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Щоб попросити переклад або спеціальні послуги для осіб з особливими потребами, зверніться до нас, скориставшись такими контактними даними: **bcc@clackamas.us** | **503-655-8581**.

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Clackamas County

www.clackamas.us

CLACKAMAS COUNTY

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December 3, 2026 BCC Agenda Item: _____

Board of County Commissioners
Clackamas County

**Adoption of a Previously Approved Zone Change in File No. Z0155-26.**
**No fiscal impact. No County General Funds are involved.**

**Previous Board Action/Review:** Land Use Hearing 10/27/2026
**Performance Clackamas:** Public Trust in Good Government
**Counsel Review:** Yes **Procurement Review:** N/A
**Contact Person:** Caleb Huegel **Contact Phone:** 503-655-8362

**EXECUTIVE SUMMARY:** The application in File No. Z0155-26 requests that Clackamas County's zoning maps be changed to add the Historic Landmark (HL) overlay zone to the Carus Schoolhouse. The extent of the proposed HL overlay zone is the 3,400-square-foot area of the schoolhouse footprint located at 22575 S Highway 213, described as T3S, R2E, Section 28, Tax Lot 490, W.M.

The Historic Review Board (HRB) held a public hearing on October 8, 2026, to consider the proposal. The HRB voted 4-0 to recommend approval of the proposal.

The Board of County Commissioners (BCC) held a public hearing on October 27, 2026, to consider the proposal. The BCC voted 4-0 to approve the application subject to conditions.

The BCC then directed staff to draft an order and findings consistent with its decision. A Board Order implementing the decision, and findings in support of the order, are attached.

**RECOMMENDATION:** Staff recommends the BCC adopt the attached Board Order and findings.

Respectfully submitted,

Caleb Huegel
Assistant County Counsel

For Filing Use Only

# BEFORE THE BOARD OF COUNTY COMMISSIONERS

## OF CLACKAMAS COUNTY, STATE OF OREGON

| | |
|---|---|
| In the Matter of File No. Z0155-26, an Application by Cindy Lou Pease for a Zone Change for Property Described as T3S, R2E, Section 28, Tax Lot 490, W.M. | Board Order No.<br><br>*Page 1 of 1* |

**Whereas,** Cindy Lou Pease has submitted an application for a zone change to add the Historic Landmark (HL) overlay zone to a 3,400-square-foot area of property located at 22575 S Hwy 213, described as T3S, R2E, Section 28, Tax Lot 490, W.M., as shown on Exhibit A, attached hereto and by this reference incorporated herein, to facilitate ongoing preservation efforts for the Carus Schoolhouse; and

**Whereas,** after appropriate notice, a public hearing was held before the Historic Review Board (HRB) on October 8, 2026, at which testimony and evidence were presented and at which the HRB voted 4-0 to recommended approval of the application; and

**Whereas,** after appropriate notice, a public hearing was held before the Board of County Commissioners (BCC) on October 27, 2026, at which testimony and evidence were presented and at which the BCC voted 4-0 to approve the application subject to conditions;

**NOW, THEREFORE, the Clackamas County Board of Commissioners does hereby order as follows:**

**Section 1:** The requested zone change is approved subject to the conditions identified in Exhibit B, attached hereto and by this reference incorporated herein.

**Section 2:** The BCC adopts the findings shown in Exhibit B.

**DATED** this 3rd day of December 2026

**BOARD OF COUNTY COMMISSIONERS**

_____
Chair

_____
Recording Secretary

**Board Order Exhibit A:**
**Z0155-26**
**Carus Schoolhouse Zoning Designation**
**Historic Landmark Overlay**




Carus Schoolhouse Footprint

**Clackamas County Planning and Zoning Program**
**Department of Transportation and Development**
Development Services Building
150 Beavercreek Road | Oregon City, OR 97045
503-742-4500 | zoninginfo@clackamas.us
www.clackamas.us/planning

# EXHIBIT B
# FINDINGS FOR FILE NO. Z0155-26:
# HISTORIC LANDMARK OVERLAY ZONE CHANGE

## SECTION I: GENERAL INFORMATION

**CASE FILE NO.:** Z0155-26

**PROPOSAL:** Placement of the Historic Landmark (HL) overlay zone on the property in the location of the Carus Schoolhouse.

