail address so that non-urgent issues can be addressed and a record is created.

Task 9: CCHS will log all neighborhood communications and report to the Buckman Community Association meeting.

The School agrees to keep a log of all neighborhood communications and to report on the log at each Buckman Community Association meeting. By keeping track of communications and relaying them to the neighborhood, the school and neighbors hope to create an accurate record of the effectiveness of CCHS's mitigation measures.

Task 10: CCHS will paint neighbor's driveway areas yellow at the neighbor's request.

Task 11: Central Catholic will contact and encourage the police to increase its presence around the school.

An increased police presence around the school is likely to discourage reckless driving and illegal parking. Therefore, CCHS will request the police to increase its presence around the school. For example, the school will encourage officers to park in the vicinity of the school while they write police reports.

Task 12: Explore implementing a City enforced area parking permit program.

A City implemented area parking permit program (akin to programs in areas of town such as Goose Hollow) may be an effective parking control mechanism. However, there is not a consensus among the neighbors and School if the City enforced area parking plan is appropriate for the Buckman neighborhood. Goal III elaborates on the issues and tasks involved with a City enforced area parking permit program.

Goal II: Reduce the number of unregistered student parkers.

Students are required to register their vehicles and obtain a parking pass before driving to school. Yet some unregistered students continue to drive to school. These students may not know the parking regulations and are difficult to track down when they park illegally.

Task 1: Increase the penalty for parking without a permit.

- Parking anywhere on-street without a permit, parking in an area designated as no parking (regardless of a student has a permit or not) and parking illegally (regardless of a student has a permit or not) are all considered violations.
- Currently, students who violate the school vehicle registration and parking policies are subject to after-school detention or suspension/probation.
- The restrictions and consequences are explained to all students in the official student handbook.
- As an increased incentive to abide by the parking restrictions, beginning with the 2003-2004 school year, Central Catholic will increase the penalty for driving without a permit to:
    - 1st offense: 1 day of detention
    - 2nd offense: 1 week of detention
    - 3rd offense: Parent-student conference with the Dean of Students with the potential for suspension and/or probation.

Task 2: Central Catholic will continue its monitoring of student parking.

- The 1987 Parking Management Plan requires that one faculty member be assigned to supervise student parking near the corner of SE 24th Ave. and SE Pine St. before school each morning.
- The school will continue to exceed the requirement by having at least three faculty members posted from 7:30 to 8:00 a.m. and 2:30 to 3:00 p.m. at SE 24th Ave. and SE Pine St., SE 24th Ave. and SE Oak St., and SE 26th Ave. and SE Stark St. Additionally, one faculty member will roam the parking plan area in the morning and after school.
- An increased presence of faculty monitors may discourage unpermitted students from driving to and parking at School. The additional number of monitors increases the likelihood that a student parking without a permit will be caught and penalized.

Task 3: Improve Central Catholic's ability to track unregistered drivers.

Central Catholic has a limited ability to patrol the neighborhood streets looking for unregistered drivers. In order to improve the school's ability to penalize unregistered

drivers, neighbors will report all student cars without permit tags clearly visible on the rearview mirror to the complaint hotline. A copy of the Central Catholic parking tag is included below. The complaint hotline is a single mobile phone line dedicated solely to neighborhood communication. By having one phone line that can be handed off to available members of the school's staff, neighbors will have immediate access to a responsible person at the school so that any complaints can be addressed in a timely manner.

Goal III: Explore implementing a City enforced area parking permit program.

A City implemented area parking permit program (akin to programs in areas of town such as Goose Hollow) may be an effective parking control mechanism. However, there is not a consensus among the neighbors and School if the City enforced area parking plan is appropriate for the Buckman neighborhood. Therefore, the School and neighborhood need to work together to determine if the City enforced area parking permit is a desirable and viable solution.

Task 1: Identify possible area parking permit programs, including the type of permits that would be used and the boundaries of the permit area.

The first step in determining if a City enforced area parking permit program is appropriate for CCHS and the Buckman neighborhood is to identify the kind of permit that would be utilized and the parking area boundaries. The School and neighbors have discussed using a "residential only" parking permit, a traditional parking permit or a hybrid program. Each type of program should be analyzed and a range of options should be proposed to the BCA or an appropriate subcommittee.

