

COLUMBIA COUNTY PLANNING COMMISSION
Supplemental Analysis of TGM dated 1/27/2025

February 3, 2025

Determination of Similar Use and Site Design Review for the Old St. Helens Golf Course

HEARING DATE: February 3, 2025

FILE NUMBER: DSU 25-01 & DR 25-04

APPLICANT/OWNER: Columbia County Sports LLC (Represented by Matt Treat)
506111 Hemlock Avenue, Scappoose, OR 97056.

PROPERTY LOCATION: 57246 Hazen Road, Warren, OR 97053

TAX MAP ID: 4213-D0-00103 (#8930)
4213-A0-03000 (#8923)

ZONING: Community Service - Recreation (CS-R)
Rural Residential - 5 (RR-5)

PROPERTY SIZE: Approximately 77-acres
Approximately 0.55-acres

REQUEST: Columbia County Sports LLC has applied for a Determination of Similar Use Application (DSU 25-01) to allow a frisbee golf course, wedding/event venue, putting course, golf simulators, driving range, indoor/outdoor sports, golf course, practice greens, club house and restaurant, and a Site Design Review Application (DR 25-04) for a frisbee golf course with check-in stand and associated operations.

APPLICATION COMPLETE: 11/08/2024 **150 DAY DEADLINE:** 04/07/2025

Background

After the staff report was finalized, the applicant submitted a revised Trip Generation Memo (TGM), dated 1/27/2025, prepared by the engineer of record, Jennifer Danziger. The updated TGM was submitted the same day, and shortly before the publication of the staff report, leaving little time for staff to make revisions prior to publication. As a result, supplemental findings have been prepared to address the updated TGM and incorporate comments provided by Columbia County Public Works. Additionally, minor changes have been made to Staff's Recommendation

to the Planning Commission, which are meant to clarify conflicting language within the Staff Report published on 1/27/2025.

SUPPLIMENTAL FINDINGS

Section 1020 COMMUNITY SERVICE - RECREATION CS-R

[...]

1024 Restrictions and Conditions: These public facilities have a direct impact upon the adjoining properties. The Commission will study each request to establish a new CS-R use and shall attach adequate conditions to the approval to insure the adverse impact of the recreational use upon the adjoining land uses have been mitigated. A Site Design Review for a Conditional Use in this zone may be processed concurrently with the Conditional Use Permit with a single hearing and a single fee which will be the higher of the 2 permit fees.

Conditions shall include:

- .1 Landscaping, berming, fencing, or screening.
- .2 Off-street parking in accordance with Section 1400.
- .3 Limitations on the type and amount of external lighting.
- .4 Limitations on the number and location of access points which connect with County roads or public ways.
- .5 The Commission may attach as many conditions, such as setbacks, screening, off-street parking and unloading, construction standards, maintenance and landscaping requirements, as it deems necessary to protect the public health, safety, welfare, the adjoining property owners and the public interest.
- .6 A new CS-R use within an Urban Growth Boundary shall be served by public water and public sewer when appropriate. The Commission may waive the requirement for connection to public sewer if it can be shown that the proposed use can be safely served in another manner. In this case, the Commission shall require that the CS-R use be connected to public sewer when it becomes available to the site.

Finding 4: Comments submitted by Public Works regarding the revised TGM highlighted the criteria in CCZO Section 1024, which states how the Planning Commission “*shall attach adequate conditions to the approval to (ensure) the adverse impact of the recreational use upon adjoining land uses have been mitigated*”. Additionally, Public Works’ expressed concerns about anticipated traffic volumes on Hazen Road and the potential impacts on nearby residences, which they asserted are best evaluated through a TIA. Finding 4 of the Staff Report evaluated the proposal submitted

for DSU 25-01 and DR 25-04 in relation to the criteria in CCZO Section 1024. However, staff did not include a detailed analysis of transportation impacts within this finding, as these were addressed elsewhere within the report.

In consideration of Public Works' comments, staff agrees that traffic related impacts of the recreational use upon adjoining land uses are best evaluated through the submission and review of a TIA. While the requirement of a TIA does not affect staff's ability to recommend approval of DSU 25-01, staff finds that the submission of a TIA cannot be deferred as a condition of approval for DR 25-04, as it may identify deficiencies and require improvements to the transportation system that could impact findings of the Staff Report.