**STAFF CONTACT(S):** Joy Fields, Principal Planner, 503-742-4510, jfields@clackamas.us

**LOCATION:** 22575 S Hwy 213, Oregon City, OR 97045

**MAP AND TAX LOT:** T3S, R2E, Section 28, Tax Lot 490, W.M.

**APPLICANT(S):** Cindy Lou Pease

**OWNER(S):** Cindy Lou Pease

**SUBJECT PROPERTY AREA:** 30.02 acres; 3,400 square feet proposed for placement of HL overlay zone

**CURRENT ZONING:** Exclusive Farm Use (EFU)

**COMMUNITY PLANNING ORGANIZATION:** Hamlet of Beavercreek

**APPLICABLE APPROVAL CRITERIA:** Clackamas County Comprehensive Plan; Clackamas County Zoning and Development Ordinance Sections 202, 707, 1202, and 1307

## SECTION II: CONCLUSION AND CONDITIONS OF APPROVAL

The Board of County Commissioners (the Board) finds that the application satisfies all applicable state and county criteria to place the HL overlay zone on the property in the location of the Carus Schoolhouse. The Board **APPROVES** the application subject to the following conditions:

1. The Clackamas County *Zoning* map shall be amended to show the subject property as having an HL overlay zone in addition to the underlying EFU zoning.

## SECTION III: BACKGROUND

The property is located on the northwest corner of S Mueller Rd and SE Hwy 213. It is a working farm (Evans Farms) that is relatively flat, is outside of mapped flood hazard areas, and has no County-regulated mass-movement or soil hazard areas, stream conservation areas, mapped wetlands, or other historic landmarks.

The property is approximately 2,800 feet north of the Canby School District #86 campus, where the Carus Schoolhouse was originally built in 1926. The property consists of a tract that contains over 130 acres and has approximately 519 feet of frontage on SE Hwy 213, a major arterial, and 1,145 feet of frontage on S Mueller Rd, a local street.

The structure known as the Carus Schoolhouse was previously located at 14412 S Carus Rd on the corner of S Carus Rd and S Hwy 213. On February 6, 1992, the Carus Schoolhouse received land use approval to be designated a local historic landmark through File No. Z1293-90 and Board Order No. 92-159. In 2023, the Canby School District received land use approval, through File No. Z0523-22, to move or demolish the historic schoolhouse to allow improvements to the outside and inside of a modern school on the previous property. With support from the community, Friends of the Historic Carus Schoolhouse was created and was able to purchase and relocate the historic schoolhouse to the current property with Building Permit No. B0627423. This application is to designate the Carus Schoolhouse as a historic landmark in its new location.

The Cultural Resource Inventory of 1984, SHPO File No. 1134 (SHPO Survey), states:

> "*Practically no changes to exterior or interior. This is one of 27 schools in Clackamas County extant from the Motor Age (1914-1940). The Carus School has a projecting gable porch, gable roof and purlins and brackets, more closely resembling a Craftsman/; Bungalow dwelling.*
>
> "Known locally as the 'White Building,' the school, constructed in 1926, has served the community for several decades as a meeting hall, community center and Sunday School for the Methodist Church across the street.
>
> *"The Carus School is also significant as a fine example of the Bungalow/Craftsman style. Virtually unaltered since construction, the school has many features commonly associated with the stylistic type. The broad gable roof, bargeboards, purlins and braces are all typical features. The porch, a simple gabled projection, is supported by plain posts and enclosed balustrade. The quality of design is rarely found in non-residential buildings."*

It is unknown how many other school buildings from the Motor Age have survived in Clackamas County since 1984.

In the application, the applicant highlights that "[*t*]*he 1926 Craftsman style two-room schoolhouse was fittingly moved to Evans Farms, whose lineage includes Clarence Evans, one of the original builders of the school. The school is accessible by driveways off Hwy 213 and Mueller Road, which honors the family of Clarence's wife, Louise Mueller*."