Task 2: Consider funding mechanisms for the area parking permit program options identified.

Neighbors have expressed interest in having CCHS finance the area parking permit program. Once the program options are identified (Task 1), CCHS can assess the feasibility of it funding the program. As part of this process, CCHS would like to investigate alternative funding methods, such as funding a portion of the permits, funding the permits for a discrete period of time etc.

Task 3: Evaluate the level of neighborhood support for each option and identify the preferred program option (if any).

Once the program and funding options are identified, each option should be presented to the neighborhood to determine if there is general support for the program. During this process, the preferred option can be selected, or the neighborhood could decide to not proceed with the City enforced area parking permit program.

Task 4: If there is general neighborhood support for the City area parking permit program, initiate the permit process with the City.

If there is general support for the preferred program and funding mechanism, then BCA (including CCHS) would initiate permit process with City. The City process includes initiating the petition to the City, the City's review, public hearings and ballot, voting and City Council approval.

Goal IV: Pursue off-street parking alternatives.

The ideal solution to the livability impact of most CCHS-related vehicles parking on the street is to provide adequate off-street parking.

Task 1: Investigate off-site parking.

CCHS will pursue off-site parking options. Considerations include the availability of a long-term lease, distance from the school, safety considerations, and cost (including a shuttle bus if needed).

Task 2: Explore constructing an on-site parking structure.

Providing on-site parking, by either an above- or under-ground parking structure, for CCHS-related vehicles would alleviate most of the existing livability issues. However, constructing a parking structure would require a significant fund raising effort, and may not be possible unless a subsequent expansion of the School is considered. CCHS will investigate the cost, design and feasibility of providing an on-site parking structure.

Goal V: Reduce traffic congestion on SE 24th Ave. and SE 26th Ave. during school start and end times.

School start and end times create congestion and dangerous street conditions on 24th and 26th Avenues due to the level of background neighborhood traffic, buses and parents dropping off and picking up students, and student drivers themselves. The situation is exacerbated by the fact that SE 24th Ave. is a narrow street. Currently, there are 15 minute parking areas on SE 24th Ave. and SE Stark St. near the corner entrance of the School. Drop offs and pick ups are supposed to occur at these locations, but at high volume times the short term parking areas are not available. CCHS and INCCH believe the current conditions are unacceptable and seek a safer situation for students and residents.

Task 1: Investigate alternate drop-off and pick-up locations for buses and parents.

- Given the constraints of the intersections, CCHS will investigate alternate solutions to this problem, and report to neighbors at the BCA meeting.

- An idea that has been suggested is converting the School-owned vacant lots on the southwest corner of SE Stark St. and SE 24th St. into a landscaped vehicle staging/loading area. There is not universal support for this proposal among the neighbors, and it is uncertain if the City would allow such a use. However, CCHS will continue to explore this and other solutions.

- The School does not provide busing to and from the school for its students. However, the school does provide limited busing from the school to athletic events and to the quarterly religious retreats. When used, buses park on SE Pine St. in back of the school between SE 24th and SE 26th Avenues to be loaded. While the buses are being loaded, they double-park on SE Pine St., which is 60 feet wide. If the school were to reserve curbside spaces for the buses, it would eliminate about 15 parking spaces along SE Pine St. For athletic events, the buses are double-parked from 2:30 p.m. to about 2:50 p.m., and from about 7:45 a.m. to 8:00 a.m. on retreat days. The buses do not idle while they are being loaded; Bus drivers have been instructed to turn off their motors once they park and not turn them again on until the students are loaded on the bus. CCHS will continue to remind bus drivers to not let the buses idle and to not double park on SE 24th Ave.

Goal VI: Limit the number of evening and weekend events that draw large crowds.

Task 1: Do not add new categories of evening and weekend events to the existing School calendar.

The school agrees to not add new categories of after school events to the existing calendar. For example, Central Catholic does not host soccer games or track meets on site, and the school agrees to continue holding those events off site.

Task 2: Limit the number of evening and weekend events that draw large crowds.

