

# MACKENZIE.

## **SITE PLAN REVIEW**

**To**  
City of Stayton

**For**  
Santiam Industrial Center  
Stayton, Oregon

**Dated**  
March 12, 2024

**Project Number**  
2220389.05



MACKENZIE  
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**ATTACHMENTS**

1. Application Form
2. Tax Maps with Site Marked
3. Aerial Photo
4. Survey, dated May 17, 2023
5. Plan Set
6. FEMA FIRMette
7. Preliminary Stormwater Report
8. Transportation Analysis Letter

## I. PROJECT SUMMARY

<b>Applicant:</b>	Stayton Washington, LLC, Att: Coby Holley 4020 Kinross Lakes Parkway Richfield, OH 44286 (503) 939-1450 cholley@irgra.com
<b>Owner:</b>	Stayton Washington, LLC 4020 Kinross Lakes Parkway Richfield, OH 44286
<b>Tax Lot ID:</b>	Marion County tax lot 091W10CB02400
<b>Site Address:</b>	930 W Washington Street
<b>Site Area:</b>	39.24 acres
<b>Base Zone:</b>	Light Industrial (IL)
<b>Overlay Zone:</b>	Natural Resource Overlay District (50' from the normal high-water line of Salem Ditch)
<b>Comprehensive Plan:</b>	Industrial (I)
<b>Adjacent Zoning:</b>	North (across Washington Street): Industrial (IL), High Density Residential (HD), Commercial General (CG) South: Industrial (IL), Medium Density Residential (MD), Low Density Residential (LD) East: Low Density Residential (LD), Medium Density Residential (MD) (across Evergreen Ave) West: Industrial (IL), Low Density Residential (LD)
<b>Existing Structures:</b>	Three (3) buildings (two (2) warehouses and one (1) guard shack) exist on the site. <sup>1</sup>
<b>Request:</b>	Site Plan Review
<b>Project Contact:</b>	Mackenzie Attn: Brian Varricchione (971) 346-3742 bvarricchione@mcknze.com

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<sup>1</sup> The site previously had a machine shop (visible in aerial photography), which has been demolished as part of the proposed site reconfiguration.

## **II. INTRODUCTION**

### **Description of Request**

The applicant requests Site Plan Review approval for improvements to the Santiam Industrial Center on W Washington Street.

### **Site and Surrounding Land Use**

The property is located at 930 W Washington Street, between N Larch Avenue and N Evergreen Avenue, and is identified as a portion of Marion County tax lot 091W10CB02400. The property is zoned (IL) Light Industrial.

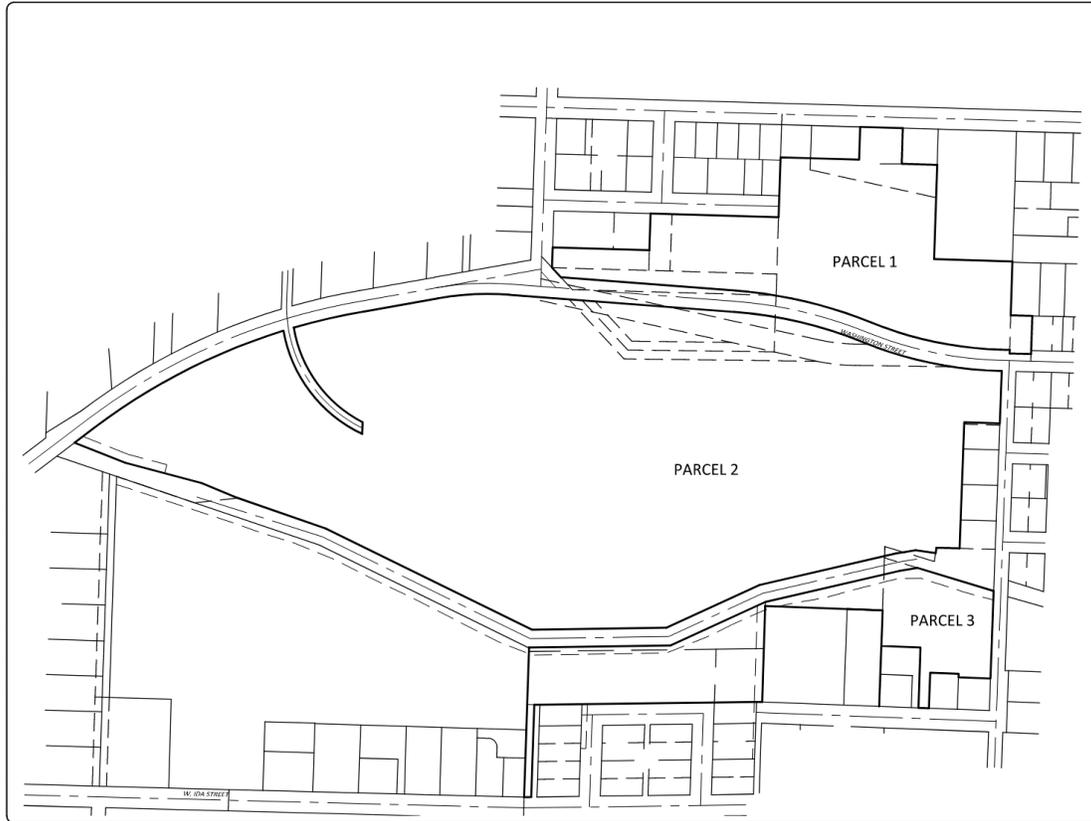
The subject site is a developed industrial site with three (3) buildings (two (2) warehouses and one (1) guard shack), parking, loading, trailer storage, and other facilities. Existing building area comprises 525,434 SF (plus an additional 12,545 SF of canopy area over loading docks). An approximately 9,441 SF machine shop has recently been demolished. An aerial photograph of the site is included as Figure 1 and Exhibit 3. The subject site has frontage on Washington Street to the north and is bound by Salem Ditch along the southern boundary. The Natural Resources Overlay boundary extends fifty feet into the site from the normal high-water line of Salem Ditch. Existing security fencing is located along the site's Washington Street frontage.

Surrounding land uses are light industrial to the north, south, and west; general commercial to the north; and low- medium- and high-density residential in all directions, including four (4) dwellings directly adjacent to the site along N Evergreen Avenue.



**Figure 1: Aerial Photo**

A separate partition application (Land Use File #PAR 4-05/23) has been approved by the City; the present application is limited to proposed Parcel 2 (Subject Site). See Figure 2. Conditions of approval for this partition required separation of utilities, as well as removal of fencing and off-street parking from the W Washington Street right-of-way. These items are being handled separately from this application.



**Figure 2: Stayton Preliminary Partition Plat (Excerpt from Land Use File #PAR 4-05/23)**  
Not to Scale

### Description of Proposed Development

There are currently three (3) main buildings (two (2) warehouses and one (1) guard shack) which total approximately 525,434 SF (plus an additional 12,545 SF of canopy area over loading docks). The intent of the project is to refresh and repair the existing buildings. The improvements would update the building and systems to accommodate multiple industrial tenants, address deferred maintenance, improve the property's function, and reactivate this important site as an economic driver for the community. Anticipated improvements include the following:

- Demolition of an approximately 9,441 SF machine shop (this has already been completed).
- Construction of individual tenant entrances with associated parking spaces.
- Construction of exterior dock doors with supporting concrete aprons.
- Addition of canopy covers (open on three sides) over loading docks, approximately 7,497 SF.
- Construction of trailer/yard spaces.
- Restriping of existing parking north of the buildings to ensure parking spaces are not within the W Washington Street right-of-way.
- Addition of parking and associated landscaping.
- Addition of a stormwater management facility.
- Signage, which will be addressed with future sign permit applications.

Separately from this application, the buildings are also being repainted to improve their appearance.

Increased building area is limited to approximately 7,497 SF of additional canopies over loading docks; no new enclosed building area is proposed. Demolition of the existing 9,441 SF machine shop structure results in a net decrease of approximately 1,944 SF. Existing buildings will be reconfigured to accommodate multiple tenants, which may include a range of manufacturing, construction, transportation and warehousing, wholesale trade, and accessory uses as allowed in the IL Zone; however, warehousing is anticipated to remain as the predominant use.

No changes to driveway access locations are proposed.

No activities are proposed within the Natural Resource Overlay District.

### III. NARRATIVE AND COMPLIANCE

The following narrative addresses how the proposal complies with all applicable City of Stayton Land Use and Development Code criteria. In the sections below, applicable approval standards from the code are shown in *italics*, while responses are shown in a standard typeface.

#### CHAPTER 17.12 APPROVAL PROCEDURES

##### 17.12.070 Decision Authority

1. *AUTHORITY. The decision authority on applications shall be as follows:*
  - a. *Staff Decisions. City staff shall be required and empowered to review, evaluate and render decisions on the following land use applications:*
    - 1) *Site Plan Review*
      - a) *Development on a previously vacant lot for which the area of development is 5,000 square feet or less.*
      - b) *Expansions, additions or other modifications to a previously developed lot that would increase the floor area of the structure by less than 15% or increase the number of parking spaces needed by less than 15%.*
    - 2) *Final subdivision and partition plats.*
    - 3) *Minor modifications*

**Response:** The site is currently developed with three (3) buildings. As described in the introduction to this report, the proposed new building area is limited to approximately 7,497 SF, which consists of additional canopy area over loading docks; no new enclosed building area is proposed. Demolition of the existing 9,441 SF machine shop structure results in a net decrease of approximately 1,944 SF, or 0.4%, of the total 545,476 SF building area. The existing number of off-street parking spaces is 181 located on the subject site, plus 366 on the north side of W Washington Street, for a total of 547 spaces. The proposal would provide a total of 268 parking spaces, retaining 150 of the existing on-site spaces, adding 118 new spaces on site, and subtracting the existing 366 spaces on the north side of W Washington Street (this area is now a separate parcel; see Land Use File #PAR 4-05/23). No final subdivision plat, final partition plat, or minor modification is proposed as part of this application. As the proposed scope does not exceed the thresholds of SMC 17.12.070.1.a, this Site Plan Review application is subject to staff review and decision.

2. *STANDARDS. It is the responsibility of the applicant to provide evidence that allows the decision authority to make findings that the application is in conformance with applicable standards of the Comprehensive Plan, this title, and other state and local law; and that the specific approval criteria for the application, as contained within applicable sections of this code, have been satisfied.*

**Response:** The applicant has provided this narrative explaining compliance with applicable sections of Stayton Municipal Code, Title 17, along with supporting exhibits. This standard is met.

##### 17.12.160 Pre-Application Meeting

2. *WHEN REQUIRED. A minimum of 1 pre-application meeting must be held prior to submittal of an application:*

**Response:** A pre-application Meeting was held on September 19, 2023. This standard is met.

##### 17.12.220 Site Plan Review

2. *METHOD OF ADOPTION.*

- a. *Site plans shall be adopted pursuant to the requirements of Sections 17.12.070 through 17.12.100. The decision shall be made in accordance with this Title.*

**Response:** This provision contains procedural guidance and requires no evidence submittal from the applicant.

3. **REQUIREMENTS FOR SITE PLAN REVIEW.** *Site plan review approval is required when:*

- a. *A site plan review overlay district is imposed by the City Council as a condition of rezoning the parent or principal zone of a given property or properties.*

**Response:** The subject site is not located in a site plan review overlay district. This standard is not applicable.

- b. *Made a condition of approval of a conditional use.*

**Response:** The requirement for Site Plan Review is not a condition of approval from a conditional use application/approval. This standard is not applicable.

- c. *Otherwise required by specific provisions of this Title.*

**Response:** Per Table 17.16.070.1, a range of manufacturing, construction, transportation and warehousing, wholesale trade, and accessory uses are listed as Permitted after Site Plan Review for new construction or expansion of an existing structure in the IL zone. While the proposed scope of work does not involve expansion of any existing structures, Staff informed the applicant during the pre-application conference that Site Plan Review will be required to accommodate the proposal.

- e. *Improvements to existing development causing more than a 15% increase in traffic or parking needs.*

**Response:** There is no increase in floor area or change of use proposed as part of this application; therefore, there is no change in the anticipated traffic or parking needs. See further discussion of trip generation in Exhibit 8. This standard is not applicable.

- f. *Improvements exceeding 15% of existing development by area, not including the area of internal roadways, parking and loading areas, and landscaping.*

**Response:** The proposed site improvements include parking and loading areas, and landscaping, which are not included in this threshold. The existing building area is 525,434 SF, plus 12,545 SF of loading bay canopies, for a total of 537,979 SF. The proposal includes an additional 7,497 SF of loading bay canopy area, as well as demolition of an existing 9,441 SF machine shop which is a net decrease of 1,944 SF or 0.4% of the total building area. Therefore, the proposed improvements do not exceed 15% of existing development by area. This standard is not applicable.

4. **SUBMITTAL REQUIREMENTS.** *In order to be accepted as complete and processed in a timely manner by the City, requests for approval of site reviews shall include the following materials and information:*

- a. *Completed application forms as supplied by the City Planner.*

**Response:** A completed application form is included as Exhibit 1. This standard is met.

- b. *A site plan, drawn to a scale of 1 inch equals not more than 50 feet, showing the property for which the site plan review is requested. The site plan shall show, or be accompanied by, the following:*

- 1) *The name of the person who prepared the plan.*

**Response:** The name of the person who prepared the plan is included in Exhibit 5, Sheet G0.02. This standard is met.

2) *A north point, graphic scale, and date of the proposed site plan.*

**Response:** The north point, graphic scale, and date of the proposed site plan is included in Exhibit 5.

3) *Topography of the site with contour intervals of not more than 2 feet.*

**Response:** Existing site topography with 1-foot contour intervals is depicted in Exhibit 5, Sheet C1.00, while proposed contours are shown on Sheet C1.20. This standard is met.

4) *The names and addresses of the landowners, applicant, and the engineer, surveyor, land planner, landscape architect, or any other person responsible for designing the proposed site plan.*

**Response:** This information is included in Exhibit 5, Sheet G0.02. This standard is met.

5) *The tax map number (township, range and section) and lot number of all properties included in the proposed site plan.*

**Response:** This information is included in Exhibits 2, 3, and 5 (Sheet G0.02). This standard is met.

6) *The boundary lines of the properties as certified by a professional land surveyor and approximate area of the properties in acres or square feet.*

**Response:** This information is included in Exhibit 4 and Exhibit 5, Sheet C1.10. This standard is met.

7) *The location, widths, and names of existing or platted streets or other public ways (including easements) within or adjacent to the tract, existing permanent buildings and any addresses for the buildings.*

**Response:** This information is included in Exhibit 4 and Exhibit 5, Sheet C1.10. This standard is met.

8) *The location of existing sewage systems, storm water systems and water mains, culverts, drainage ways, or other underground utilities or structures within, or immediately adjacent to the property.*

**Response:** A utility plan is included in Exhibit 5, Sheet C1.30. This standard is met.

9) *A preliminary storm water management plan for the development, prepared in accordance with the Public Works Design Standards.*

**Response:** A preliminary stormwater report is included as Exhibit 7.

10) *The locations of proposed sewer disposal and water supply systems in accordance with the City's Wastewater and Water Master Plans.*

**Response:** A utility plan is included in Exhibit 5, Sheet C1.30. This standard is met.

11) *The locations of any prominent natural features such as: water courses (including direction of their flow), wetlands, rock outcroppings, and areas subject to flooding or other natural hazards.*

**Response:** The location of the Salem Ditch is included in Exhibit 5, Sheet C1.10. This standard is met.

12) *A landscaping plan prepared in accordance with Section 17.20.090.3*

**Response:** A landscaping plan is included in Exhibit 5, Sheets L0.01 – L1.14.

13) *The location of parking facilities for the site including any parking areas shared with adjacent uses by reciprocal access agreement.*

**Response:** The location of existing and proposed parking facilities are shown in Exhibit 5. This standard is met.

14) *A Traffic Impact Analysis (TIA) or Transportation Assessment Letter as required by Section 17.26.050.*

**Response:** A Transportation Assessment Letter is attached as Exhibit 8. This standard is met.

15) *The location of any proposed structures including the ground coverage, floor area and proposed use. Building elevations drawings shall be submitted to the extent necessary to show compliance with the requirements of Sections 17.20.190, 17.20.200, 17.20.220, and 17.20.230.*

**Response:** No new structures are proposed. The existing building locations, including ground coverage and floor area is included in Exhibit 5. The buildings' use will remain industrial. Building elevations are included on Sheets A2.10 – A2.13. This standard is met.