The property is currently zoned EFU and would retain that underlying zoning. The designation of the Carus Schoolhouse as a historic landmark would result in the addition of an HL overlay zone being placed on the property. The extent of the overlay zone would be limited to the footprint of the structure, as requested by the applicant.

**Figure 1: Aerial View of the Carus Schoolhouse on the Property**




## SERVICE PROVIDERS:

1. Onsite Wastewater: The property is not located within a public or private sewer district. Sewage disposal is accommodated on site by a DEQ-approved septic system.

2. Water: The property is served by an on-site well.

3. Fire Protection: Clackamas RFPD #1

**NOTICE:** These applications were processed consistent with the noticing requirements in ZDO Section 1307, *Procedures*, and with state noticing requirements. Specifically, the County provided notice to interested agencies, local governments, and property

owners within 2,640 feet of the property. The notice to property owners, public notices, and public hearings ensure an opportunity for citizens to participate in the land use process.

**PUBLIC HEARINGS:** Two public hearings were held to consider the application:

1. October 8, 2026: A public hearing was held before the Historic Review Board. The applicant, joined by Friends of the Historic Carus Schoolhouse, was the only party who provided testimony. No significant issues were identified, and the Commission voted 4-0 to recommend approval of the application.

2. October 27, 2026: A public hearing was held before the Board. Again, the applicant was the only party who provided testimony. The Board voted 4-0 to approve the application subject to conditions.

## SECTION IV: FINDINGS

The application is subject to Clackamas County Zoning and Development Ordinance (ZDO) Sections 202, 707, 1202, and 1307. ZDO Sections 202 and 1307 provide only definitions and procedural requirements which do not warrant separate written findings. The Board has reviewed ZDO Sections 707 and 1202 in conjunction with the application and makes the following findings.

### A. ZDO 707: Historic Landmark (HL), Historic District (HD), And Historic Corridor (HC)

#### 707.01 Purpose

*Section 707 is adopted to:*

*A. Implement the goals and policies of the Comprehensive Plan for Historic Landmarks, Districts, and Corridors;*

*B. Promote the public health, safety, and general welfare by safeguarding the County's heritage as embodied and reflected in its historic resources;*

*C. Provide for the identification, protection, enhancement, and use of sites, structures, corridors, objects, and buildings within the County that reflect special elements of the County's architectural, archeological, artistic, cultural, engineering, aesthetic, historical, political, social, and other heritage;*

*D. Facilitate restoration and upkeep of historic buildings, structures or other physical objects or geographical areas;*

*E. Encourage public knowledge, understanding and appreciation of the County's history and culture;*

F. *Foster community and neighborhood pride and sense of identity based on recognition and use of cultural resources;*

G. *Promote the enjoyment and use of historic and cultural resources appropriate for the education and recreation of the people of the County;*

H. *Preserve diverse architectural styles reflecting phases of the County's history; and encourage complimentary design and construction impacting cultural resources;*

I. *Enhance property values and increase economic and financial benefits to the County and its inhabitants;*

J. *Identify and resolve conflicts between the preservation of cultural resources and alternative land uses; and*

K. *Integrate the management of cultural resources and relevant data into public and private land management and development processes.*

**Finding:** In the application narrative, the applicant states, "*The historic status designation will help protect the building and facilitate the restoration. The neighborhood pride in saving the building has encouraged public knowledge, understanding and appreciation of the County's history. Once refurbished and open for the public use, there will be increased economic and financial benefits to the community as well*."

The property owner received land use approval in 2025 to operate a community center in the Carus Schoolhouse structure through File No. Z0275-25. Through these neighborhood efforts to preserve the structure and use it for the community, the Carus Schoolhouse will continue to foster community pride and a sense of identity based on the recognition and use of cultural resources. Using the Carus Schoolhouse as a community center will promote the enjoyment and use of the historic resource. As the applicant states, the designation of the Carus Schoolhouse as a local historic landmark will help facilitate the restoration and upkeep of the structure so that it can support use by and foster pride in the community. Therefore, placing the HL overlay zone on the Carus Schoolhouse structure will support the intent of ZDO Section 707 that implements the goals and policies of the Comprehensive Plan. **This criterion is met.**