When the gym was approved in 1986 (CU 99-85), a condition of approval required a numerical limit on the number of night-time activities (after 5:00 p.m.) which may generate more than 100 vehicles. A numerical limit was not established. The best evidence of the number, frequency and attendance at after-school events at the time the gym was approved is a 1986 letter from the then–Principal of the school, Tim Edwards (no relation to the current Principal, Ron Edwards). According to Mr. Tim Edwards' letter, for the 1986/1987 school year, there were exactly 36 night-time activities that might draw more than 100 vehicles, which was representative of most school years. Mr. Tim Edwards concluded that a maximum of 40 night-time activities per year is a realistic norm. During the 2002/2003 school year, 39 evening events are scheduled that are likely to draw over 100 vehicles.[1] Therefore, the limit of 40 events per year that attract more than 100 vehicles, beginning in the 2003/2004 school year, is a reasonable limit.

[1] In calculating whether or not it was likely that an event would attract more than 100

Not only is the limit of 40 events consistent with the 1986 letter from the school, that number of events is consistent with the available parking in the vicinity of the school. Specifically, of the 298 parking spaces in the 1987 parking management plan area, 196 of the parking spaces are on block faces with only school or cemetery frontage.[2] In other words, there are 196 parking spaces available in the area of the school that are not directly in front of a residence. Although the 1985 gym approval does not provide any reasoning as to why the threshold for regulating events is 100 vehicles, given the availability of on street parking in the vicinity of the school (298) and the number of spaces that do not abut residential uses (196), that threshold is conservative, but reasonable.

Task 3: Reduce or mitigate the impacts of non-student events that draw large numbers of people to the neighborhood.

CCHS uses its facility for both student-affiliated events and non-student events. Neighbors understand and support CCHS's use of its facility for student events. Accordingly, neighbors have requested that CCHS reduce the use of its facility for non-student events that draw large numbers of people to the neighborhood. However, many of the non-student events (i.e. CYO events) are important to CCHS because they are religious-based events and/or events for prospective students. Although these non-student events are related to CCHS's religious mission, the School acknowledges that larger events have an impact on the neighborhood, and therefore agrees to eliminate some non-student events and work to mitigate the remaining events. In order to accomplish this task, CCHS, INCCH and BCA agree to the following:

- CCHS will examine its non-student event schedule and report to INCCH at the BCA meeting on the type and number of non-student events scheduled for Spring 2003.

- Events not related to religious, sporting or educational student activities will be examined to see which events create the most impact and to determine which events might be moved or cancelled (including discontinuing the event during the next school year). Constraints on moving or canceling events may include contractual obligations, the significance of the event for CCHS or lack of need to eliminate the event because appropriate mitigation is identified and implemented.

- Events that are not moved or cancelled will be scrutinized to see how parking and other livability problems associated with the event can be mitigated.

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vehicles, the school assumed that each vehicle parked represented 1.5 people in attendance at the event.

[2] The block faces include the south side of SE Stark St. between SE 21st Ave. and SE 16th Ave., the north side of SE Stark St. between SE 24th Ave. and SE 26th Ave., the south side of SE Pine St. between 24th Ave. and 26th Ave., the east side of SE 24th Ave. between SE Stark St. and Pine St., the west side of SE 24th Ave. between SE Stark St. and SE Oak St., the west side of SE 26th Ave. between SE Stark St. and SE Pine St., and the west side of SE 26th Ave. between SE Stark St. and SE Morrison St..

- CCHS will submit a report at evaluation benchmarks to BCA/INCCH outlining the events moved or cancelled.

Task 4: Assure that events are not held in the PAC and gymnasium simultaneously.

When the PAC was approved in 1991 (CU 112-90), a condition of approval required "Central Catholic will not schedule evening (after 5 p.m.) events in both the gymnasium and the lecture hall-classroom addition [the PAC] on the same night." CCHS will review its calendar and not schedule future simultaneous events.

Goal VII: Reduce the number of evening and weekend event parkers on residential block faces.