Section 1400 OFF-STREET PARKING AND LOADING OP

[...]

1417 Unspecified Uses: Any use not specifically listed in the foregoing list shall have the requirements of the listed use or uses deemed equivalent by the Director.

Finding 17: Frisbee golf is not explicitly listed as a use with a corresponding parking requirement in CCZO Section 1416. Staff maintains that it is appropriate to determine required parking based on projected frisbee golf players and assumed vehicle occupancy ratios. The revised TGM updates assumptions for regular weekday operations, estimating an average vehicle occupancy of 1.25 players per vehicle, while maintaining the original assumption that 1.5 players per vehicle, is appropriate for tournaments. Additionally, the revised TGM assumes one employee on-site for regular operations and up to five employees on-site for tournaments, each of whom are likely to travel alone, resulting in a vehicle occupancy of one staff member per vehicle.

Regular Operations

For regular operations, the parking calculation in the original Finding 17 relied solely on inbound trips, assuming they represented the total number of vehicles requiring parking at any given time. However, this approach did not account for vehicle overlap, meaning the presence of vehicles already on-site was overlooked. Regardless, the revised TGM estimates that the frisbee golf course is *"anticipated to attract up to 20 players on weekdays during the peak summer and shoulder seasons and fewer players (estimated at 10-12) during the off season"*. Given these assumptions, staff finds the existing 65 parking spaces remain sufficient for regular operations.

Tournament Operations

The applicant has provided updated trip estimates for the proposed Staggered Tee Time Tournaments. Although the two TGM's provide useful estimates for peak hour trips, and anticipated player time on-site, they do not account for vehicle overlap. Therefore, it is difficult for staff to use trips to and from the site as an accurate indicator of true parking demand. Staff maintains that based on the submitted documentation, parking required for tournament

operations is best identified by using the total number of players anticipated on-site for the entire tournament event.

Therefore, the parking requirements based on the revised TGM dated 1/27/2025 are as follows:

Shotgun-Style Tournament *72 players unchanged*	
Players	72 Players
Vehicles (<i>assumed vehicle occupancy of 1.5 players</i>)	48 Vehicles
Parking for Players	48 Spaces
Parking for Staff	5 Spaces
Total Parking Required	53 Spaces
Staggered Tee Time Tournament (Players reduced from 150 to 144)	
Players	144 Players
Vehicles (<i>assumed vehicle occupancy of 1.5 players</i>)	96 Vehicles
Parking for Players	96 Spaces
Parking for Staff	5 Spaces
Total Parking Required	101 Spaces

As noted in the Staff Report, the submitted parking plan includes 65 spaces, with 3 ADA spaces, (2 Standard, 1 Van Accessible). While this is sufficient for standard operations and Shotgun-Style Tournaments, Staggered Tee Time Tournaments are found to require 101 parking spaces, which exceeds the capacity of the existing lot. Staff has revised recommended Condition No. 9(c), to reflect changes in required parking. As conditioned, Staff finds that the proposal for DR 25-04 can satisfy required parking requirements.

Continuing with Section 1450 of the Columbia County Zoning Ordinance:

Section 1450 TRANSPORTATION IMPACT ANALYSIS

1450 Transportation Impact Analysis: A Transportation Impact Analysis (TIA) must be submitted with a land use application if the proposal is expected to involve one or more of the conditions in 1450.1 (below) in order to minimize impacts on and protect transportation facilities, consistent with Section 660-012-0045(2)(b) and (e) of the State Transportation Planning Rule.

- .1 Applicability – A TIA shall be required to be submitted to the County with a land use application if the proposal is expected to involve one (1) or more of the following:
 - A. Changes in land use designation, or zoning designation that will generate more vehicle trip ends.
 - B. Projected increase in trip generation of 25 or more trips during either the

AM or PM peak hour, or more than 400 daily trips.