16) *The location and dimensions of open storage areas or outdoor storage yards.*

**Response:** The location of the outdoor storage is included in Exhibit 5, Sheet C1.10. This standard is met.

17) *The size location, direction and intensity of illumination of all signs and a lighting plan that includes.*

- a) *The location of all existing and proposed exterior lighting fixtures.*
- b) *Specifications for all proposed lighting fixtures including photometric data, color rendering index of all lamps, and other descriptive information of the fixtures.*
- c) *Proposed mounting height of all exterior lighting fixtures*
- d) *Analyses and illuminance level diagrams showing that the proposed installation conforms to the light level standards of Section 17.20.170.*
- e) *Drawings of all relevant building elevations showing the fixtures, the portions of the walls to be illuminated, the illuminance levels of the walls, and the aiming points for any remote light fixtures.*

**Response:** A photometric including specifications, mounting height, and illuminance levels is included as Exhibit 5, Sheet C1.50. Building elevations, including wall-mounted outdoor light fixtures, can be found in Exhibit 5, Sheets A2.11 through A2.14.

18) *The location of any free standing signage and the proposed size(s) and dimension(s).*

**Response:** No free-standing signage is included as part of this application. This standard is not applicable.

19) *The location of any proposed screening including fences, walls, hedges and berms.*

**Response:** The location of existing fencing is shown in Exhibit 5, Sheets C1.00 and C1.10. Some fencing along W Washington Street will be relocated out of the right-of-way, separately from this application, as a condition of the previous partition approval. No new screening is proposed. This standard is met.

20) *When any development activity is proposed on a location a slope of 20% or steeper, a geotechnical study, prepared by a licensed geologist or registered engineer with experience in geotechnics, determining the suitability of the site for construction considering the possibility of increased erosion potential, slope stability, slippage and other concerns.*

**Response:** No development activity is proposed on areas with a slope of 20% or steeper. This standard is not applicable.

c. *A narrative statement fully explaining the request and fully addressing the criteria for approval of site plan review.*

**Response:** This burden of proof narrative explains compliance with applicable Sections of Stayton Municipal Code, Chapter 17. This standard is met.

5. **APPROVAL CRITERIA.** *The following criteria must be demonstrated as being satisfied by the application:*

a. *The existence of, or ability to obtain, adequate utility systems (including water, sewer, surface water drainage, power, and communications) and connections, including easements, to properly serve development in accordance with the City's Master Plans and Public Works Design Standards. Where an adopted Master Plan calls for facilities larger than necessary for service to the proposed use, the developer shall install the size facilities called for in the Master Plan, and shall be provided credit for the excess costs in accordance with SMC 13.12.245.*

**Response:** As shown on Sheet C1.00 of Exhibit 5, existing utilities provided to the site are water, sewer, storm water drainage, power, gas, and communication; these utilities are adequate to continue serving the subject site for a range of industrial uses. No upgrades are proposed as part of this application. This standard is met.

b. *Provisions have been made for safe and efficient internal traffic circulation, including both pedestrian and motor vehicle traffic, and for safe access to the property for vehicles, as well as bicycle and pedestrians, from those public streets which serve the property in accordance with the City's Transportation System Plan and Public Works Design Standards.*

**Response:** The subject site is a developed industrial site which has historically been used as a cannery facility operated by NORPAC, which required efficient internal traffic circulation for passenger vehicles, heavy trucks, and employees. The current proposal would continue industrial use of the property, retaining the majority of existing on-site parking, adding new parking areas and loading bays, and retaining internal traffic circulation. No changes are proposed to the existing access points along W Washington Street. While these access points are non-conforming, they contribute to the safety and efficiency of traffic circulation by separating truck traffic from passenger vehicles. This standard is met.

c. *Provision has been made for all necessary improvements to local streets and roads, including the dedication of additional right-of-way to the City and/or the actual improvement of traffic facilities to accommodate the additional traffic load generated by the proposed development of the site in accordance with Chapter 17.26, the City's Transportation System Plan, and Public Works Design Standards. Improvements required as a condition of approval shall be roughly proportional to the impact of the development on transportation facilities. Approval findings shall indicate how the required improvements are directly related to and are roughly proportional to the impact of development.*

**Response:** This proposal continues the light industrial use of the subject site and does not result in increased trip generation (see Transportation Analysis Letter, Exhibit 8). Therefore, the impact of the development on transportation is negligible (i.e. right-of-way dedications or street improvements would not be proportional to the impact). See further discussion in the responses to Chapters 17.20 and 17.26. This standard is met.

*d. Provision has been made for parking and loading facilities as required by Section 17.20.060.*

**Response:** Existing and proposed parking and loading facilities are shown on Sheets C1.00 and C1.10 of Exhibit 5. Section 17.20.060 is addressed later in this report, demonstrating all applicable standards are satisfied by the proposal. This standard is met.

*e. Open storage areas or outdoor storage yards shall meet the standards of Section 17.20.070.*

**Response:** Outdoor storage yards are shown on Sheet C1.10, Exhibit 5. Section 17.20.070 is addressed later in this report, demonstrating all applicable standards are satisfied by the proposal. This standard is met.

*f. Site design shall minimize off site impacts of noise, odors, fumes or impacts.*

**Response:** Use of the already-developed subject site will continue to be industrial. Off-site impacts are anticipated to be minimal compared with the historical use of the site as a packaging facility for NORPAC. Proposed physical changes to the site are limited, including new parking, loading, landscaping, and trailer/yard areas. These changes will not increase off-site impacts compared to historical usage. This standard is met.

*g. The proposed improvements shall meet all applicable criteria of either Section 17.20.190 Multi-family Residential Design Standards, Section 17.20.200 Commercial Design Standards, Section 17.20.220 Downtown Development Design Standards, or Section 17.20.230 Industrial Design Standards.*

**Response:** The subject site and use are industrial; therefore, Section 17.20.230 applies and is addressed later in this report, finding the proposal conforms to all applicable requirements. This standard is met.

*j. Landscaping of the site shall prevent unnecessary destruction of major vegetation, preserve unique or unusual natural or historic features, provide for vegetative ground cover and dust control, present an attractive interface with adjacent land uses and be consistent with the requirements for landscaping and screening in Section 17.20.090.*

**Response:** The proposed landscaping plans can be found on Sheets L0.01 through L5.11 of Exhibit 5. No destruction of major vegetation is proposed, and no unusual natural or historic features exist on the site. Areas used for parking, loading, vehicle circulation, and trailer/yard space will be paved or rocked, minimizing dust. Section 17.20.090 is addressed later in this report, finding the proposal conforms to all applicable requirements. This standard is met.

*k. The design of any visual, sound, or physical barriers around the property such as fences, walls, vegetative screening, or hedges, shall allow them to perform their intended function and comply with the requirements in Sections 17.20.050 and 17.20.090.*

**Response:** No new visual, sound, or physical barriers are included as part of this application. This standard does not apply.

*l. The lighting plan satisfies the requirements of Section 17.20.170.*

**Response:** The proposed lighting plan can be found on Sheet C1.50 of Exhibit 5 and satisfies the requirements of Section 17.20.170, which are addressed later in this report. This standard is met.

*m. The applicant has established continuing provisions for maintenance and upkeep of all improvements and facilities.*

**Response:** The applicant acknowledges its ongoing responsibility to maintain site features including buildings, vehicular areas, and landscaping. The proposed improvements are intended to address deferred maintenance at the facility following NORPAC's bankruptcy. This standard is met.

*n. When any portion of an application is within 100 feet of North Santiam River or Mill Creek or within 25 feet of Salem Ditch, the proposed project will not have adverse impact on fish habitat.*

**Response:** Salem Ditch runs along the southern boundary of the site. The Natural Resources Overlay (NRO) boundary extends fifty feet from the normal high-water line of the ditch and is depicted on the proposed site plan, Sheet C1.10 of Exhibit 5. As demonstrated by the site plan, no activities are proposed within the NRO. Additionally, standards for the NRO are addressed later in this report, Section 17.16.090, finding all applicable requirements are satisfied. Considering the proposal's compliance with the NRO, the proposed project will not have adverse impact on fish habitat. This standard is met.

*o. Notwithstanding the above requirements the decision authority may approve a site plan for a property on the National Register of Historic Places that does not meet all of the development and improvement standards of Chapter 17.20 and the access spacing standards of Chapter 17.26 provided the decision authority finds that improvements proposed are in conformance with Secretary of the Interior's Standards for Treatment of Historic Properties, the site will provide safe ingress and egress to the public street system, and that adequate stormwater management will be provided.*

**Response:** The subject property is not listed on the National Register of Historic Places. This standard does not apply.

## 6. IMPOSITION OF RESTRICTIONS AND CONDITIONS.

*a. The decision authority may prescribe restrictions or limitations for the proposed site plan review approval as it deems necessary to fulfill the purpose and intent of the code. Such restrictions or limitations shall be based on evidence and analysis presented to or generated by the decision authority during the course of its evaluation of the request, and shall be made a part of the approval action. Conditions may limit the time or duration of the use.*

**Response:** This application narrative and supporting documentation demonstrate the proposal satisfies the applicable review criteria and standards. The need for conditions of approval should be minimal.

*b. To ensure that required public improvements are made in a timely and acceptable manner, the applicant(s) may be required by the City to provide acceptable financial assurance to the City consistent with the requirements of Section 17.20.120.*

**Response:** No required public improvements are anticipated as a result of this proposal due to the limited scope associated with the project.

*c. A violation of any such condition(s) or limitation(s) shall constitute a violation of this Title.*

**Response:** As described above, the need for conditions of approval should be minimal; however, the applicant intends to comply with the final decision.

## **CHAPTER 17.16 ZONING**

### **17.16.030 General Requirements**

1. *MINIMUM REQUIREMENTS. In interpreting and applying this Chapter, the provisions shall be the minimum requirements adopted for the promotion of the public health, safety, comfort, convenience, and general welfare.*

**Response:** This application narrative and the supporting documentation demonstrate that the proposal meets or exceeds the applicable requirements of Chapter 17.16. This standard is met.

2. *MINIMUM STREET WIDTH. All street rights-of-way shall conform to requirements in Chapter 17.26.*

**Response:** Per the City of Stayton Transportation System Plan (TSP), W Washington Street is a City street and is classified as a minor arterial (see City of Stayton TSP, Figure 8). Per Table 5 of the City of Stayton TSP, the standard for minor arterials calls for a right-of-way width of 60 to 100 feet. The TSP classifies N Evergreen Avenue as a Residential Local street, for which the standard right-of-way width is 45 to 60 feet. Based on the tax maps (Exhibit 2), W Washington Street has an existing right-of-way width of 60 feet along the length of the site, while N Evergreen Avenue has a width of 40 feet. The width of W Washington Street satisfies the minimum standard, while the width of N Evergreen Avenue is below the minimum standard. As the proposed improvements will not generate a net increase in vehicle trips (Exhibit 8), there is no nexus to require dedication of additional right-of-way.

3. *LOTS ABUTTING A PARTIAL STREET*

- a. *No building permit shall be issued for a building or structure on a lot which abuts that side of a partially dedicated street that has not yet been dedicated or condemned.*
- b. *This provision shall not be construed as being in lieu of or waiving any subdivision or partitioning requirement of this or any other section of this title.*

**Response:** The subject site does not abut any partially dedicated street. This standard is not applicable.

4. *STREET DEDICATIONS AND PUBLIC IMPROVEMENTS. Street dedications and public improvements are to be installed in accordance with the provisions of Chapters 12.04 and 12.08.*

**Response:** No street dedications or public improvements are proposed as part of this project. This standard is not applicable.

5. *BUILDINGS TO BE ACCESSIBLE TO PUBLIC STREET. Every dwelling (or other building) shall be situated on a lot having direct access by abutting upon:*

- a. *A public street*

**Response:** The subject site has direct access to W Washington Street, which is a public street. This standard is met.

- b. *City-approved easement in accordance with 17.26.020.4.f. An easement shall not serve more than 4 dwelling units.*

**Response:** The site does not contain easements which provide access to dwellings. Section 17.26.020.4.f is not present in the code. This standard is not applicable.

**17.16.040 General Administrative**

**4. CHANGE OF USE**

a. *Permit Required. The change of use of a building, a portion of building, or a lot shall require a permit from the City Planner.*

**Response:** Use of the site will continue to be industrial. Additionally, as described in greater detail later in this report, a Transportation Assessment Letter (TAL) is included as Exhibit 8 and demonstrates the proposal will not increase trip generation; therefore, no change of use resulting in additional trips is proposed as part of this Site Plan Review application. This standard is not applicable.