The 1987 Parking Management Plan, which Central Catholic continues to implement during the school day, does not apply to evening or weekend events. Even if it did, the Parking Management Plan is less effective for evening and weekend event parkers because many of the vehicles attracted to the School are affiliated with other schools. Those parkers that are not affiliated with CCHS are less likely to be informed about the unique parking situation surrounding the School, and the need to avoid parking in front of residences and to instead park on School or vacant block faces. For example, a fan of a rival high school may not know about the School's agreement with its neighbors and may therefore park on Oak Street when attending a basketball game. In order to enhance the livability of the neighborhood, evening and weekend event parkers should be encouraged to park on block faces occupied by the School, Lone Fir Cemetery or vacant lots, so that residential block faces are available for resident parking.

The following block faces are identified as being most appropriate for evening and weekend event parking:

- South side of SE Stark St. between SE 21st Ave. and SE 26th Ave.,
- North side of SE Stark St. between SE 24th Ave. and SE 26th Ave.,
- South side of SE Pine St. between 24th Ave. and 26th Ave.,
- East side of SE 24th Ave. between SE Stark St. and Pine St.,
- West side of SE 24th Ave. between SE Stark St. and SE Oak St.,
- West side of SE 26th Ave. between SE Stark St. and SE Pine St., and
- West side of SE 26th Ave. between SE Stark St. and SE Morrison St..

There are approximately 196 parking spaces available on the block frontages identified as appropriate for weekend and evening event parkers, which should be adequate for most events.

Task 1: Increase education of all CCHS visitors regarding the need to avoid parking on residential block faces.

Visitors to CCHS do not know to avoid parking on residential block faces unless the School informs them. Therefore, CCHS will increase its parking education outreach efforts to all attendants at evening and weekend events.

- CCHS will include reminders to avoid parking on residential block faces in periodic newsletters home to CCHS parents, on the School's website, and in the School handbook.

- CCHS will provide verbal and written parking information to non-affiliated organizations that use CCHS facilities during the evenings and weekends regarding appropriate parking.

- CCHS will make announcements during evening and weekend events regarding appropriate parking.

Task 2: Increase parking monitoring during evening and weekend events.

For all on-campus dances, all boys basketball games, and girls basketball games that are likely to attract over 100 vehicles, CCHS will hire two Multnomah County sheriffs to patrol the area to ensure that visitors are parking legally, encourage parking on the appropriate block faces, monitor noise, litter, driving and behavior. The sheriffs will patrol the exterior of CCHS before and after the event begins, but their presence is required inside during the event.

Task 3: Provide and post signs directing evening and weekend event parkers to appropriate parking areas.

- Central Catholic will create and provide interested neighbors with lawn signs that encourage school-related parkers to park on S.E. Stark Street and other appropriate parking areas.

- The School will post signs, including large A-Board signs, on its property at key locations directing event parkers to park appropriately.

- CCHS and its neighbors will design the signs jointly and CCHS will have the signs produced as quickly as possible.

Task 4: Investigate alternative pedestrian traffic flow patterns that will encourage event parkers to park on Stark Street.

The School recognizes that an effective way to encourage event patrons to park on SE Stark St. is to route the pedestrian flow of patrons such that parking on SE Stark St. is most convenient. Currently, patrons of events in the gym enter through doors on SE 24th Ave. near the corner of SE Pine St., and many patrons attempt to park in that vicinity. In routing event patrons, the School must consider the need to restrict patrons' access to the School for security and liability purposes (i.e. to avoid vandals in the library during a volleyball game). Given the possible safety constraints of full access to the School, CCHS and its neighbors will consider innovative solutions such as simply moving the ticket sales booth from the gym entrance to the SE Stark St. main entrance.

Task 5: Investigate City implemented area parking program.

It is possible that a City implemented area parking program could address evening and weekend event parkers. This option is discussed in Goal III.

Goal VIII: Increase student participation in the Buckman Community.

Task 1: CCHS will continue its commitment to community service in Buckman.

Central Catholic High School has been a part of the Buckman community for over 60 years, and takes its role as a member of the community seriously. Central Catholic's students are required to perform community service projects. The School's students and staff have contributed literally hundreds of hours of service to the immediate neighborhood, including working at Buckman Elementary School, working on cleanup projects, stuffing envelopes, canvassing the neighborhood handing out flyers, and distributing newsletters. CCHS will continue its commitment to participating in the Buckman Community.