- C. Potential impacts to intersection operations.
- D. Potential impacts to residential areas or local roadways, including any non-residential development that will generate traffic through a residential zone.
- E. Potential impacts to pedestrian and bicycle routes, including, but not limited to school routes and multimodal roadway improvements identified in the TSP.
- F. The location of an existing or proposed access driveway does not meet minimum spacing or sight distance requirements, or is located where vehicles entering or leaving the property are restricted, or such vehicles are likely to queue or hesitate at an approach or access connection, thereby creating a safety hazard.
- G. A change in internal traffic patterns may cause safety concerns.
- H. A TIA is required by ODOT pursuant with OAR 734-051.
- I. Projected increase of five trips by vehicles exceeding 26,000-pound gross vehicle weight (13 tons) per day, or an increase in use of adjacent roadways by vehicles exceeding 26,000-pound gross vehicle weight (13 tons) by 10 percent.

Finding 18: Public Works reviewed the revised TGM dated 1/27/2025 and concurred with staff's interpretation that the proposal still triggers the submittal of a Transportation Impact Analysis (TIA) under CCZO Sections 1450.1(B) and 1450.1(D). The revised TGM reduces estimated trips for regular operations to 1 AM peak trip, 8 PM peak trips, and 34 total daily trips, which falls below the TIA threshold established by CCZO Section 1450.1(B). However, Public Works noted that these figures are based on assumptions rather than surveyed data from comparable frisbee golf courses, making it unclear as to whether actual operations would remain under the peak trip threshold.

For tournaments, the revised TGM maintains nearly identical trip estimates as the original memo, except for the reduction in Staggered Tee Time tournament participants from 150 to 144. However, Shotgun-Style and Staggered Tee Time Tournaments still generate 48 and 32 peak-hour trips respectively, exceeding the 25-trip threshold in 1450.1 (B). Public Works confirmed that the TIA trigger applies regardless of whether the peak-hour trips occur on weekdays or weekends and noted that determining Hazen Road's actual peak hours would require traffic counts, which are part of a TIA. Additionally, Public Works reaffirmed that CCZO 1450.1(D) is met due to the potential impact on residential areas from increased traffic. Hazen Road's substandard right-of-way, lack of shoulders, and nearby residential zoning indicated that the

proposed frisbee golf course could create adverse impacts to these areas, requiring further study. If the Planning Commission elects to approve DR 25-04, staff recommends the addition of Condition No. 10 (c), requiring that the sight distance at the driveway be field-checked and landscaping trimmed to provide adequate site lines. Staff concludes that CCZO Sections 1450.1(B) and 1450.1(D) are applicable to the proposed use in this application, triggering the requirement for a TIA, which has not been received. As a result, the conclusion within Finding 18 of the published Staff Report remains unchanged. Staff finds that a TIA is required to be submitted for review prior to the approval of DR 25-04.

- .2 Consistent with the County's Guidelines for Transportation Impact Analysis (TIA), a landowner or developer seeking to develop/redevelop property shall contact the County at the project's outset. The County will review existing transportation data to establish whether a TIA is required. It is the responsibility of the applicant to provide enough detailed information for the County to make a determination. An applicant should have the following prepared, preferably in writing:

- A. Type of uses within the development
- B. The size of the development
- C. The location of the development
- D. Proposed new accesses or roadways
- E. Estimated trip generation and source of data
- F. Proposed study area

If the County cannot properly evaluate a proposed development's impacts without a more detailed study, a TIA will be required. The County will provide a scoping summary detailing the study area and any special parameters or requirements, beyond the requirements set forth in the County's Guidelines for Transportation Impact Analysis, when preparing the TIA.

Finding 19: The staff report published on 1/27/2025 stated in Finding 19 that a TIA is required for the proposed development based on the conclusions outlined in Finding 17; however, this was an error, as the correct reference should have been Finding 18, which evaluates compliance with CCZO Section 1450.1 and determines the TIA requirement. As previously mentioned, because the revised TGM does not alter staff's determination that a TIA is required, staff finds that the original Finding 19 remains valid and unchanged.