**707.02 Applicability**

A. *Section 707 applies to designated Historic Landmarks, Historic Districts, and Historic Corridors.*

**Finding:** The application is a request to designate a historic landmark. Thus, ZDO Section 707 applies.

*B. Historic Landmark: A site, structure, or object may be zoned Historic Landmark if it is listed on the National Register of Historic Places, or if it is rated as significant under the County's procedure for evaluating historic resources under the specific architectural, environmental, and historic association criteria. A site or structure must receive a minimum of 40 points under the following criteria to be considered for Historic Landmark status:*

**Finding:** The Board has considered the application materials, the SHPO Survey, and the original land use file that designated the Carus Schoolhouse as a local historic landmark. The Board makes the following findings and scoring for the structure, as recommended by the Historic Review Board:

*1. Architectural Significance*

*a. It is an early (50 years or older), or exceptional, example of a particular architectural style, building type, or convention. (up to 10 points)*

The structure is older than 50 years. According to the SHPO Survey, "[*t*]*he school may be evaluated as an example of an early 20th century school building*," and "[*t*]*he Carus School is also significant as a fine example of the Bungalow/Craftsman style. Virtually unaltered since construction, the school has many features commonly associated with the stylistic type*." Based on the age and notes in the SHPO Survey that identify the structure as a prime example, the Board assigns 7 points for architectural significance.

*b. It possesses a high quality of composition, detailing, and craftsmanship. (up to 4 points)*

According to the SHPO Survey, the structure is a "*fine example of the Bungalow/Craftsman style*." The decorative features identified in the SHPO Survey include exposed rafters, purlins and brackets, and bargeboards. The unique feature identified in this application is a divider that created a partition between rooms but that could be lifted by a pulley system into the rafters, creating one large gathering place. The divider is still intact. The description in the application in File No. Z0523-22 identified the structure as including "*lap siding, gabled porch, decorative truss, and glazed door with transom and sidelights*." Elevations from the 2023 building permit and street image from the road show that the craftsmanship is still high-quality, with details and composition that remain from the original design of the structure. Based on this, the Board assigns 4 points for the quality of composition, detailing, and craftsmanship.

*c. It is a good, or early, example of a particular material or method of construction. (up to 4 points)*

The applicant notes that the "*Carus school was established in 1885. The original structure was a log building located across the highway from Evans Farms. In 1926, a new structure was built with locally milled timber, some of which came from Evans Farms. The schoolhouse had several amenities, including a stage and indoor plumbing*." Having a historic structure made from locally milled timber in the Carus community provides a good example of a particular material that may have been more commonly used in the early 1920s compared with today. Based on this, the Board assigns 3 points for providing an example of a particular material in the construction of a historic structure.

*d. It retains, with little or no change, its original design features, materials, and character. (up to 7 points)*

When the structure was moved to the current property, the community worked with an architect to ensure that its integrity would be retained as it was moved. Based on the information in the record, there has still been little or no change to the structure's original design features and character. Thus, the Board assigns 6 points.

*e. It is the only remaining, or one of the few remaining, properties of a particular style, building type, design, material, or method of construction. (up to 10 points)*

Based on the SHPO Survey, there were 27 schools in Clackamas County that dated from the Motor Age (1914-1940), and "[*t*]*he Carus School is one of two schools in the Oregon City-Beavercreek study area which date from this period. The Carus School is significant as an example of this building type*." It is unknown how many of the 27 schools from the Motor Age remain in Clackamas County. However, the fact that this is one of the two identified 40+ years ago in the Oregon City-Beavercreek study area suggests that it is one of the few remaining. Based on this the Board assigns 8 points for the historic structure being one of the few remaining historic schoolhouses.

*2. Environmental Significance*

*a. It is a conspicuous visual landmark in the neighborhood or community. (up to 10 points)*

Located on the corner of S Mueller Rd and S Hwy 213, the structure continues to be a conspicuous visual landmark in the neighborhood or community. Although it is set back, the structure is still visible from the road. Based on this visibility, the Board assigns 8 points.