Task 2: CCHS students will participate in the BCA monthly meetings.

Members of the CCHS faculty attend the monthly BCA meetings. To increase student accountability and encourage civic participation, members of the CCHS student body will also attend the monthly BCA meetings.

Task 3: Investigate having CCHS students involved in the BCA quarterly newsletter.

Investigate having CCHS students participate in the writing, editing, publishing and distribution of BCA quarterly newsletter. Explore opportunities for students to fund the materials and printing of the newsletter.

Goal IX: Continue the existing dialogue between CCHS, BCA and INCCH after the conditional use permit is approved.

Task 1: CCHS will meet with INCCH and any interested members of BCA twice a year.

A CCHS representative attends every BCA meeting. So that CCHS issues do not dominate the BCA agenda, CCHS and INCCH will meet twice a year to address any concerns. CCHS and INCCH will work together to determine which months are most convenient for members to attend, but one meeting should occur after the school year ends and the next school year begins, and the other meeting should occur mid-school year. The meeting that occurs between school years should occur early enough so that any changes to the School schedule or policies can be incorporated into the CCHS Student Handbook.

Timeline

The school and the neighbors have agreed to the following timeline for implementation and evaluation.

Goal/Task	Start Date	Evaluation Date
Goal I: Implement and Strengthen Existing Parking Plan		
Task 1	Fall 2002	June 2003
Task 2	Fall 2002	June 2003
Task 3	Fall 2002	June 2003
Task 4	Fall 2002	June 2003
Task 5	Fall 2002	June 2003
Task 6	Fall 2002	June 2003
Task 7	August 2003[3]	December 2003
Task 8	Fall 2002	June 2003
Task 9	Fall 2002	June 2003
Task 10	Fall 2002	June 2003
Task 11	January 2003	June 2003
Task 12	January 2003	June 2003
Task 13	March 2003	June 2003
Goal II: Reduce Unregistered Drivers		
Task 1	August 2003	December 2003
Task 2	Fall 2002	June 2003
Task 3	Fall 2003	June 2003
Goal III: City Enforced Area Parking Permit Program		
Task 1	March 2003	June 2003
Task 2	June 2003	August 2003
Task 3	August 2003	October 2003
Task 4	October 2003	December 2003
Goal IV: Off-Street Parking Alternatives		
Task 1	March 2003	July 2003
Task 2	July 2003	December 2003
Goal V: Reduce Traffic Congestion on SE 24th and 26th Avenues.		
Task 1	January 2003	June 2003
Goal VI: Limit Evening and		

[3] The student handbook for the 2002/2003 school year includes the current parking penalty provisions. CCHS feels the implementation of the new, stricter penalty provisions will be more successful if it is begun at the beginning of the school year and notice is given in the student handbook.

Weekend Events		
Task 1	Fall 2002	June 2003
Task 2	August 2003	December 2003
Task 3	January 2003	March 2003
Task 4	January 2003	May 2003
Goal VII: Evening and Weekend Event Parking		
Task 1	January 2003	June 2003
Task 2	December 2002	June 2003
Task 3	January 2003	June 2003
Task 4	January 2003	June 2003
Task 5	March 2003	June 2003
Goal VIII: Increase Participation in the Buckman Community		
Task 1	Fall 2002	June 2003
Task 2	January 2003	June 2003
Task 3	January 2003	June 2003
Goal IX: Continue Dialogue		
Task 1	June – August 2003[4]	November 2003 – February 2004

[4] CCHS and INCCH will work together to determine what bi-annual dates are most convenient for all members, but one meeting will be held between school years and the other will be held mid-school year.

Central Catholic High School

Initial: _____
On behalf of CCHS

Name: RON EDWARDS

Date: 12/16/02

Immediate Neighbors of Central Catholic High

Initial: _____
On behalf of INCCH

Name: Marie Christensen

Date: 12/16/02

Buckman Community Association

Initial: _____
On behalf of BCA

Name: Jack Maynard / Jan McCain

Date: 12-16-02 / 12/16/02