***SUPPLEMENTAL* STAFF COMMENTS, CONCLUSION AND RECOMMENDATION:**

Supplemental Staff Comments

Language within the Staff Report published on 1/27/2025 pertaining to Staff's Recommendation to the Planning Commission contained errors and conflicting language, which the following revisions are meant to correct. The revised language does not modify staff's overall recommendation to the Planning Commission regarding approval/denial, rather it is intended to provide clarification in addition to reflecting the revision of Condition No. 9 (c) resulting from the analysis conducted in supplemental Finding 17, and the addition of Condition No. 10 (c) to reflect findings made in the revised TGM. Staff's revised recommendation reads as follows:

STAFF COMMENTS, CONCLUSION AND RECOMMENDATION:

Planning Staff recommends the Planning Commission, **APPROVE** DSU 25-01, finding the proposed use of the subject property for an 18-hole frisbee golf course, check-in shed, 9-hole traditional golf course, clubhouse and restaurant, putting course, practice greens, driving range, golf simulators, events barn, and indoor and outdoor sports is similar to and compatible with those uses permitted in the CS-R Zone subject to the following condition:

1. This Determination of Similar Use shall be applicable only to this Community Service – Recreation (CS-R) zoned property associated with Tax Map ID 4213-D0-00103 and shall not apply to other parcels within this tract that contain different zoning designations.

Planning Staff recommends the Planning Commission **DENY** DR 25-04, for the implementation and operation of an 18-hole frisbee golf course and check-in shed, based on staff's findings in the report published on January 27, 2025, and the supplemental findings listed above, due to the absence of a Transportation Impact Analysis (TIA) which is necessary to evaluate the anticipated traffic impacts of the proposed development and required under CCZO 1450.1 (B) and 1450.1(D).

To the extent the Planning Commission is inclined to approve DR 25-01, notwithstanding staff's recommendation, staff provides the following proposed and revised approval conditions to ensure compliance of DR 25-04 with the applicable criteria:

2. This permit shall become void unless the proposal has commenced in conformance with all conditions and restrictions established herein within the two-year validity period. Extensions of time may be granted by the Planning Commission if requested in writing with the appropriate fee before the expiration date, given the applicant is not responsible for failure to develop.
3. The applicant shall obtain all necessary building, plumbing, mechanical, and electrical permits for the subject proposal.
4. A 50' Riparian Corridor extending from the top-of-bank of McNulty Creek and associated

wetlands on the subject property shall be maintained.

5. The approval of DSU 25-01 is limited to a determination that the proposed 18-hole frisbee golf course, check-in shed, 9-hole traditional golf course, clubhouse and restaurant, putting course, practice greens, driving range, golf simulators, events barn, and indoor and outdoor sport are similar to and compatible with those uses permitted in the CS-R Zone, and DR 25-04 is limited to the design approval, implementation, and operation of an 18-hole frisbee golf course and check-in shed. All other uses proposed for future phases shall be reviewed under separate design review applications for consistency with CCZO Section 1025.
6. No grading, filling, or construction of permanent structures within the identified flood hazard area is authorized by the approval of DSU 25-01 and DR 25-04. Any future activities in these areas shall be reviewed for consistency with the criteria in CCZO Section 1100.
7. No permanent structures shall be constructed as part of this phase without obtaining separate Design Review approval and required permits.
8. Future phases outlined in DSU 25-01 must be submitted as separate Design Review applications for evaluation of compliance with zoning, infrastructure, and environmental requirements.
9. The following shall be completed **prior to the acceptance of a Final Site Plan:**
 - a. The applicant shall delineate the location of the McNulty Creek and its 50-foot riparian corridor on the final site plan and demonstrate that all proposed features maintain their temporary and removable nature and are consistent with the requirements of CCZO Section 1172.
 - b. The applicant shall provide detailed documentation for all proposed signage to ensure compliance with CCZO Section 1300.
 - c. The applicant shall designate and prepare a temporary overflow parking area for frisbee golf tournaments, sufficient to meet a demand of 101 spaces. The overflow parking area shall demonstrate consistency with dimensional standards required by CCZO Section 1400.
 - d. The applicant shall identify the names and location of all vegetation intended to reduce the visual impact of the existing parking lot.
 - e. The applicant shall submit documentation which confirms that the proposed portable toilets are owned and maintained by a Licensed Sewage Disposal service.
10. The following shall be complete **prior to the commencement of operations:**
 - a. The applicant shall obtain a Road Access Permit for the existing connection to

Hazen Road.

- b. Confirmation from Columbia County Fire and Rescue that they have reviewed the Final Site Plan for compliance with minimum Fire Safety Standards.
- c. Columbia County Public Works shall verify sight distance at the driveway and ensure landscaping is trimmed to provide adequate site lines.