**17.16.070 District Regulations**

1. *PERMITTED AND CONDITIONAL USES. The land uses permitted in each district are shown in Table 17.16.070.1. When a property is in an overlay zone, the stricter regulations of the two zones shall apply.*

*P = Permitted Use*

*C = Conditional Use*

*S = Permitted Use after Site Plan Review for new construction or expansion of an existing structure. See Section 17.16.040.4 for existing structures*

*C/S = Conditional Use after Site Plan Review*

*= Prohibited Use*

<b>TABLE 17.16.070.1 PERMITTED LAND USE (EXCERPT)</b>		
<b>Industrial Uses</b>		<i>IL</i>
<b>Manufacturing</b>		
76	<i>Food Manufacturing (except for animal slaughtering and processing and seafood preparation)</i>	<i>S</i>
77	<i>Beverage Manufacturing</i>	<i>S</i>
78	<i>Textile Mills and Textile Product Mills</i>	<i>C/S</i>
79	<i>Apparel &amp; Leather Manufacturing</i>	<i>S</i>
79a	<i>Wood Products Manufacturing</i>	<i>C/S</i>
80	<i>Paper Mills &amp; Paperboard Mills</i>	<i>S</i>
81	<i>Converted Paper Product Manufacturing</i>	<i>S</i>
82	<i>Printing &amp; Related Support Activities</i>	<i>S</i>
83	<i>Chemical, Plastics, Rubber Products, &amp; Nonmetallic Mineral Products Manufacturing</i>	<i>C/S</i>
84	<i>Primary Metal Manufacturing</i>	<i>C/S</i>
85	<i>Fabricated Metal Product Manufacturing</i>	<i>S</i>
86	<i>Machinery Manufacturing</i>	<i>S</i>
87	<i>Computer &amp; Electronic Product Manufacturing</i>	<i>S</i>
88	<i>Electrical Equipment, Appliance &amp; Component Manufacturing</i>	<i>S</i>
89	<i>Transportation Equipment Manufacturing</i>	<i>S</i>
90	<i>Furniture &amp; Related Product Manufacturing</i>	<i>S</i>
91	<i>Miscellaneous Manufacturing</i>	<i>S</i>
<b>Construction</b>		
92	<i>Building Construction Contractors</i>	<i>S</i>

93	Heavy & Civil Engineering Construction Contractors	S
94	Specialty Trade Contractors	S
<b>Transportation and Warehousing</b>		
95	Air Transportation (passenger or freight)	C/S <sup>9</sup>
96	Rail Transportation	S
97	Truck Transportation (general freight & specialized freight)	S
98	Transit & Ground Passenger Transportation	S
99	Motor Vehicle Towing	S
100	Postal Service	
101	Couriers & Messenger Service	
102	Warehousing & Storage (except self storage)	S
103	Automotive Wrecking Yard, Junkyard	C/S
104	Boat & RV Storage	
<b>Wholesale Trade</b>		
105	Merchant Wholesalers	
106	Wholesale Electronic Markets & Agents & Brokers	
107	Electric Power Generation Facilities	S
108	Electricity Transmission & Distribution Facilities	S
109	Natural Gas Distribution Facilities	S
110	Water or Sewage Treatment Plants	
<b>Accessory &amp; Other Uses</b>		
133	Open Storage Areas	P
134	Outdoor Storage Yard	P
Notes to Table 17.16.070.1		
<sup>9</sup> Heliport Only		

**Response:** The current and historical use of the building is industrial. Specifically, *Food Manufacturing and Warehousing & Storage (except self storage)*; the site was formerly operated as a cannery by NORPAC. Both use categories are Permitted Uses after Site Plan Review for new construction or expansion of an existing structure. Although no new structure or expansion of an existing structure is proposed because the applicant intends to reposition the building and site to be used by multiple speculative tenants, staff has advised that a Site Plan Review application is required. Potential uses of the site will continue to be industrial and may specifically include manufacturing, construction, transportation and warehousing, wholesale trade, and associated accessory uses in accordance with those allowed in the IL Zone, including but not limited to those listed above. This standard is met.

2. **DIMENSIONAL REQUIREMENTS FOR LOTS.**

- a. All lots shall comply with the minimum requirements of Table 17.16.070.2. Additional requirements may be imposed by other provisions of this Code. It is a violation of this Code to create a lot which does not meet the dimensional requirements of this section.

<b>TABLE 17.16.070.2 MINIMUM DIMENSIONAL REQUIREMENTS FOR LOTS (EXCERPT)</b>	
	<b>IL</b>
Lot Area (square feet) <sup>1</sup>	0
Lot Width (feet)	0
Average Width (feet)	0
Notes to Table 17.16.070.2	
<sup>1</sup> The decision authority may require larger lot areas at the time a partition or subdivision is approved if they determine that it is necessary to do any of the following:	

- a. Protect natural drainage ways.
- b. Provide drainage or utility easement.
- c. Protect the future right-of-way.
- d. Protect the unbuildable steep slope areas above 15 percent slope.
- e. Protect flood plain hazard or wetland areas.

**Response:** The subject site (Parcel 2, located south of Washington Street) measures approximately 33 acres as shown on Sheet C1.10 of Exhibit 5. The lot width is approximately 2,400 feet (variable). There are no minimum lot dimensions in the IL zone. This standard is met.

3. **DIMENSIONAL REQUIREMENTS FOR STRUCTURES.**

- a. All structures shall comply with the requirements of Table 17.16.070.3. Setback requirements are minimum requirements. Building height is a maximum requirement. Additional requirements may be imposed by other provisions of this Code.

<b>TABLE 17.16.070.3 DIMENSIONAL REQUIREMENTS FOR STRUCTURES (EXCERPT)</b>	
	<b>IL</b>
Front Yard Setback (feet) <sup>1</sup>	0
Side Yard Setback (feet)	0 <sup>3</sup>
Rear Yard Setback (feet)	0 <sup>3</sup>
Building Height (feet) <sup>5</sup>	60 <sup>7</sup>

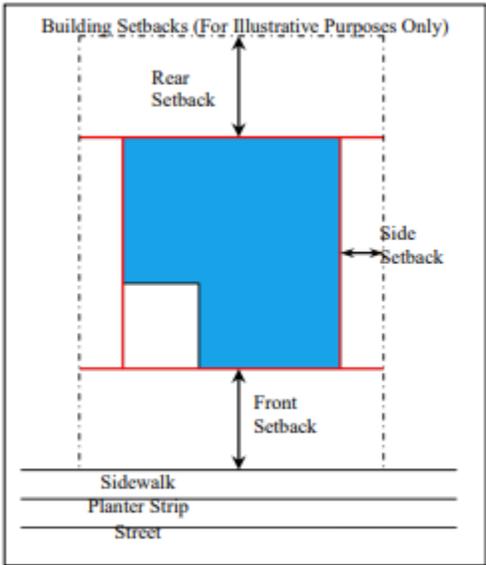
*Notes to Table 17.16.070.3*

<sup>1</sup>Front setbacks are also subject to the requirements of Section 17.20.080

<sup>3</sup> 10 feet when adjacent to a residential district, or as may be established through a site plan review.

<sup>5</sup> Chimneys and antennas may exceed this limit. The maximum height of antennas shall be 55 feet, unless conditional use approval is obtained.

<sup>7</sup> Chimneys and antennas may exceed this limit. The maximum height of antennas shall be 15 feet above the highest point of the principal structure existing on the structure unless conditional use approval is obtained.



Building

**Response:** The proposed development will not change the existing building setbacks. As shown on Sheets C1.10 and A2.11 through A2.14 of Exhibit 5, the buildings have the following minimum setbacks and maximum heights:

EXISTING SETBACKS AND BUILDING HEIGHT			
	Building A	Building B	Guard Shack
Front Yard Setback (feet)	40'	113'	406'
Side Yard Setback (feet)	300'	8'	233'
Rear Yard Setback (feet)	210'	2'	138'
Maximum Building Height (feet)	±44'	±40'	±15'

As the yard setbacks and building height comply with Table 17.16.070.3 and the existing buildings are shorter than 60' in height, this standard is met.

5) *BUILDING ORIENTATION. If the lot has frontage on a public street and is not a flag lot, the architectural front of the dwelling shall face the street.*

**Response:** The existing building is not a dwelling. No dwellings are proposed. This standard is not applicable.

**17.16.090 Natural Resource Overlay District**

1. *BOUNDARIES OF THE NR DISTRICT. The NR Overlay district shall include lands that are:*
  - a. *100 feet from the normal high water line of the North Santiam River, Mill Creek, Lucas Ditch, Salem Ditch north of Shaff Road, except for areas within the HD, CR, CG, CCMU, DRMU, and ID zones.*
  - b. *50 feet from the normal high water line of the Salem Ditch and the Stayton Ditch, except for areas within the CR, CG, CCMU, and DRMU zones.*

*The provisions, requirements, and restrictions found herein shall be in addition to those found in the underlying primary zone. Where there are conflicts between the requirements of the NR Overlay zone and the requirements of the underlying primary zone, the more restrictive requirements shall apply.*

**Response:** The Subject Site abuts Salem Ditch but is not north of Shaff Road and is not located in the CR, CG, CCMU, or DRMU zones. The boundary of the Natural Resource (NR) District is 50' from the normal high-water line of the Salem Ditch and is illustrated in Exhibit 5. This standard is applicable.

2. *PERMITTED USES. All uses are subject to site plan review.*
  - a. *Publicly owned buildings and facilities related to water supply and treatment, including parking and storage areas.*
  - b. *Recreational trails, walkways, and bikeways.*
  - c. *Public parks and river-related recreational facilities, including meeting rooms, viewing platforms, displays, signs, restrooms, and parking areas.*
  - d. *Resource enhancement projects.*
  - e. *Road and access drives.*
  - f. *Accessory uses.*

**Response:** The subject site contains existing paved surfaces within the NR Overlay district. These areas have historically been used for vehicular circulation, parking, and storage, which are accessory to the primary warehouse use of the property. The proposal would continue these accessory uses but would not add any new uses within the NR Overlay. An existing storm water outfall into Salem Ditch, considered an accessory use under Subsection 2.f., is proposed to remain within the NR Overlay. This standard is met.

3. *DEVELOPMENT CRITERIA. Proposals for development will be subject to the following criteria in addition to the site plan review criteria in Section 17.12.220.6.*

a. *The proposal shall have as few significant detrimental environmental impacts on water as possible.*

**Response:** The proposal would continue to operate accessory uses within the NR Overlay where the site is already developed and where those uses have historically occurred. No new development is proposed within the NR Overlay and no additional detrimental environmental impacts will result from the continued use of existing developed areas. This standard is met.

b. *All identified impacts are mitigated through implementation of a mitigation plan approved by the City.*

**Response:** No new impacts have been identified, so no mitigation plan is required. This standard is not applicable.

c. *Existing trees and other vegetation shall be retained to the greatest extent possible pursuant to Chapter 17.20.150.*

**Response:** No existing trees or vegetation are proposed to be removed within the NR Overlay as part of this application. This standard is met.

d. *The proposal shall balance the impacts on the area with the potential for public enjoyment of the riparian environment and recreational use of the protected water body.*

**Response:** No public access to the Salem Ditch riparian area on the subject site exists or is proposed. Continued use of the existing developed areas within the NR Overlay will not interfere with any ongoing public recreational use of the surface water of Salem Ditch. This standard is met.

4. *IMPACT EVALUATION. An impact evaluation may be required for proposals in the NR Overlay zone. The impact evaluation shall include:*

a. *Identification of all natural resources.*

b. *A storm water runoff report and plan detailing the quantity and quality of any storm water runoff from the construction or developed use of the property. The report shall detail the potential impact storm water runoff will have, if any, on the protected water bodies and shall provide a mitigation plan showing how these impacts will be averted.*

c. *The functional values of the identified resource are defined by their natural characteristics, quantity, and quality.*

d. *Erosion and sedimentation control plan adequate to keep sedimentation out of water bodies.*

e. *Alternative locations, design modifications, or alternative methods of development of the subject property to reduce the impacts on the water supply intakes, aquifer, and natural riparian resources are identified and evaluated.*

f. *If there is any resulting degradation or loss of functional values of the natural resource as a result of development, a mitigation plan is required which will compensate for the degradation or loss.*

**Response:** No new development activity is proposed within the NR Overlay. Existing developed areas within the overlay will continue to be used for accessory uses such as vehicle circulation, parking, and storage. Considering there will be no new impacts within the NR Overlay, an impact evaluation is not necessary. This standard does not apply.

#### **17.16.100 Floodplain Overlay District**

2. *LOCATION. All areas designated as flood plain on the Federal Insurance Rate Maps (FIRM).*

7. *LANDS TO WHICH THIS CODE SECTION APPLIES. This code section shall apply to all areas of special flood hazards within the jurisdiction of the City of Stayton.*

**Response:** Per FEMA Flood Rate Insurance Map (FIRM) 41047C0716G, the Subject Site is not located in a Special Flood Hazard Area. A FIRMette is attached for reference as Exhibit 6. This section is not applicable.

## **CHAPTER 17.20 DEVELOPMENT AND IMPROVEMENT STANDARDS**

### **17.20.030 Dimensional Restrictions**

1. *LOCATION OF BUILDINGS. Every building erected shall be located on a lot as herein defined.*

**Response:** As shown on Sheet C1.10 of Exhibit 5, three (3) buildings (two (2) warehouses and one (1) guard shack) are located on the Subject Site. This standard is met.

2. *YARDS APPLY ONLY TO ONE BUILDING. No required yard or open space provided for any building to comply with requirements of this code shall be considered as providing a yard or open space for any other building. No required yard or open space on an adjoining lot shall be considered as providing a yard or open space on the lot whereon the building is to be erected.*

**Response:** The calculation and classification of yards for each individual building follow the requirements of Section 17.20.030.2. Setback calculations for each building are listed in the applicant response under Section 17.16.070.3, above. This standard is met.

3. *SETBACKS. The setback provision cited below modify the building setbacks for Residential Zones cited in Chapter 17.16, but are applicable only to the specific items listed below.*

[detailed provisions omitted for brevity]

**Response:** The Subject Site is in the Light Industrial (IL) zone, and not a Residential Zone. This standard is not applicable.

### **17.20.040 Special Regulations for Accessory Buildings**

1. *APPLICATION OF REGULATIONS. The regulations set forth herein shall apply to all residential zones and to buildings in any other zone used in connection with residential purposes.*

**Response:** The Subject Site is located in the Light Industrial (IL) zone, and is not used in connection with residential purposes. This section is not applicable.

### **17.20.050 Fences**

3. *INDUSTRIAL ZONES.*

- a. *Fences shall be set back from the front lot line in order to accommodate the buffering requirements of 17.20.090.12.*

**Response:** No new fencing is proposed as part of this development.

- b. *Fences shall not be taller than 7 feet in height. In addition, 18 inches over the maximum standard shall be allowed to string barbed wire along the top of the fence for security purposes.*

**Response:** Existing site fencing consists of 5 feet and 6 feet high chain-link fencing, with barbed wire atop. The total height of the fence, including barbed wire, does not exceed 8 feet 6 inches. This standard is met.

4. *USE OF HAZARDOUS MATERIALS. Fences shall not be constructed of or contain any material which will do bodily harm such as barbed wire (except as necessary for security fences in commercial and*

*industrial districts), electric wires (other than stock fences), broken glass, spikes, and any other hazardous or dangerous material.*

**Response:** The site has security chain-link fencing with barbed wire atop as shown in Exhibit 5, Sheets C1.00 and C1.10. Security fencing and barbed wire are allowed per this provision. This standard is met.