*b. It is well-located considering the current land use surrounding the property, which contributes to the integrity of the pertinent historic period. (up to 4 points)*

As the applicant notes, the original Carus school was located across the highway from Evans Farms. Thus, having the structure located on Evans Farms, clustered with a historic barn, contributes to the historic integrity of the structure. The property is located just north of the Isaac Farr Division Land Claim. As noted in the SHPO Survey, farming, whether it was subsistence farming or large-scale specialized farming, was common in the area south of Oregon City. The applicant identifies that the owner of Evans Farms has a direct connection to and is a descendant of some of the early settlers in the area, the Vonderahe family. The Vonderahe house, previously located on the property, was the location of the first post office of Carns (Carus). Thus, the presence of the barn, the historical site of the Carus post office, the location across the road from the original Carus school, and the agricultural use of the property all lend to the integrity of the structure, even though it has been relocated. Based on this, the Board assigns 2 points.

c. *It consists of a grouping of interrelated elements including historic structures, plant materials and landscapes, viewsheds and natural features. (up to 10 points)*

As noted above, the structure was moved to a location that has an active farm and historic barn. However, there are no other interrelated elements apart from the farming landscape and visibility from the road. Based on this, the Board assigns 2 points.

d. *It is an important or critical element in establishing or contributing to the continuity or character of the street, neighborhood, or community. (up to 7 points)*

The SHPO Survey states, "*The school constructed circa 1926, has served the community for several decades as a meeting hall, community center and Sunday School for the Methodist Church (SHPO #1133) across the street. This pattern, whereby the school building served the community in numerous capacities, is typical in western Oregon*." With the neighborhood effort to save the structure and the property owner's willingness to have it continue to serve the community as a center for the neighborhood, the Board finds that the structure is an important and critical element to the continuity of the neighborhood or community. The Board assigns a score of 7 points.

3. *Historical Significance*

a. *It is associated with the life or activities of a person, group, organization, or institution that has made a significant contribution to the community, state, or nation. (up to 10 points)*

The original designation of the structure as a local historic landmark did not include information on the builder or an association with the life or activities of a group that

has made a significant contribution to the community. In this application, the applicant highlights how one of the builders was a descendant of a prominent family that established the first post office for the community that became known as Carus. S Mueller Rd is named after the wife of that builder and her family. Those associations illustrate how the structure is associated with a group (family) that has had a significant impact on the Carus community. Based on that, the Board assigns a score of 7 points.

*b. It is associated with an event that has made a significant contribution to the community, state, or nation. (up to 10 points)*

Testimony from the community in File No. Z0523-22, when the structure was going to be removed from the previous property, included many members of the community identifying how the structure made a significant contribution to their life and the community. The grassroots effort to save the structure solidifies how important the structure is to the community. Therefore, although there was not one specific event that made the structure significant to the whole community, the many community events held in the building contributed to the community significantly, and the Board assigns a score of 7 points.

*c. It is associated with, and illustrative of, broad patterns of cultural, social, political, economic, or industrial history in the community, state, or nation. (up to 10 points)*

The history of the structure is illustrative of the broad patterns of the cultural, social, political, and economic history of the Carus community. The original log schoolhouse being replaced in a new location by a craftsman style structure built with locally cut and milled timber was the first reflection the building had of the broad patterns of cultural change in the area. The second was the removal of the structure from the previous property in 2023 to improve a hazardous traffic situation that occurred during drop-off and pick-up. The last way in which the structure is illustrative of the broad patterns of the cultural and social fabric of Carus is the effort that led the community to relocate the structure and support it in becoming a community center, with a strong foundation to support its maintenance and continued public use. The Board assigns 8 points for this criterion.

*d. It possesses the potential for providing information of a prehistoric or historic nature. (up to 10 points)*

The structure does not have the ability to provide information of a prehistoric nature. However, as the community continues to support and use the structure, it does have the potential to provide information on the history of Carus to those who use it. The Board assigns a score of 5 points.