### **17.20.060 Off-Street Parking and Loading**

2. *NEW AND EXISTING FACILITIES. Off street automobile parking areas and off street loading areas as set forth below shall be provided and maintained:*

a. *For any new building.*

**Response:** No new building is proposed. This standard is not applicable.

b. *When additional seating capacity, floor area, guest rooms, or dwelling units are added to an existing building.*

**Response:** No additional seating capacity, floor area, guest rooms, or dwelling units are being added to the existing buildings. This standard is not applicable.

c. *When the use of a building as identified in Section 17.20.060.7.a is changed and would require additional parking areas or off street loading areas under the provisions of that section.*

**Response:** The use of the subject buildings and site is currently warehousing. The buildings will be configured to accommodate multiple tenants, which may include a range of manufacturing, construction, transportation and warehousing, wholesale trade, and accessory uses as allowed in the IL Zone; however, warehousing is anticipated to remain as the predominant use. Following the proposed modifications, the total building area on the site will be 545,476 SF. As shown in Exhibit 5, Sheet C1.10, the proposed site plan would retain 150 existing on-site parking spaces, and provide an additional 118 spaces, for a total of 268 spaces. The proposed amount and configuration of off-street parking spaces will provide flexibility to accommodate a range of uses and meet off-street parking requirements as identified under Section 17.20.060.7.B. For example, if 50,000 SF of building area were used for commercial or industrial uses requiring one (1) space per 1,000 SF, 50 spaces would be required in addition to 143 spaces required for the remaining 475,434 SF of warehouse area (0.3 spaces per 1,000 SF) for a total of 193 spaces. The final configuration of potential uses is yet to be determined, but as described, the proposed 268 off-street parking spaces will provide flexibility to accommodate a range of options. This standard is met.

4. *REDUCTION OF REQUIRED AREAS PROHIBITED. Off street parking and loading areas which existed on February 1, 1990 shall not be reduced below the required minimum as set forth in this title unless a parking plan is approved by the City Planner as being suitable to meet the needs of the use or uses proposed.*

**Response:** The applicant is not requesting a reduction of the required minimum parking. This standard is not applicable.

5. *LOCATION. Off street parking and loading areas shall be provided on the same lot with the main building or use except that in any commercial, industrial, or public district, the parking area may be located within 500 feet of the main building.*

**Response:** All existing and proposed off-street parking and loading areas are provided on the same lot as the buildings. This standard is met.

6. *JOINT USE. A parking area may have joint use by 2 or more businesses only when it can be shown that all uses can be adequately served at their respective peak hours and cross-over easement agreements are obtained from all users.*

**Response:** No joint use of the parking areas with nearby properties is proposed. This standard is not applicable.

7. *REQUIREMENTS FOR AUTOMOBILE PARKING. Off-street automobile parking shall be provided in the manner required by subsection 9 of this section and approved by the City Planner in the minimum amounts described in Tables 17.20.060.7 a and b or as determined by Section 17.20.060.7.a.*

a. *Minimum Required Parking Spaces*

<b>TABLE 17.20.060.7.b COMMERCIAL AND INDUSTRIAL PARKING REQUIREMENTS (EXCERPT)</b>		
<i>Commercial and Industrial Uses</i>	<i>Per 1,000 Sq Ft</i>	<i>Other Requirements</i>
<i>Construction/Contractor Facility, excluding office</i>	<i>1</i>	
<i>Manufacturing</i>	<i>1</i>	
<i>Self-Storage Facility</i>	<i>1</i>	
<i>Repair &amp; Maintenance Facility</i>	<i>2</i>	
<i>Warehouse: 0-49,999 sq. feet</i>	<i>1</i>	
<i>Warehouse: 50,000-99,000 sq. feet</i>	<i>0.5</i>	
<i>Warehouse: 100,000 or more</i>	<i>0.3</i>	
<i>Wholesale establishment*</i>	<i>1</i>	<i>Plus 1 space per 700 square feet of net area for sales and display of merchandise</i>

**Response:** As described above, the buildings will be configured to accommodate multiple tenants, which may include a range of manufacturing, construction, transportation and warehousing, wholesale trade, and accessory uses as allowed in the IL Zone; however, warehousing is anticipated to remain as the predominant use. Following the proposed modifications, the total building area on the site will be 545,476 SF. As shown in Exhibit 5, Sheet C1.10, the proposed site plan would retain 150 existing on-site parking spaces and provide an additional 118 spaces, for a total of 268 spaces. The proposed amount and configuration of off-street parking spaces will provide flexibility to accommodate a range of uses and meet off-street parking requirements as identified under Section 17.20.060.7.B. This standard is met.

- b. *Calculating Spaces. When the required spaces are calculated by this subsection becomes greater than 1/3 of a space, the number shall be rounded up.*

**Response:** This requirement has been used in calculating the number of required parking spaces.

- c. *Determining Requirements for an Unlisted Use. When a required number of parking spaces is not specified for a particular use or facility or the Planning staff determines that the specified number of parking spaces is not appropriate, the City Planner shall prescribe a number of vehicle parking spaces or loading berths based on a determination of the traffic generation of the activity (as determined through a Traffic Impact Analysis), the amount or frequency of loading operations thereof, the time of operation of the activity, their location, and such other factors as effect the need for off street parking or loading.*

**Response:** No unlisted uses are proposed as part of this application. This provision is not applicable.

d. *Additional Parking Required. The decision authority may require additional parking beyond the minimum parking requirements of Table 17.20.060.7.b when it finds:*

1) *There are other similar uses in the City of Stayton that provide parking in amount similar to the required minimum and have experienced problems associated with too little parking availability;*

**Response:** During the pre-application conference, City staff did not indicate problems associated with too little parking for similar uses in the City. Therefore, the minimum parking requirements will be adequate. This standard is met.

2) *The site is more than 300 feet from a public parking lot; or*

**Response:** The site is located more than 300' from a public parking lot, but adequate parking to serve the use is located on site.

3) *There are physical constraints preventing spillover parking from being accommodated off-site such as, topography, adjacent water bodies, barriers to effective and safe pedestrian access, or no adjacent uses or streets.*

**Response:** All parking is located on site. This standard is not applicable.

e. *Downtown Parking Standards.*

1) *Minimum Parking Requirements. The provisions of Section 17.20.060.7.a above do not apply within the CCMU, DCMU, and DRMU zones. The City recognizes that the Downtown Zones have provision for public parking and shared parking spaces as well as a supply of on-street parking without adverse affects on traffic movement. Therefore there is no required minimum off-street parking for non-residential uses in the CCMU, DCMU, and DRMU zones. Residential uses in the DCMU and DRMU zones must provide a minimum of 1.0 parking space per dwelling unit.*

2) *Maximum Off-Street Parking Permitted. In order to prevent off-street parking from covering more land area than necessary, a maximum parking limit is established in the CCMU, DCMU, and DRMU zones. In these zones, a property shall not provide more parking spaces than 125% of the minimum otherwise required by Section 17.20.060.7.a for the uses on the property, except a residential use may provide up to 2.0 parking spaces per dwelling unit provided at least one of the spaces is within an enclosed garage.*

**Response:** The Subject Site is not located downtown and is in the IL zone. This standard is not applicable.

f. *Drive-Through Facilities Standards. When drive-through uses and facilities are proposed, they shall conform to all of the following standards:*

[detailed provisions omitted for brevity]

**Response:** No drive-through facility is proposed. This standard is not applicable.

g. *Off-street parking reductions. The decision authority may reduce the off-street parking standards of Table 17.20.060.7.b for sites with one or more of the following features:*

1) *The site has an existing or planned bus stop located adjacent to it, and the site's frontage is improved with a bus stop shelter, consistent with the standards of the*

*applicable transit service provider: Allow up to a 20 percent reduction to the required number of automobile parking spaces;*

**Response:** No bus stops exist or are planned adjacent to the subject site. This standard is not applicable.

2) *The site has one (1) or more dedicated parking spaces for carpool or vanpool vehicles: Allow up to a 10 percent reduction to the required number of automobile parking spaces;*

**Response:** No dedicated carpool or vanpool spaces exist or are included as part of this proposal. This standard is not applicable.

3) *The site has dedicated parking spaces for motorcycles, scooters, or electric carts: Allow reductions to the standard dimensions for these parking spaces;*

**Response:** No dedicated parking spaces for motorcycles, scooters, or electric carts exist or are included as part of this proposal. This standard is not applicable.

4) *The site has more than one and a half the minimum number of required bicycle parking spaces: Allow up to a 5 percent reduction to the required number of automobile parking spaces.*

**Response:** The site does not exceed the minimum number of required bicycle parking spaces by more than 50%. This standard is not applicable.

8. **HANDICAPPED/DISABLED PARKING.**

a. *Except for single family residences and duplexes, parking spaces and accessible passenger loading zones reserved exclusively for use by handicapped or disabled persons shall be provided in accordance with Table 17.20.060.8.a and shall be located on the shortest possible accessible circulation route to an entrance of the building being accessed:*

<b>TABLE 17.20.060.8.A HANDICAPPED PARKING REQUIREMENTS</b>	
<b>Total Spaces</b>	<b>Minimum Required H/D Spaces</b>
1 to 25	1
26 to 50	2
51 to 100	4
101 to 200	6
201 to 300	7
301 or more	7 plus 1 for each 50 spaces over 300

**Response:** As shown in Exhibit 5, Sheet C1.10, the site will have 268 parking spaces, including 7 ADA accessible spaces. This standard is met.

b. *Handicapped/disabled parking spaces shall be designated as reserved for such use by a sign showing the international symbol of accessibility. Such a sign shall be designed so as to not be obscured by a vehicle parked in the space.*

**Response:** All ADA accessible spaces will be designated in accordance with this requirement and applicable provisions of the Oregon Structural Specialty Code. This standard is met.

c. *Parking spaces for handicapped/disabled persons shall be at least 9 feet wide and 18 feet long, and shall have an abutting access aisle of at least 6 feet in width.*

**Response:** As shown in Exhibit 5, Sheet C1.11, the proposed ADA accessible spaces and abutting access aisles meet these dimensional requirements. This standard is met.

d. *Passenger loading zones shall provide an access aisle at least 4 feet wide and 20 feet long abutting and parallel to the vehicle pull-up space. If there are curbs between the access aisle and the vehicle pull-up space, then a curb ramp shall be provided.*

**Response:** No passenger loading zones are required as part of this proposal. This standard is not applicable.

9. **OFF STREET LOADING REQUIREMENTS.** *Off street loading space shall be provided and maintained as listed below in the case of new construction, alterations, and changes of use.*

a. *The following minimum off-street loading bays or berths shall be provided.*

1) *Office buildings, hotels, and motels with a gross floor area of more than 25,000 square feet require one bay.*

**Response:** No office building, hotel, or motel is proposed, or exists on the Subject Site. This standard is not applicable.

2) *Except in the Downtown zones, retail, wholesale, warehouse and industrial operations with a gross floor area of more than 5,000 square feet require the following:*

<b>TABLE 17.20.060.9.A MINIMUM LOADING BAY REQUIREMENTS</b>	
<b>Square Feet (gross floor area)</b>	<b>Number of Bays</b>
5,001 to 40,000	1
40,001 to 70,000	2
70,001 to 100,000	3
100,001 to 140,000	4

*Each 90,000 square feet over 140,000 square feet requires one additional bay.*

*In the Downtown zones loading bays are not required. However, site design for retail trade uses and eating and drinking places shall provide for delivery access from an alley where possible and shall otherwise allow delivery vehicles to park in such a manner as to not block a sidewalk or driveway entrance from a street.*

**Response:** The existing warehouse buildings comprise 525,434 SF of floor area, plus 12,545 SF of existing and 7,497 SF of proposed canopy area over loading bays, for a total building area of 545,476 SF. Therefore, nine (9) loading spaces are required for the buildings. As shown on Sheets C1.10 and A1.10, of Exhibit 5, over 60 loading bays are provided. This standard is met.

b. *Each loading bay shall be a minimum of 12 feet wide and 14 feet high. Truck parking in front of the bay shall be a minimum of 40 feet long exclusive of streets, alleys, driveway, or sidewalks.*

**Response:** Loading bays are approximately 19 feet 5 inches in width, and 17 feet 10 inches in height as shown on Sheets C1.11 and A2.11 through A2.14 of Exhibit 5. Truck parking in front of the loading bays is approximately 60' in length. This standard is met.

c. *Loading spaces shall be designed so delivery or shipment vehicles do not block access aisles of parking areas, any parking spaces, or extend into a public right-of-way.*

**Response:** Loading spaces are designed for efficient and safe delivery. When loading and unloading, delivery vehicles will not block access aisles or parking spaces or extend into the public right-of-way. This standard is met.

*d. No loading area shall be located within 10 feet of a street curb or 5 feet of a front lot line.*

**Response:** As shown on Sheet C1.10 of Exhibit 5, no loading area is located within 10 feet of a street curb or 5 feet of a front lot line. This standard is met.

9-A. **BICYCLE PARKING REQUIREMENTS**

1) *The spaces required for bicycle parking is defined in Table 17.20.060.9-A.1. Fractional numbers of spaces shall be rounded up to the next whole space.*

<b>TABLE 17.20.060.9-A.1 BICYCLE PARKING REQUIREMENTS (EXCERPT)</b>	
<b>Land Use Category</b>	<b>Minimum Required Bicycle Parking Spaces</b>
<b>Industrial</b>	
<i>Industrial Park</i>	<i>1 per 10,000 ft<sup>2</sup></i>
<i>Warehouse</i>	<i>2 or 0.1 space per 1000 ft<sup>2</sup>, whichever is greater</i>
<i>Manufacturing</i>	<i>2 or 0.15 space per 1000 ft<sup>2</sup>, whichever is greater</i>
<i>Other Uses</i>	<i>For uses not defined in this table, The Planning Commission shall have the authority to set bicycle parking requirements.</i>

*a. Bicycle parking spaces shall be at least 6 feet long and 2 feet wide. If the bicycle parking space is covered, then it shall have an overhead clearance of at least 7 feet. For covered bicycle parking, the covering shall extend at least 2 feet beyond the parking area.*

*b. To provide for bicycle maneuvering, an aisle of 5 feet shall be provided and maintained beside or between each row of bicycle parking.*

**Response:** The existing use of the subject site is warehousing, which is anticipated to remain the predominant use. There is currently no bicycle parking provided on-site, which is a non-conforming condition. Considering the proposal is not a change in use which generates additional traffic to and from the site, the proposal does not increase the non-conformance beyond current conditions. This standard does not apply.

10. **DEVELOPMENT REQUIREMENTS.** *All parking and loading areas shall be developed and maintained as follows:*

*a. The location of parking and loading, except for single family dwellings, duplexes, or triplexes, which may be located within the front yard, shall meet the applicable standards of Sections 17.20.190 or 17.20.200.*

**Response:** The standards referenced in this requirement apply to residential and commercial districts. The subject site is in an industrial district. This standard is not applicable.

*b. Surfacing. All driveways, parking and loading areas shall be paved with asphalt or concrete surfacing and shall be adequately designed, graded, and drained as required by the Public Works Director. In no case shall drainage be allowed to flow across a public sidewalk. Parking areas containing more than 5 parking spaces shall be striped to identify individual parking spaces.*

**Response:** All existing and proposed driveways, parking, and loading areas meet these surfacing requirements. Refer to Exhibit 5, Sheet C1.10. This standard is met.

- c. *Driveways. The following standards shall apply to all driveways:*
- 1) *Residential lots with 3 or fewer dwelling units sharing a driveway shall have 16 feet of paved width with 20 feet of clear width.*
  - 2) *Residential lots with 4 or more dwelling units sharing a driveway shall have 18 feet of paved width with 24 feet of clear width*

**Response:** The Subject Site is an industrial lot, not a residential lot. This standard is not applicable.

- d. *Design of parking areas. Except where provided for by subsection 7 of this section parking area design shall comply with Title 12 and Standard Specifications.*

- 1) *Entrances and exits shall be clearly marked with pavement markings and/or signs. Entrances and exits should favor right hand turns into and out of the area where possible and should be located at least 50 feet from intersections where possible.*

**Response:** No changes are proposed to the existing site entrances and exits. Refer to Exhibit 5, Sheets C1.00 and C1.10. This standard is met.

- 2) *Backing into or across a street, sidewalk, or right-of-way from any parking area shall be prohibited. The perimeter shall prevent access to or from the parking area except at designated entrances and exits.*

**Response:** The design of the parking area and site access points does not require any vehicle to back into or across a street, sidewalk or right of way. The frontage of the site is curbed and fenced, except for existing entrances and exits. This standard is met.

- e. *Screening. When any development with over 6 parking spaces or a loading area is adjacent to any residential district, that area shall be screened from all adjacent residential properties. Screening shall be done with an ornamental fence, wall, or hedge at least 4 feet high but not more than 7 feet high, except along an alley.*

**Response:** The subject site contains over six (6) parking spaces and multiple loading areas, but this application does not propose any new parking spaces or loading areas adjacent to a residential district. Existing parking and loading areas along W Washington Street are not screened and a residential district is located across the street to the north. While these areas are non-conforming, this proposal will not increase the degree of nonconformity beyond current conditions.

- f. *Lighting. Any light used to illuminate a parking or loading area shall meet the standards of Section 17.20.170.*

**Response:** A lighting plan is included in Exhibit 5, Sheet C1.50. The standards of Section 17.20.170 are addressed in greater detail later in this report, demonstrating the proposal satisfies the applicable requirements. This standard is met.

11. *PARKING AREA LANDSCAPING DESIGN STANDARDS. Landscaping required by the following standards shall be counted towards the overall landscaping requirements of Section 17.20.090.*

- a. *Perimeter Landscaping. All parking areas shall be landscaped along the property boundaries as required by 17.20.090.11.*

**Response:** The proposed new parking stalls in the northeast corner of the site will include perimeter landscaping. Refer to Exhibit 5, Sheets L1.10 and L1.14. No new perimeter landscaping is proposed for existing non-conforming parking areas. This application will not increase the non-conformity of any existing non-conforming parking areas. This standard is met.

- b. *Interior Landscaping. Interior landscaping of parking areas with 20 or more parking spaces shall meet the following standards.*

- 1) *One landscaped island shall be required for every 10 parking spaces in a row. The interior islands shall be a minimum of 6 feet in width (as measured from the inside of the curb to the inside of the curb) and shall include a minimum of 1 tree per island.*

**Response:** For proposed new parking areas, landscaped islands and trees are provided in accordance with this standard. Trees are proposed for each new island except where precluded by utilities (e.g., fire hydrants). Refer to Exhibit 5, Sheets L1.10 through L1.14. This standard is met.

- 2) *Divider medians between rows of parking spaces, that are a minimum of 6 feet in width (as measured from the inside of the curb to the inside of the curb) may be substituted for interior islands, provided that 1 tree is planted for every 40 feet and shall be landscaped in accordance with Section 17.20.090. 8. Where divider medians are parallel with the buildings, there shall be designated pedestrian crossings to preserve plant materials.*

**Response:** The design of the proposed new parking areas does not include divider medians. This standard does not apply.

- 3) *A row of parking spaces shall be terminated on each end by a terminal island that is a minimum of 6 feet in width (from the inside of the curb to the inside of the curb). The terminal island shall have 1 tree is planted and shall be landscaped in accordance with Section 17.20.090.8.*

**Response:** For proposed new parking areas, terminal islands with trees and landscaping are provided in accordance with this standard, except where precluded by utilities such as fire hydrants. Refer to Exhibit 5, Sheets L1.10 through L1.14. This standard is met.

- 4) *At the sole discretion of the decision authority, the requirement for landscaped islands or medians may be met through the design of additional parking area landscaping if the configuration of the site makes the use of islands or medians impractical.*

**Response:** The proposed landscaping for new off-street parking areas meets applicable requirements, so no alternative configuration is requested. This standard does not apply.

- 5) *Approved Parking Area Trees. Tree species for parking area plantings shall be selected from a list of approved species maintained by the Director of Public Works. Other varieties may only be used with approval of the decision authority.*

**Response:** Approved trees have been selected for the proposed parking area. Refer to the plant schedule on Sheet L0.01, Exhibit 5. This standard is met.

- 6) *Preservation of existing trees is encouraged in the off street parking area and the City Planner may allow these trees to be credited toward the required total number of trees.*

**Response:** No existing trees are proposed to be removed as part of this application. This standard does not apply.

c. *Pedestrian Access. Off street parking areas shall be required to meet the following pedestrian access standards:*

- 1) *The off street parking and loading plan shall identify the location of safe, direct, well lighted and convenient pedestrian walkways connecting the parking area and the buildings.*

**Response:** The existing non-conforming off-street parking areas do not have identified pedestrian walkways. The proposed new parking areas are located adjacent to corresponding tenant entrances and therefore do not require separated walkways. This standard is met.

2) *All pedestrian walkways constructed within parking lots areas be raised to standard sidewalk height.*

**Response:** No pedestrian walkways within parking lots are included as part of this application. This standard does not apply.

3) *Pedestrian walkways shall be attractive and include landscaping and trees.*

**Response:** No pedestrian walkways within parking lots are included as part of this application. This standard does not apply.

### **17.20.070 Open Storage Areas and Outdoor Storage Yards**

1. *OPEN STORAGE AREAS. Where allowed by zoning districts, the development and use of open storage areas shall conform to the following standards.*

a. *Open storage areas shall not occupy designated parking areas.*

**Response:** Open storage is allowed in the Light Industrial (IL) zone. As shown on Sheet C1.10 of Exhibit 5, the trailer spaces or yard are located in designated outdoor storage areas, not areas designated as parking areas. This standard is met.

b. *Open storage areas located between the street right-of-way and the building shall not exceed 25% of the area between the front lot line and a parallel line drawn from the nearest point of the building.*

**Response:** As shown on Sheet C1.10 of Exhibit 5, no open storage is located within the area between the front lot line and a parallel line drawn from the nearest point of the building. This standard is met.

2. *OUTDOOR STORAGE YARDS. Where allowed by zoning districts, the development and use of outdoor storage yards shall conform to the following standards.*

a. *Outdoor storage yards that are adjacent to Commercial or Residential districts or are directly across the street right-of-way from those districts shall be enclosed with an ornamental, sight-obscuring fence or wall of at least 6 feet in height, or a compact evergreen hedge planted at 3 feet in height and capable of obtaining a minimum height of 6 feet.*

**Response:** Commercial and Residential districts abut the subject site to the north and east. Historically, outdoor storage adjacent to these districts has occurred in the northwest and northeast corners of the site, and those areas will continue to be used as such. No new open storage areas will be sited adjacent to Commercial or Residential districts, or directly across a street right-of-way from those districts. While some of the existing outdoor storage areas do not conform to this requirement, the proposal would not increase the nonconformity. This standard is met.

b. *If any material or equipment projects above the 6 foot screen, then a screening plan must be submitted to the Planning Commission for approval.*

**Response:** As described above, there are existing non-conforming storage areas on the site, but the proposal will not increase the non-conformance of those areas. Therefore, no screening is required, and this standard is not applicable.

c. *The surface of such area shall be maintained at all times in a dust-free condition, except that all driveways and loading areas shall be paved as required in Section 17.20.060.10.b.*

**Response:** The surfaces of outdoor storage areas will be pavement and/or crushed rock and will be maintained at all times in a dust-free condition. See Sheet C1.10 of Exhibit 5. This standard is met.

d. *Any lighting maintained in conjunction with material and equipment storage areas shall be so oriented as to not shine on or reflect into abutting properties or streets.*

**Response:** The proposed lighting plan is shown on Sheet C1.50, Exhibit 5, which includes photometrics, fixture specifications, and mounting height. All proposed fixtures are full cut-off and will be oriented such that they do not shine on or reflect into the abutting properties or streets.

### **17.20.080 Special Street and Riparian Setbacks**

1. **SPECIAL STREET SETBACKS.** *On the following named streets there shall be a minimum building setback of 50 feet, measured at right angles from the centerline of the street right-of-way:*

c. *Washington Street, extending from N. Sixth Avenue to the west city limits.*

**Response:** The subject site is located on Washington Street between N Sixth Avenue and the west city limits and is subject to this requirement. As identified on Sheet C1.10, Exhibit 5, the minimum distance from the existing building to the street centerline is 50 feet 6 inches. This standard is met.

2. **RIPARIAN SETBACK AND VEGETATION MAINTENANCE REQUIREMENTS.**

a. *Application of Riparian Setback Standards. Setbacks for development as defined in this title shall be observed for all lands within the City adjacent to Mill Creek, Salem Ditch, Stayton Ditch, and the North Santiam River.*

**Response:** The subject site is adjacent to Salem Ditch and is subject to the riparian setback standards set forth in this section.

b. *Riparian Setback Areas. The riparian setback area for all new development other than a fence, sign, or pedestrian way, except as allowed under c. of this subsection, shall be 15 feet from normal high water along the Salem Ditch, Stayton Ditch and 35 feet along Mill Creek and the North Santiam River.*

**Response:** No new development is proposed within the required 15-foot riparian setback from Salem Ditch. Refer to Exhibit 5, Sheet C1.10. This standard is met.

c. *Improvements Within Setback Areas. Along the Salem Ditch and Stayton Ditch, decks or patios attached to a dwelling which do not exceed 4 feet above ground level may extend into the setback area no more than 5 feet from normal high water.*

**Response:** The subject site does not contain a dwelling and no improvements are proposed within required riparian setback areas. This standard is not applicable.

d. *Vegetation Maintenance Standards. Within the riparian setback area, the following standards for maintenance of riparian vegetation shall apply:*

1) *Along Mill Creek and the North Santiam River, no more of a parcel's existing riparian vegetation shall be removed from the setback area than is necessary for the placement or development, outside of the riparian zone, of use(s) permitted by the zoning district. Vegetation removed in such a manner shall, to the extent*

*practicable, be replaced with similar or the same indigenous vegetation during the next planting season. In no case shall more than 25% by area on any given lot, of existing natural riparian vegetation shall be removed for any reason within the riparian setback area.*

**Response:** The subject site is not located along Mill Creek or the North Santiam River. This standard is not applicable.

2) *Dead or diseased vegetation or vegetation which constitutes a hazard to public safety or a threat to existing healthy indigenous vegetation.*

a) *Vegetation to be removed for pedestrian access (pathways) to, or along the waterway.*

**Response:** The site does not contain pedestrian access to, or along the Salem Ditch. This standard does not apply.

b) *Removal of vegetation necessary for the maintenance or placement of artificial or structural shoreline stabilization, provided a showing is made that natural erosion control measures or other non-structural solutions are not feasible and only where applicable state and federal standards are met.*

**Response:** No shoreline stabilization is proposed. This standard does not apply.

c) *Removal of blackberry vines, scotch broom, or other introduced or invasive species, provided that such vegetation is replaced with other species that are equally suited for ground cover and erosion control.*

**Response:** No vegetation removal within the riparian setback area is proposed as part of this application. This standard does not apply.

3) *Along the Salem Ditch the setback area may be used for residential landscaping adequate to maintain soil stability.*

**Response:** No residential landscaping is proposed. This standard does not apply.

e. *Variance from Riparian Vegetation Requirements. Requests for relief from the above standards shall be processed pursuant to the variance process specified in Section 17.12.190.*

**Response:** The applicant is not seeking a variance from the above standards.

**17.20.090 Landscaping and Screening General Standards**

2. **BASIC PROVISIONS.** *Landscaping and screening standards apply to all zones except the Low Density (LD) Residential and Commercial Core Mixed Use. The minimum area of a site to be retained in landscaping shall be as follows:*

<b>TABLE 17.20.090.2 MINIMUM LANDSCAPE PERCENTAGE</b>	
<b>Zoning District or Use</b>	<b>Minimum Improvement Per Lot</b>
<i>Medium Density (MD) Residential</i>	<i>20%</i>
<i>High Density (HD) Residential</i>	<i>20%</i>
<i>Commercial Retail (CR)</i>	<i>15%</i>
<i>Commercial General (CG)</i>	<i>15%</i>
<i>Downtown Commercial Mixed Use (DCMU)</i>	<i>8%</i>
<i>Downtown Residential Mixed Use (DRMU)</i>	<i>8%</i>

<i>Interchange District (ID)</i>	15%
<i>Industrial Commercial (IC)</i>	15%
<i>Light Industrial (IL)</i>	
<i>Lots 2.00 acres in area or less</i>	15%
<i>Lots larger than 2.00 acres but smaller than 4.00 acres</i>	10%
<i>Lots of 4.00 acres in area or more</i>	8%
<i>Public, Semi-Public (P)</i>	15%

**Response:** The Subject Site is located in the IL Zone and is larger than four (4) acres in area, so the minimum landscape percentage is 8%. As shown on Sheet C1.10 of Exhibit 5, 23% of landscaping is provided. This standard is met.

3. *SUBMITTAL REQUIREMENTS FOR LANDSCAPE PLAN. The following information shall be included on a landscape plan:*

a. *Lot dimensions and footprint of structure(s), drawn to scale.*

**Response:** Lot dimensions and the footprint of the buildings are shown on Sheets C1.10 and L1.10 of Exhibit 5. This standard is met.

b. *The dimensions and square footage of all landscaped areas, the total square footage of the parking lot, building square footage, and total number of parking spaces.*

**Response:** This information is shown on Sheet C1.10 and L1.10 of Exhibit 5. This standard is met.

c. *The location and size of the plant species, identified by common and botanical names, and expected size within 5 growing seasons.*

**Response:** This information is shown on Sheet L0.01 of Exhibit 5. This standard is met.

d. *The type and location of landscaping features other than plant materials, including, but not limited to, wetlands, creeks, ponds, sculptures, benches, and trash receptacles.*

**Response:** This information is shown on Sheets C1.10 and L1.10 of Exhibit 5. This standard is met.

e. *Adjacent land-uses. For any residence within 50 feet of the subject site, indicates the building's location and its distance from the subject property boundary.*

**Response:** Residences are within 50 feet of the subject site's eastern boundary and are shown on Sheet C1.10. This standard is met.

f. *Location and classification of existing trees greater than 4 inches caliper and measured at 4 feet above ground. Where the site is heavily wooded, only those trees that will be affected by the proposed development need to be sited accurately. The remaining trees may be shown on the plan in the general area of their distribution.*

**Response:** This information is shown in Exhibit 4 and on Sheets C1.10 and L1.10 of Exhibit 5. This standard is met.

4. *SUBMITTAL REQUIREMENTS FOR IRRIGATION PLAN. The irrigation plan shall indicate the source of water and show the materials, size and location of all components, including back flow or anti-siphon devices, valves, and irrigation heads.*

a. *Minimum Landscape Standards.*

1) *Appropriate care and maintenance of landscaping on-site and landscaping in the adjacent public right-of-way is the right and responsibility of the property owner, unless the Code specifies otherwise for general public and safety reasons. If street trees or other plant material do not survive or are removed, materials shall be replaced in kind within 1 year.*

**Response:** The applicant acknowledges its ongoing responsibility to maintain landscaping.

- 2) *Significant plant and tree specimens should be preserved to the greatest extent practicable and integrated into the design of the development. Trees of 25 inches or greater in circumference measured at a height of 4 feet above grade are considered significant. Plants to be saved and methods of protection shall be indicated on the detailed planting plan submitted for approval. Existing trees may be considered preserved if no cutting, filling, or compacting of the soil takes place between the trunk of the tree and the area 5 feet outside of the tree's drip line. Trees to be retained shall be protected from damage during construction by a construction fence located 5 feet outside the drip line.*

**Response:** No tree removal is proposed as part of this application. This standard is met.

- 3) *Planter and boundary areas used for required plantings shall have a minimum diameter of 5 feet inside dimensions. Where the curb or the edge of these areas are used as a tire stop for parking, the planter or boundary plantings shall be a minimum width of 7½ feet.*

**Response:** As shown on Sheet C.11 of Exhibit 5, all proposed landscape areas in the proposed parking areas will have widths that exceed 5 feet. Widths of at least 7.5 feet are depicted in areas where the proposed curbs would serve as tire stops. This standard is met.