The total score of the Architectural, Environmental, and Historical Significance of the Carus Schoolhouse is over 40 points. This is sufficient to designate the area on

which the structure sits as a local historic landmark, as requested by the applicant. **These criteria are met.**

*C. Historic District:*

*D. Historic Corridor:*

*E. Contributing Resource:*

**Finding:** The application is not for a historic district, a historic corridor, or an alteration of a contributing resource on an existing landmark. **These criteria are not applicable.**

**707.03 Barlow Road Historic Corridor**

**Finding:** The subject property is not within the Barlow Road Historic Corridor. **These criteria are not applicable.**

**707.04 Uses Permitted**

*A. Primary Uses: A Historic Landmark or properties within a Historic District or Historic Corridor may be used for any use which is allowed in the underlying zoning district, including home occupations, provided such use is not detrimental to the preservation of the historic resource, subject to the specific requirements for the use, and all other requirements of Section 707.*

**Finding:** The application is for the placement of an HL overlay zone on the property. No uses other than those allowed in the EFU zone are proposed with the application. **These criteria are not applicable.**

**707.05 Historic Review Board**

*A Historic Review Board shall be established pursuant to Subsection 1307.03 and shall have the following responsibilities:*

* * * * *

*D. Review and make recommendations on all applications referred by the Board of County Commissioners, Hearings Officer, Planning Commission, or Design Review Committee;*

*E. Review and make recommendations on all applications for zoning of a Historic Landmark, a Historic District, or a Historic Corridor, subject to Subsections 707.02 and 707.06;*

**Finding:** The standards for designation as a historic landmark were analyzed by the Historic Review Board. The Historic Review Board made a recommendation of approval to the Board based on their review and discussion. **These criteria are met.**

**707.06 The Review Process**

*Subsection 707.06 applies to all Historic Landmarks, properties within Historic Districts and Historic Corridors, and contributing resources therein.*

*A. Designation and Zoning: Comprehensive Plan designation and zoning of a Historic Landmark, Historic District, or Historic Corridor shall be subject to the procedures identified in Section 1307 for Comprehensive Plan amendments and zone changes, respectively. In addition:*

*1. The Historic Review Board shall evaluate proposed designation and zoning of a Historic Landmark, Historic District, or Historic Corridor and shall make a recommendation to the Board of County Commissioners.*

*2. Pending Permits: No building permit for altering or moving any proposed Historic Landmark or any building within an area proposed for designation as a Historic Landmark, Historic District, or Historic Corridor, shall be issued while any advertised public hearing or any appeal affecting the proposed designation of the area or building is pending. In addition, demolition of a building affected by a pending public hearing or appeal under Subsection 707.06(A) shall be a violation of this Ordinance.*

**Finding:** The Historic Review Board evaluated the application and discussed the proposal during its meeting on October 8, 2026. At the end of its discussion, it made a recommendation to the Board, which considered the application during a land use hearing on October 27, 2026. No building permits have been issued to alter or move the Carus Schoolhouse during this land use review process. **These criteria are met.**

*B. Application Requirements: In addition to the submittal requirements identified in Subsection 1307.07(C), applications for alteration and development shall include:*

*1. A written description of the boundaries of the proposed Historic District, if applicable, or the location of the site;*

*2. A map illustrating the boundaries of the proposed Historic District, if applicable, or the location of the site;*

*3. A list of exterior materials pertinent to the application request;*

*4. Drawings of elevations of affected structure(s):*

*a. Drawings shall indicate dimensions and be to scale.*

*b. Photographs may be used in lieu of drawings for small projects.*

*5. Floor plans of affected structure(s); and*

*6. Site plan showing relationship of structure(s) to roadways, parking areas, access drives, landscape features, plant materials, fences, and other pertinent elements, drawn to scale.*

**Finding:** The applicant provided a complete application. The proposal includes no alteration or development of new structures. **These criteria are met.**

## B. ZDO 1202: Zone Changes

### 1202.01 Purpose and Applicability

*Section 1202 is adopted to provide standards, criteria, and procedures under which a change to the zoning maps (hereinafter referred to as a zone change) may be approved.*

**Finding:** The application is to add the HL overlay zone to the property. As proposed, this would change the zoning maps by adding the overlay. Thus, ZDO Section 1202 applies.