- 4) *In no case shall shrubs, conifer trees, or other screening be permitted within the sight distance triangle or where the City Engineer otherwise deems such plantings would endanger pedestrians and vehicles.*

**Response:** As depicted on Sheets L1.10-L1.14 of Exhibit 5, the proposed landscaping will be located interior to the site, far from sight distance triangles at vehicle access points to W Washington Street. This standard is met.

- 5) *Landscaped planters and other landscaped features shall be used to define, soften or screen the appearance of off street parking areas and other activity from the public street. Up to 25% of the total required landscaped area may be developed into pedestrian amenities, including, but not limited to sidewalk cafes, seating, water features, and plazas, as approved by the decision authority.*

**Response:** As shown on Sheet L1.14 of Exhibit 5, plantings are proposed between W Washington Street and the proposed parking area in the northeast portion of the site. Plantings are not proposed in existing parking areas north of the building as those are existing nonconforming parking areas. This standard is met.

- 6) *All areas not occupied by parking lots, paved roadways, walkways, patios, or building shall be landscaped.*

**Response:** As shown in Exhibit 5, the applicant proposes to landscape disturbed areas where new parking is proposed. No landscaping is proposed in undeveloped portions of the site or in existing developed areas that will not be disturbed as part of this project. This standard is met.

- 7) *All landscaping shall be continually maintained, including necessary watering, pruning, weeding, and replacing.*

**Response:** The applicant acknowledges its ongoing responsibility to maintain landscaping.

5. **REQUIRED TREE PLANTINGS.** *Planting of trees is required along public street frontages, and along private drives more than 150 feet long. Trees shall be planted outside the street right-of-way except where there is a designated planting strip or a City-adopted street tree plan.*
- a. *Street trees species shall be selected from a list of approved species maintained by the Director of Public Works. Other varieties may be used only with approval by the decision authority.*
  - b. *Spacing of Street Trees. Trees with a medium canopy shall be spaced 20 feet on center. Trees with a large canopy shall be spaced 25 feet on center.*
  - c. *Trees shall be trimmed to a height that does not impede sight distance, pedestrian traffic or vehicular traffic.*

**Response:** The existing public frontage along W Washington Street is non-conforming and does not currently include street trees. As described throughout this report, the proposed use of the property will continue to be industrial, the proposed improvements to the site are minimal and do not increase the non-conformance beyond current conditions, and there will be no increase in trip generation. Therefore, providing street trees would be significantly out of proportion to the impact of the proposal.

6. **TREE PLANTING RESTRICTIONS.** *Street trees shall not be planted:*
- a. *Within 10 feet of fire hydrants and utility poles, unless approved otherwise by the City Engineer.*
  - b. *Where the decision authority determines the trees may be a hazard to the public interest or general welfare.*
  - c. *Under overhead power lines, if tree height at mature age exceeds the height of the power line.*

**Response:** No street trees are proposed. This standard does not apply.

7. **IRRIGATION.** *Due to an increasing public demand for water and the diminishing supply, economic and efficient water use shall be required. Landscaping plans shall include provisions for irrigation. Specific means to achieve conservation of water resources shall be provided as follows:*
- a. *Any newly planted landscaped area shall have a permanent underground or drip irrigation system with an approved back flow prevention device.*
  - b. *Wherever feasible, sprinkler heads irrigating lawns or other high-water demand landscape areas shall be separated so that they are on a separate system than those irrigating trees, shrubbery or other reduced-water requirement areas.*
  - c. *Irrigation shall not be required in wooded areas, wetlands, along natural drainage channels, or stream banks.*

**Response:** As noted on Sheet L0.01 of Exhibit 5, the applicant proposes to use manual irrigation for new landscaped areas, consistent with Section 17.20.090.8.b below. Manual irrigation will be provided to the extent necessary to establish and maintain plant health. Native and climate-adapted plant species have been selected to minimize the need for irrigation and conserve water, which is consistent with the intent of this standard.

8. **REQUIREMENTS FOR PLANT MATERIALS.**
- a. *At least 75% of the required landscaping area shall be planted with a suitable combination of trees, shrubs, evergreens and/or ground cover. The intent of this Section is to avoid large expanses of lawn without other landscaping features and the decision authority shall determine what constitutes a suitable combination of landscape material as part of the review of each landscape plan.*

**Response:** Landscaped areas consist of trees, shrubs, and groundcover. No new areas of lawn are proposed. This standard is met.

- b. *Use of native plant materials or plants acclimated to the Pacific Northwest is encouraged to conserve water during irrigation.*

**Response:** All proposed plants are native or are climate-adapted to the Pacific Northwest. As noted in the response to Section 17.20.090.7, the applicant proposes to use manual irrigation for new landscaped areas until the plants have become established. Refer to the plant schedule on Sheet L0.01, Exhibit 5. This standard is met.

- c. *Trees shall be species having an average mature crown spread greater than 15 feet and having trunks which can be maintained in a clear condition so there is over 5 feet without branches. Trees having a mature crown spread less than 15 feet may be substituted by grouping trees to create the equivalent of a 15 foot crown spread.*

**Response:** All trees were selected from the approved list and have a mature crown spread greater than 15 feet. Refer to the plant schedule on Sheet L0.01, Exhibit 5. This standard is met.

- d. *Deciduous trees shall be balled and burlapped or in a container, be a minimum of 7 feet in overall height or 1.5 inches in caliper measured at 4 feet above ground, immediately after planting. Bare root trees will be acceptable to plant only during their dormant season.*

**Response:** All trees are specified as balled and burlapped and 1.5 inches caliper at the time of planting. Refer to the planting details on Sheet L5.10, Exhibit 5. This standard is met.

- e. *Coniferous trees shall be a minimum 5 feet in height above ground at time of planting.*

**Response:** No coniferous trees are proposed as part of this application. This standard does not apply.

- f. *Shrubs shall be a minimum of 2 feet in height when measured immediately after planting.*

**Response:** Shrubs will meet the minimum planting height requirement. Refer to the plant schedule on Sheet L0.01, Exhibit 5. This standard is met.

- g. *Hedges, where required to screen and buffer off-street parking from adjoining properties shall be planted with an evergreen species maintained so as to form a continuous, solid visual screen, planted with a minimum height of 2 feet.*

**Response:** No hedges are proposed for screening or buffering as part of this application. This standard does not apply.

- h. *Vines for screening purposes shall 30 inches in height immediately after planting and may be used in conjunction with fences, screens, or walls to meet physical barrier requirements as specified.*

**Response:** No vines for screening purposes are proposed as part of this application. This standard does not apply.

- i. *Turf areas shall be planted in species normally grown as permanent lawns in western Oregon. Either sod or seed are acceptable. Acceptable varieties include improved perennial ryegrasses and fescues used within the local landscape industry.*

**Response:** No turf areas are proposed as part of this application. This standard does not apply.

- j. *Landscaped areas may include architectural features such as sculptures, benches, masonry or stone walls, fences, and rock groupings. The exposed area developed with such features shall not exceed 25% of the required landscaped area.*

**Response:** No architectural features in landscaped areas are proposed as part of this application. This standard does not apply.

- k. *Landscaped areas may include minimal areas of non living ground covers where the applicant can demonstrate that plant ground covers are not appropriate. Artificial ground covers such as bark, mulch chips, gravel or crushed stone shall not exceed 15% of the landscaped area. This percentage shall be based on the anticipated size of landscape plants at maturity, not at planting.*

**Response:** Non-living ground covers will not exceed 15% of the landscaped areas. This standard is met.

- l. *Artificial plants are prohibited in any required landscaped area.*

**Response:** No artificial plants are proposed as part of this application. This standard does not apply.

9. **REPLANTING NATURAL LANDSCAPE AREAS**

- a. *Areas that are not affected by the landscaping requirements where natural vegetation has been removed or damaged through construction activity shall be replanted.*

**Response:** Any areas where natural vegetation is removed will either be replanted or improved with paving or rock surfacing for parking or vehicular movement and storage. This standard is met.

- b. *Plant material shall be watered at intervals sufficient to assure survival and growth.*

**Response:** If any replanting is necessary, new plant material will be watered appropriately to assure survival and growth. This standard is met.

- c. *The use of native plant materials or plants acclimated to the Pacific Northwest is encouraged to reduce irrigation and maintenance demands.*

**Response:** If any replanting is necessary, native plants will be used to the greatest extent possible. This standard is met.

10. **LANDSCAPING IN THE PLANTER STRIP.** *Except for portions allowed for parking, loading, or traffic maneuvering, the planter strip shall be landscaped. The planter strip shall not count as part of the lot area percentage to be landscaped.*

**Response:** Most of the existing street frontage does not have a planter strip in the right-of-way, so the applicant has not counted any landscaping within the right-of-way towards landscape percentage. This proposal continues the light industrial use of the subject site and does not result in increased trip generation (see Transportation Analysis Letter, Exhibit 8). Therefore, the impact of the development on transportation is negligible (i.e., right-of-way dedications or street improvements (including installation of new planter strips) would not be proportional to the impact). This standard does not apply.

11. **BUFFER PLANTING-PARKING, LOADING AND MANEUVERING AREAS:** *Buffer plantings are used to reduce building scale, provide transition between contrasting architectural styles, and generally mitigate incompatible or undesirable views. They are used to soften rather than block viewing. Where required, a variety of plants shall be used to achieve the desired buffering effect.*

- a. *Buffering is required for any commercial, industrial, or multi-family development with more than 4 parking spaces. Buffering shall occur in the following manner:*

- 1) *Any parking area, loading area, or vehicle maneuvering area shall be landscaped along property boundaries. The landscaped area shall meet the minimums in Table 17.20.090.11.a.1*

**Response:** New parking areas which abut property boundaries will be landscaped in accordance with this section. No modifications are proposed to existing non-conforming parking areas; however, as a condition of the prior partition approval (Land Use File #PAR

4-05/23), fencing and curb stops encroaching into the W Washington Street right-of-way will be realigned along the property line. The proposal will not cause the existing parking areas to become more non-conforming than current conditions. The proposed landscaping plan can be found in Exhibit 5, Sheet L1.10; the off-street parking plan is shown on Sheet C1.10. This standard is met.

TABLE 17.20.090.11.A.1 BUFFERING REQUIREMENTS IN FEET							
Use of Property	Adjacent Use at Property Line				Adjacent Street		
	Single Family & Duplexes	Multi-Family Dwellings	Commercial	Industrial	Local	Collector	Arterial
Multi-Family Dwellings	5	5	5	5	5	5	5
Commercial	10	5	0	0	15	10	10
Industrial	15	10	5	0	15	10	10

2) *Decorative walls and fences may be used in conjunction with plantings, but may not be used by themselves to comply with buffering requirements and must meet the standards of Section 17.20.050. b. Landscaping with buffer strips may be counted towards meeting minimum percentage landscaping requirements.*

**Response:** No decorative walls or fences are proposed to satisfy buffering requirements. This standard does not apply.

12. *SCREENING (HEDGES, FENCES, WALLS, BERMS). Screening is used where unsightly views or visual conflicts must be obscured or blocked and where privacy and security are desired. Fences and walls used for screening may be constructed of wood, concrete, stone, brick, and wrought iron, or other commonly used fencing/wall materials. Acoustically designed fences and walls are also used where noise pollution requires mitigation.*

- a. *Height and Capacity. Where landscaping is used for required screening, it shall be at least 6 feet in height and be at least 80 percent opaque, as seen from a perpendicular line of sight, within 2 years following establishment of the primary use of the site.*
- b. *Chain Link Fencing. A chain link fence with sight obscuring slats shall qualify for screening only if a landscape buffer is also provided.*
- c. *Height Measurement. The height of fences, hedges, walls and berms shall be measured from the lowest adjoining finished grade, except where used to comply with screening requirements for parking, loading, storage, and similar areas. In these cases, height shall be measured from the finished grade of such improvements. Screening is prohibited within the sight distance triangle.*
- d. *Berms. Earthen berms up to 6 in height may be used to comply with screening requirements. Slope of berms may not exceed 2:1 and both faces of the slope shall be planted with ground cover, shrubs and trees. Bark mulch or other non-living materials shall not be used as the ground cover for an earthen berm.*

**Response:** The subject site includes existing off-street parking and outdoor service areas which do not meet current screening requirements; however, this proposal would not increase the nonconformity beyond current conditions. Therefore, no new screening is proposed as part of this application. This standard does not apply.

## 17.20.140 Signs

### 2. PERMIT PROCEDURES.

- a. *Permit Required. No person shall construct or alter any sign without first obtaining a permit from the City Planner.*

**Response:** No sign construction or alterations are proposed. Potential areas for future signage are identified on the building elevations, Sheets A2.11 and A2.12, Exhibit 5. Applications for sign permits will be obtained as required at a later date. This standard does not apply to the present application.

- b. *Current Signs. Owners of legally existing signs shall not be required to obtain a sign permit.*

**Response:** Permits will not be required for any of the legally existing signs on the site. This standard is met.

### 5. ILLUMINATION OF SIGNS

- a. *No sign shall be comprised of or illuminated by intermittent light except message signs.*

**Response:** No intermittent sign lighting is proposed. This standard is not applicable.

- b. *Externally Illuminated Signs*

- 1) *The average level of illumination on the vertical surface of the sign shall not exceed 3.0 foot-candles, and the uniformity ratio (the ratio of average to minimum illumination) shall not exceed 2:1.*
- 2) *Lighting fixtures illuminating signs shall be carefully located, aimed, and hooded or shielded to prevent direct illumination of public streets or abutting properties.*
- 3) *Light fixtures illuminating signs shall be of a type such that the light source (bulb) is not directly visible from adjacent public streets or properties.*
- 4) *To the extent practicable, fixtures used to illuminate signs shall be top mounted and directed downward (i.e. below the horizontal).*

**Response:** No externally illuminated signs exist or are proposed on the subject site. These standards are not applicable.

- c. *Internally Illuminated Signs.*

- 1) *Internally lit signs are permitted only in the commercial, industrial, public, and downtown zones.*

**Response:** No internally illuminated signs exist or are proposed on the subject site. This standard is not applicable.

### 9. SIGNS IN COMMERCIAL AND INDUSTRIAL ZONES. The following regulations shall apply to signs commercial and industrial zones:

- a. *Signs for businesses not in integrated business centers:*  
[detailed provisions omitted for brevity]

**Response:** The subject site is an integrated business center. These standards do not apply.

- b. *Signs for integrated business centers.*

- 1) *Total Allowed Area.*

- a) *Signs attached to a building for an individual business within an integrated business center shall be no larger than one square foot of sign area for each lineal foot of building frontage for the individual business, up to a maximum of 80 square feet per business. If a building is located more than 50 feet from the front lot line, the maximum sign area may be*

increased by 50%. If a building is located more than 100 feet from the front lot line, the maximum sign area may be increased by 100%. Individual businesses may not assign their unused allowed area to other businesses in the integrated business center.

- b) *Integrated business center. One free-standing sign is permitted for each street on which an integrated business center has frontage. If there is only one street frontage, the sign shall not exceed 150 square feet in area; otherwise, the maximum sign area for each sign shall be 100 square feet.*
  - c) *Businesses that are located in an individual building within the integrated business center may have one freestanding sign in addition to the freestanding sign for the center. The sign shall be no larger than 40 square feet in sign area, no taller than 8 feet above ground, and shall be located within 30 feet of the building in which the business is located.*
- 2) *Maximum Sign Height.*
- a) *Wall or wall mounted signs shall not project above the parapet or roof eaves.*
  - b) *A monument sign shall not exceed 6 feet in height. Any other free-standing sign shall not exceed a total height of 6 feet within the first 10 feet of a property boundary; otherwise, the maximum height is 16 feet.*
- 3) *Location.*
- a) *Wall or canopy signs may project up to 1.5 feet from the building.*
  - b) *Projecting signs may project up to 3 feet from the building, and may project into a street right-of-way. However, any portion of a projecting sign that projects over a street right-of-way shall be at least 8 feet above ground level.*
  - c) *Monument signs shall not project over street right-of-way and they shall not be located within a sight clearance triangle or special street setbacks.*
  - d) *Other free-standing signs shall be setback a minimum of 5 feet from any property line. Any sign located within a sight clearance triangle shall either be no taller than 3 feet in height or have the lowest portion of the sign at least 8 feet in height.*

**Response:** The subject site is an integrated business center. Potential areas for future signage are identified on the building elevations, Sheets A2.11 and A2.12, Exhibit 5. Applications for sign permits will be obtained as required at a later date in accordance with this section. These standards do not apply to the current application.

### **17.20.150 Tree Preservation**

1. *NEW DEVELOPMENT AND REDEVELOPMENT. Except for tree farms, development sites are vigorously encouraged to preserve existing trees. Site plans for new development, grade and fill plans shall disclose the details of tree removal including numbers of trees, size and species of trees to be removed.*

**Response:** No tree removal is proposed as part of this application. This standard is met.

2. *STREET TREES. Unless specifically authorized in writing by the Public Works Director, or designee, no person shall intentionally damage, cut (save pruning), carve, transplant, or remove any street tree; attach any rope or wire (unless required in order to stabilize the tree), nails, advertising posters, or other contrivance; allow any substance which is harmful to such trees to come in contact with them; or set fire or permit any fire to burn when such fire or the heat thereof will*

*injure any portion of any tree. Private property owners are responsible for the maintenance and replacement of street trees within adjacent public rights-of-way.*

**Response:** No street trees will be affected as part of this application. This standard is met.

3. *HERITAGE TREES. Unless specifically authorized in writing by the Public Works Director, or designee, no person shall intentionally damage, cut (save pruning), carve, transplant or remove any Heritage tree; attach any rope or wire (unless required in order to stabilize the tree), nails, advertising posters, or other contrivance; allow any substance which is harmful to such trees to come in contact with them; or set fire or permit any fire to burn when such fire or the heat thereof will injure any portion of any tree. A list of community Heritage trees will be kept and maintained by the City Administrator or designee.*

*Recognition of Heritage Trees. Stayton citizens wishing to have trees recognized by the City as Heritage trees shall submit their request in writing to the City Council. The request shall explain why the subject tree is of exceptional value to the community. A majority vote of approval of the City Council will add the tree to the Heritage Tree list. No tree shall be designated a Heritage tree unless the property owner agrees. Property owners may request the removal of the Heritage Tree designation from trees on their property.*

**Response:** Staff has not informed the applicant of any Heritage trees on site, and the applicant is not requesting the designation of any new Heritage trees. This standard does not apply.

### **17.20.170 Outdoor Lighting**

2. *GENERAL STANDARDS. Lighting may be provided which serves security, safety and operational needs but which does not directly or indirectly produce deleterious effects on abutting properties or which would impair the vision of the traveling public on adjacent roadways. Lighting fixtures with more than 800 lumens of light output shall be cut-off fixtures so that the lighting elements are not exposed to normal view by motorists, pedestrians, or from adjacent dwellings. Direct or indirect illumination shall not exceed 0.5 foot candles upon abutting lots in residential use measured at the property line. Whenever practicable, lighting installations shall include timers, dimmers, and/or sensors to reduce overall energy consumption and eliminate unneeded lighting. When an outdoor lighting installation is being modified, extended, expanded, or added to, the entire lighting installation shall be subject to the requirements of this Section.*

- a. *Electrical service to outdoor lighting fixtures shall be underground unless the fixtures are mounted directly on utility poles.*

**Response:** Electrical service to outdoor lighting will be underground. See Exhibit 5, Sheet C1.50. This standard is met.

- b. *For the purposes of this Section, the mounting height of a lighting fixture shall be defined as the vertical distance from the grade elevation of the surface being illuminated to the bottom of the lighting fixture.*

**Response:** Outdoor light fixture mounting heights are identified in Exhibit 5, Sheet C1.50, measured in accordance with this requirement. This standard is met.

- c. *Holiday lighting during the months of November, December, and January shall be exempt from the provisions of this section, provided that such lighting does not create dangerous glare on adjacent streets or properties.*

**Response:** No holiday lighting is included as part of this application. This standard is not applicable.

3. *PROCESS. When an application for land use approval contains outdoor lighting installation or replacement, the decision authority shall review and approve the lighting installation as part of the application. Lighting installation or replacement that is not part of a land use approval application need not submit a lighting plan or obtain a permit beyond that which may be required by the Electrical Code, but shall meet the standards below.*

**Response:** An outdoor lighting plan is included as part of this application for Site Plan Review. See Exhibit 5, Sheet C1.50. This standard is met.

4. *NON-RESIDENTIAL LIGHTING STANDARDS. The following additional standards shall apply to all commercial, industrial, public and semi-public uses:*

- a. *Lighting of Gasoline Station/Convenience Store Aprons and Canopies. Lighting levels on gasoline station/convenience store aprons and under canopies shall be adequate to facilitate the activities taking place in such locations. Lighting of such areas shall not be used to attract attention to the businesses. Signs allowed under Section 17.20.140 shall be used for that purpose.*

[detailed provisions omitted for brevity]

**Response:** No gasoline stations or convenience stores are proposed as part of this application. This standard is not applicable.

- b. *Lighting of Exterior Display/Sales Areas. Lighting levels on exterior display/sales areas shall be adequate to facilitate the activities taking place in such locations. Lighting of such areas shall not be used to attract attention to the businesses. Signs allowed under Section 17.20.140 shall be used for that purpose. The site plan shall designate areas to be considered display/sales areas and areas to be used a parking or passive vehicle storage areas. This designation must be approved by the decision authority.*

[detailed provisions omitted for brevity]

**Response:** No exterior display/sales areas are proposed as part of this application. This standard is not applicable.

- c. *Lighting of Parking Areas. Parking area lighting shall provide the minimum lighting necessary to ensure adequate vision and comfort in parking areas, and to not cause glare or direct illumination onto adjacent properties or streets.*

- 1) *All lighting fixtures serving parking areas shall be full cut-off fixtures.*

**Response:** The proposed lighting plan, which includes lighting for parking areas, is in Exhibit 5, Sheet C1.50. The lighting plan includes photometric calculations, mounting height, and product specifications for each fixture, demonstrating the proposed lighting meets the applicable standards for industrial zones as specified in Table 17.20.170.4.C.3. All lighting fixtures serving parking areas will be full cut-off fixtures. This standard is met.

- 2) *As an alternative in the Downtown Districts, the design for an area may suggest the use of parking area lighting fixtures of a particular "period" or architectural style, as either alternatives or supplements to the lighting described above.*

**Response:** The subject site is not located in a downtown district. This standard is not applicable.

- 3) *Parking area lighting shall meet the following mounting height, minimum illumination level, and uniformity ratios.*

TABLE 17.20.170.4.C.3 PARKING AREA LIGHTING STANDARDS			
Feature	Commercial Zones	Downtown Zones	Industrial Zones
Maximum Mounting Height	20 feet	14 feet	25 feet
Minimum Illumination Level	0.3 foot-candle	0.3 foot-candle	0.5 foot-candle
Maximum Average Illumination Level	1.6 foot-candle	2.0 foot-candle	2.6 foot-candle
Uniformity Ratio	4:1	4:1	4:1
Minimum Color Rendering Index	65	65	20

**Response:** The proposed lighting plan is included in Exhibit 5, Sheet C1.50, and includes illumination levels and a table detailing the mounting height and color rendering index of each fixture, demonstrating the proposal satisfies the industrial zone requirements listed in the table above. This standard is met.

- d. *Security Lighting. The purpose of and need for security lighting (i.e. lighting for safety of persons and property) must be demonstrated as part of an overall security plan which includes at least illumination, surveillance, and response, and which delineates the area to be illuminated for security purposes. To the extent that the designated areas is illuminated for other purposes (parking or display), independent security lighting is discouraged.*

**Response:** No security lighting is included as part of this application. This standard is not applicable.

### 17.20.230 Industrial Design Standards

#### 2. SITE DESIGN.

- a. *Height Step Down. To provide compatible scale and relationships between new multi-story industrial buildings and existing adjacent dwellings not in an industrial zone, the multistory building shall “step down” to create a building height transition to adjacent single-story dwellings. The transition standard is met when the height of any portion of the taller structure does not exceed 3 feet in height for every 2 feet separating that portion of the multi-story building from the adjacent dwelling. This provision shall apply to any industrial building with a vertical wall height of 14 feet or more, regardless of whether the interior contains more than one story.*

**Response:** No changes to building height are proposed as part of this application. This standard does not apply.

- b. *Outdoor Service Areas. Outdoor service areas shall either face an interior area, side or rear property line, a separate service corridor, a service alley, or a service courtyard.*

- 1) *If the location of an outdoor service area as proscribed by this Section is difficult to accommodate because of site considerations, the decision authority may determine that the service area may be located in another location with additional screening requirements.*

**Response:** As shown on Exhibit 5, Sheet C1.10, all outdoor service areas will either face an interior area, side, or rear property line. This standard is not applicable.

2) *Screening of outdoor service areas. Screening shall be provided when an outdoor service area is adjacent to a property in residential use or adjacent to a residential zone. Screening shall also be provided to soften the effects of outdoor service areas as they may be viewed from a public street.*

a) *Outdoor service areas shall be screened either with evergreen hedge or solid fence of materials similar to the rest of the development that is a minimum of 6 feet in height.*

**Response:** Existing outdoor service areas located near the northwest corner of the main warehouse are not screened and are therefore non-conforming; however, the proposal will not increase the nonconformity beyond current conditions. Therefore, this standard does not apply.

b) *When the outdoor service area is more than 300 feet from a neighboring residence, screening is not required.*

**Response:** No screening is proposed for outdoor service areas more than 300 feet from a neighboring residence.

c) *Parking Areas. In addition to the requirements of Section 17.20.060, parking areas shall meet the requirements of Section 17.20.090.12.*

**Response:** The parking area screening requirements are addressed earlier in this report, demonstrating all applicable requirements are satisfied. This standard is met.

### 3. ARCHITECTURAL STANDARDS.

a. *Pedestrian Orientation. The design of all new buildings on a site shall support a safe pedestrian environment. This standard is met when the decision authority finds that all of the following criteria are met:*

- 1) *Primary building entrances shall have walkways connecting to the street sidewalk.*
- 2) *Any portion of an industrial building that is used for sales to the public shall meet the architectural standards of Section 17.20.200.4.*

**Response:** The applicant is not proposing a new building. This standard does not apply.

b. *Standards for breaks in building facade.*

- 1) *For all buildings more than 75 feet long:*
  - a) *A pitched roof building shall have a break in the roof plane or wall, or articulation of the building face at least every 50 feet.*
  - b) *A flat roof building shall have a horizontal or vertical change in the wall plane, or articulation of the building face at least every 50 feet.*
  - c) *Wall changes may be accomplished by use of differing architectural materials or building siding and need not be physical changes in the wall plane.*
  - d) *Horizontal and vertical offsets required by this Section shall relate to the overall design and organization of the building, its entrances, and door and window treatments. Features shall be designed to emphasize building entrances.*
  - e) *The above standards shall not apply to walls not visible from a public street or from neighboring residential properties within the city limits.*

**Response:** The existing building has a length in excess of 75 feet but does not meet these standards as it is a pre-existing nonconforming building. The proposed tenant improvements and site improvements do not afford the opportunity to change the wall plane, building articulation,

or façade materials. As a result, the building design will continue to be nonconforming. This standard does not apply.

4. *LIGHTING. All new industrial development shall provide a lighting plan that meets the standards of Section 17.20.170.*

**Response:** A lighting plan is included in Exhibit 5, Sheet C1.50. The standards of Section 17.20.170 are addressed in greater detail above, demonstrating the proposal satisfies the applicable requirements. This standard is met.

## **CHAPTER 17.26 TRANSPORTATION REQUIREMENTS**

### **17.26.020 Access Management Requirements and Standards**

1. *ACTIONS REQUIRING ACCESS PERMITS AND AUTHORITY TO GRANT ACCESS PERMITS.*

- a. *Projects Requiring Access Permits. Access permits are required for all projects requiring any type of permitting from the City of Stayton that result in additional trip generation or change in use. A change in use is defined as a change in tenant, a change in land use, an expansion of an existing use, or remodel of an existing use those results in increased traffic.*

**Response:** A Traffic Analysis Letter (TAL) is included in Exhibit 8, which demonstrates the proposal will result in the same or fewer vehicle trips than the historic usage of the site. As there is no increase in trip generation to the site, an access permit is not required for the existing site accesses because the subject site is not changing in use in such a way that “results in increased traffic.”

- b. *Access Permits onto City Streets. Permits for access onto city streets shall be subject to review and approval by the Public Works Director and/or his/her designee. The criteria for granting access permits shall be based on the standards contained in this section. The access permit may be granted in the form of a “City of Stayton access permit” or it may be attached to a land use decision notice as a condition of approval.*

**Response:** The subject site has existing access points on W Washington Street, which is a City street. As described in the TAL (Exhibit 8) and under Subsection 1.a., above, the proposal will not result in increased traffic, so no access permit is required.