### 1202.02 Submittal Requirements

*In addition to the submittal requirements identified in Subsection 1307.07(C), an application for a zone change shall include a site plan of the subject property showing existing improvements, and a vicinity map showing the relationship of the subject property to the surrounding area.*

**Finding:** The applicant provided a site plan, narrative, and information that meets the criteria for the application submittal. **This criterion is met.**

### 1202.03 General Approval Criteria

*A zone change requires review as a Type III or IV application pursuant to Section1307, Procedures, and shall be subject to the following standards and criteria:*

*A. The proposed zone change is consistent with the applicable goals and policies of the Comprehensive Plan.*

**Finding:** The applicant found that the designation of the Carus Schoolhouse as a local historic landmark with the application of the HL overlay zone would be

consistent with the goals and policies of the Comprehensive Plan, with specific findings for Policies 9.C.5, 9.C.6, 9.C.7, and 9.C.8. The Board agrees with the applicant's findings that the designation of the Carus Schoolhouse will support the non-profit organization that formed to restore and support the structure as it applies for grants and pursues sources of funding to improve the foundation and electrical work of the structure, which is consistent with Comprehensive Plan Policy 9.C.7. As the applicant notes, the Carus Schoolhouse received land use approval through File No. Z0275-25 to become a community center, so the property owner and the non-profit organization are working to ensure the adaptive reuse of historic properties, which is consistent with the Comprehensive Plan Policy 9.C.8. In addition, based on the evaluation of the criteria above, the Carus Schoolhouse is determined to be significant, and the application therefore supports Comprehensive Plan Policy 9.C.4. **These criteria are met.**

*B. If development under the proposed zoning district designation has a need for any of the following public services, the need can be accommodated with the implementation of the applicable service provider's existing capital improvement plan: sanitary sewer, surface water management, and water. The cumulative impact of the proposed zone change and development of other properties under zoning designations shall be considered.*

**Finding:** No public services are proposed or needed with the placement of an HL overlay zone on the property. The structure currently exists on the property, and the property owner previously obtained a building permit to use the structure as an agricultural storage building. Following the placement of the structure on the property, the applicant applied to change the use of the structure to a community center through File No. Z0275-25, which was approved without the need to connect the structure to public services. Therefore, the needs of the Carus Schoolhouse can be met using the existing well and by complying with the requirements of DEQ for onsite wastewater treatment. The placement of the HL overlay zone does not change the use of the property or the use of the structure. **This criterion is met.**

*C. The transportation system is adequate and will remain adequate with approval of the proposed zone change. For the purpose of this criterion:*

*1. Adequate means a maximum volume-to-capacity ratio (v/c), or a minimum level of service (LOS), as established by Comprehensive Plan Tables 5-2a,Motor Vehicle Capacity Evaluation Standards for the Urban Area, and 5-2b,Motor Vehicle Capacity Evaluation Standards for the Rural Area.*

*2. The evaluation of transportation system adequacy shall be conducted pursuant to the Transportation Planning Rule (Oregon Administrative Rules 660-012-0060).*

3. *It shall be assumed that the subject property is developed with the primary use, allowed in the proposed zoning district, with the highest motor vehicle trip generation rate.*

4. *The methods of calculating v/c and LOS are established by the Clackamas County Roadway Standards.*

5. *The adequacy standards shall apply to all roadways and intersections within the impact area of the proposed zone change. The impact area shall be identified pursuant to the Clackamas County Roadway Standards.*

6. *A determination regarding whether submittal of a transportation impact study is required shall be made based on the Clackamas County Roadway Standards, which also establish the minimum standards to which a transportation impact study shall adhere.*

7. *Notwithstanding Subsections 1202.03(C)(4) through (6), motor vehicle capacity calculation methodology, impact area identification, and transportation impact study requirements are established by the ODO Transportation Analysis Procedures Manual for roadways and intersections under the jurisdiction of the State of Oregon.*

D. *Safety of the transportation system is adequate to serve the level of development anticipated by the proposed zone change.*

**Finding:** The placement of the HL overlay zone does not change the use of the property. Therefore, as the applicant notes, the transportation system is adequate for the HL overlay zone designation. **This criterion is met.**