- c. *State Highway Access Permits. Permits for access onto State highways shall be subject to review and approval by Oregon Department of Transportation (ODOT), except when ODOT has delegated this responsibility to the City of Stayton or Marion County. In that case, the City of Stayton and/or Marion County shall determine whether access is granted based on ODOT’s adopted standards.*

**Response:** The site is not located on a state highway. This standard does not apply.

- d. *Marion County Roadway Access Permits. Permits for access onto Marion County roadways shall be subject to review and approval by Marion County, except where the county has delegated this responsibility to the City of Stayton, in which case the City of Stayton shall determine whether access is granted based on adopted City of Stayton standards.*

**Response:** The site is not located on a roadway under Marion County jurisdiction. This standard does not apply.

- e. *Conditions of Approval with Granting of Access Permit. The City of Stayton or other agencies with access permit jurisdiction may require the closing or consolidation of*

*existing curb cuts or other vehicle access points, recording of reciprocal access easements (i.e. for shared driveways), development of a frontage street, installation of traffic control devices, and/or other mitigation as a condition of granting an access permit, to ensure the safe and efficient operation of the street system.*

**Response:** The proposal does not require an access permit; therefore, this standard does not apply.

*f. Non-Conforming Access Features. Legal access connections in place as of the effective date of this section that do not conform with the standards herein are considered nonconforming features and shall be brought into compliance with applicable standards under the following conditions:*

*1) Change in use as defined in 17.26.020.1.a.*

**Response:** As described in the TAL (Exhibit 8), the proposal does not include a change in use which “results in increased traffic,” as defined in Section 17.26.020.1.a.<sup>2</sup> This standard does not apply.

*2) When new access connection permits are requested or required.*

**Response:** No new access connection permits are requested or required. This standard does not apply.

*g. City’s Authority to Change Accesses. The City of Stayton has the authority to change accesses for all uses if it is constructing a capital improvement project along that section of the public street. The access changes shall meet all current standards. If it is not possible to change a particular access to meet all the current standards, then a non-conforming access shall be acceptable only if it improves the condition to more closely meet the current standards.*

**Response:** The applicant is not aware of any capital improvement projects along the frontages of the subject site on W Washington Street or N Evergreen Avenue. This standard does not apply.

## 2. NUMBER OF ALLOWED ACCESES.

*c. Number of Allowed Accesses for Non-Residential Uses. The number of driveways allowed for non-residential uses shall be based on the daily trip generation of the site in question. One driveway shall be allowed for up to 2,500 daily trips generated with a maximum of two driveways. An exception shall be allowed if it is proven through a traffic impact study that this limitation creates a significant traffic operations hardship for on-site traffic. The primary criteria to allow more driveways will be level of service (see standards in 17.26.050) analysis, queuing analysis, and safety analysis of the site accesses. If a development has a need for more than two access points, then signalization of the main access shall be investigated as a potential option prior to allowing additional driveways. A signal warrant study will then be required to study whether or not signalization of the main access is required. The Public Works Director or his/her designee shall determine whether the traffic study adequately proves that more accesses are needed for a particular project.*

**Response:** As shown on the site plan in Exhibit 5, Sheet C1.10, the subject site currently has one (1) driveway opening and five (5) gated access points along W Washington Street,

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<sup>2</sup> A change in use is defined as a change in tenant, a change in land use, an expansion of an existing use, or remodel of an existing use those results in increased traffic.

all of which are proposed to remain. The existing access points provide needed vehicular circulation for a mix of passenger vehicle and heavy truck traffic to accommodate multiple industrial tenants. Consolidating any of the existing accesses would degrade circulation into, out of, and through the site, which has a very long frontage and will experience a high volume of trucks which should be separated from passenger vehicles to maintain safety. While this configuration is non-conforming, the proposal will not increase the non-conformity. Therefore, this standard is not applicable.

3. *LOCATION OF ACCESSES. Vehicle access locations shall be provided based on the following criteria:*

- a. *Corner Lot Access. Corner lot driveways on local streets shall be a minimum of 50 feet from the intersecting property lines or in the case where this is impractical, the driveway shall be located 5 feet from the property line away from the intersection or as a joint use driveway at this property line. Corner lots on arterial or collector streets shall have driveways located on the minor cross street. If this is not feasible, then the corner lot driveway on an arterial or collector street must follow the minimum access spacing standard in Table 17.26.020.3.h. or in the case where this is impractical, the driveway shall be located 5 feet from the property line away from the intersection or as a joint use driveway at this property line.*

**Response:** The site is a corner lot since it has frontage on W Washington Street and N Evergreen Avenue. W Washington Street is designated as a minor arterial and N Evergreen Avenue is designated as a local street. No new accesses are proposed on either street. As the site has limited frontage on N Evergreen Avenue and extensive frontage on W Washington Street, the applicant proposes to maintain the existing driveway locations, all of which are at least 5 feet from the property line away from the intersection. Compliance with the spacing standards in Table 17.26.020.3.h is discussed below.

- c. *Access onto Lowest Functional Classification Roadway Requirement. Access shall be provided from the lowest functional classification roadway. If a tax lot has access to both an arterial and a lower classified roadway, then the arterial driveway shall be closed and access shall be granted along the lower functional classification roadway. This shall also apply for a series of non-residential contiguous tax lots under the same ownership or control of a development entity per the requirements set for in 17.26.020.5.a.5.*

**Response:** Due to the existing layout of buildings and access locations—which provide access not only to passenger vehicles but also to heavy trucks—the limited site frontage on N Evergreen Avenue (the lowest functional classification roadway) is not feasible to provide adequate vehicle circulation throughout the site. Therefore, the applicant proposes to maintain the existing driveway access locations.

- d. *Conditional Access Permits. Conditional access permits may be given to developments that cannot meet current access spacing and access management standards as long as other standards such as sight distance and other geometric standards can be met. In conjunction with the conditional access permit, crossover easements shall be provided on all compatible parcels without topography and land use conflicts. The conditional access permit shall allow temporary access until it is possible to consolidate and share access points in such a manner to either improve toward the current standards or to meet the current access spacing standards. Figure 17.26.020.3.d illustrates the concept of how the crossover easements eventually work toward meeting access spacing standards.*

**Response:** The subject site contains access points which do not meet current access spacing standards; however, this proposal will not increase non-conformance with current standards. There are no adjacent non-residential parcels with which access could be shared, so there is no opportunity to consolidate access points via crossover easements. This standard does not apply.

- e. *Shared Driveway Requirement for Adjacent Non-Residential Parcels with Non-Conforming Access(es).* Adjacent non-residential parcels with non-conforming access(es) shall be required to share driveways along arterial, minor arterial, and collector roadways pursuant to 17.26.020.1 which defines when the requirement is triggered. If the adjacent use refuses to allow for a shared driveway, then a conditional access permit may be given. As a condition of approval, cross-easements shall be granted to the adjacent non-residential parcel to secure a shared driveway later when the adjacent parcel redevelops, seeks to obtain an access permit, or becomes available.

**Response:** There are no adjacent non-residential parcels with which access could be shared. This standard does not apply.

- f. *Residential Subdivision Access Requirements.* Residential subdivisions fronting an arterial, minor arterial, or collector street shall be required to provide access from secondary local streets for access to individual lots. When secondary local streets cannot be constructed due to topographic or physical constraints, access shall be provided by consolidating driveways per the requirements set for in 17.26.020.3.d. In this situation, the residential subdivision shall still meet driveway spacing requirements of the arterial or collector street.

**Response:** No residential subdivision is proposed. This standard does not apply.

- g. *Phased Development Plans.* In the interest of promoting unified access and circulation systems, development sites under the same ownership or consolidated for the purposes of development and comprised of more than one building site shall be reviewed as a single property in relation to the access standards of this section. The number of access points permitted shall be as defined in 17.26.020.2.b. All necessary easement agreements and stipulations within the phased development shall be met to assure that all tenants within the development have adequate access. This shall also apply to phased development plans. All access to individual uses or buildings within a phased development must be internalized within the site plan using the shared circulation system of the principal development. Driveways shall be designed to avoid queuing across surrounding parking and driving aisles.

**Response:** No development phasing is proposed, and there are no abutting sites with which access points could be combined.

- h. *Access Spacing Standards*  
The streets within Stayton are classified as major arterials, minor arterials, collectors, neighborhood collectors, and local streets. The access spacing standards are shown in Table 17.26.020.3.h. for both full intersection spacing and driveway spacing. The access spacing standards shown in Table 17.26.020.3.h shall be measured as defined below.

- 1) Access spacing between two driveways on Neighborhood Collector, Local Residential, and Local Commercial/Industrial Streets shall be measured from the perpendicular near edge of the driveway to the perpendicular near edge of the driveway.

**Response:** Existing access points to the subject site is on W Washington Street, which is classified as a minor arterial according to City of Stayton Transportation System Plan. This standard does not apply.

2) *Access spacing between a driveway and an arterial, collector, or local street located on a Neighborhood Collector, Residential Local, or Commercial Local, or Industrial Local Street shall be measured from the perpendicular near edge of the driveway to the start of the tangent for the intersecting street.*

**Response:** Existing access points to the subject site are on W Washington Street, which is classified as a minor arterial according to City of Stayton Transportation System Plan. This standard does not apply.

3) *All other access spacing between driveways, between streets, and between streets and driveways shall be measured from center-to-center of the driveway or street.*

<b>TABLE 17.26.020.3.H. ACCESS SPACING STANDARD</b>		
<b>Functional Roadway Classification</b>	<b>Minimum Public Intersection Spacing Standard</b>	<b>Minimum Spacing between Driveways and/or Streets</b>
Major Arterial (Limited Access Facility) <sup>1</sup>	750 feet	375 feet
Major Arterial	260 feet	260 feet
Minor Arterial	260 feet	300 feet
Collector	260 feet	150 feet
Neighborhood Collector	260 feet	50 feet
Resident Local Street	260 feet	50 feet <sup>2</sup>
Commercial Local Street	260 feet	50 feet
Industrial Local Street	260 feet	50 feet
<sup>1</sup> This standard applies to on Cascade Highway north of Shaff Road and on S First Avenue south of Water Street.		
<sup>2</sup> This standard only applies to a corner residential lot driveway spacing from the adjacent street and may be modified per 17.26.020.3.a).		

**Response:** The subject site currently has one (1) driveway opening and five (5) gated access points along W Washington Street, which is classified as a minor arterial according to City of Stayton Transportation System Plan. The existing access points do not conform to the minimum spacing standards described above; however, this proposal will not cause the access points to become more non-conforming than current conditions.

i. *Highway 22 Terminal Ramps Control Zone*  
*This subsection adopts the 1999 Oregon Highway Plan for access management spacing standards for the Highway 22 interchange ramps at Golf Club Road and Cascade Highway. The proposed Golf Lane realignment in the Stayton Transportation System Plan shall also be considered as an allowed deviation to the control standards. All future development adjacent to the control zone around the on- and off-ramp intersections must comply with the standards set forth in OAR 734-051-0010 et seq.*

**Response:** The site does not have frontage on or near the Highway 22 interchange ramps. This standard does not apply.

- j. *Joint and Cross Access for Properties with Non-Conforming Access(es)*
- 1) *Adjacent non-residential uses shall provide a crossover easement drive and pedestrian access to allow circulation between sites.*
  - 2) *A system of joint use driveways and crossover easements shall be established wherever feasible.*
  - 3) *Pursuant to this section, property owners shall:*
    - a) *Record an easement with the deed allowing cross access to and from other properties served by the joint use driveways and cross access or service drive.*
    - b) *Record an agreement with the City of Stayton pre-existing driveways will be closed and eliminated after construction of the joint-use driveway.*
    - c) *Record a joint maintenance agreement with the deed defining maintenance responsibilities of property owners.*

**Response:** There are no adjacent non-residential parcels with which access could be shared, which precludes the opportunity to provide joint access or a crossover easement drive. This standard does not apply.

- k. *The City of Stayton may reduce required separation distance of access points defined in 17.26.020.3.h where they prove impractical as defined by the Public Works Director or his/her designee, provided all of the following requirements are met:*
- 1) *Joint access driveways and cross access easements are provided in accordance with this section.*
  - 2) *The site plan incorporates a unified access and circulation system in accordance with this section.*
  - 3) *The property owner enters into a written agreement with the City of Stayton, recorded with the deed, that pre-existing connections on the site will be closed and eliminated after construction of each side of the joint use driveway.*

**Response:** There are no adjacent non-residential parcels with which access could be shared, which precludes the opportunity to provide joint access or a crossover easement drive. Therefore, the type of unified access and circulation system and written agreement with the City of Stayton described in this section are not practicable. This standard does not apply.

- l. *The City of Stayton may modify or waive the requirements of this section where the characteristics or layout of abutting properties would make a development of a unified or shared access and circulation system impractical based on physical site characteristics that make meeting the access standards infeasible.*
- 1) *The application of the location of access standard will result in the degradation of operational and safety integrity of the transportation system.*

**Response:** There are no adjacent non-residential parcels with which access could be shared; therefore, it is not possible to develop a unified or shared access and circulation system as described in this section. Therefore, the applicant requests that the requirements of this section be waived by City staff since the proposed improvements due not generate additional trips (see Exhibit 8).

- 2) *The granting of the variance shall meet the purpose and intent of these regulations and shall not be considered until every feasible option for meeting access standards is explored.*

**Response:** The applicant is not seeking a variance. This standard does not apply.

- 3) *Applicants for variance from these standards must provide proof of unique or special conditions that make strict application of the provisions impractical. Applicants shall include proof that:*
- a) *Indirect or restricted access cannot be obtained;*
  - b) *No engineering or construction solutions can be applied to mitigate the condition; and*
  - c) *No alternative access is available from a road with a lower functional classification than the primary roadway.*

**Response:** The applicant is not seeking a variance. This standard does not apply.

- 4) *No variance shall be granted where such hardship is self-created.*

**Response:** The applicant is not seeking a variance. This standard does not apply.

4. ACCESS STANDARDS.

a. Driveway Design.

- 1) *See Standard Specifications for Public Works Construction, Section 300 – Street Design Standards, 2.22b for minimum and maximum driveway widths.*

**Response:** Per the driveway width table from the City of Stayton Public Works Design Standards, the minimum and maximum allowable driveway width in an industrial zone are 12 feet and 36 feet, respectively. It appears, based on measurements taken from the site survey, that five (5) of the six (6) driveways may exceed the maximum allowable width. As described earlier in this report, the applicant proposes to continue use of the existing access points to the subject site, which do not conform to all current standards; however, this proposal will not cause the access points to become more non-conforming than the existing conditions.

- 2) *Driveways providing access into off-street, surface parking lots shall be designed in such a manner to prevent vehicles from backing into the flow of traffic on the public street or to block on-site circulation. The driveway throat approaching the public street shall have adequate queue length for exiting vehicles to queue on-site without blocking on-site circulation of other vehicles. The driveway throat approaching the public street shall also have sufficient storage for entering traffic not to back into the flow of traffic onto the public street. A traffic impact study, subject to approval by the Public Works Director or his/her designee, shall be used to determine the adequate queue length of the driveway throat. This requirement shall be applied in conjunction with the design requirements of parking lots in section 17.20.060.9. If there is a conflict between these two code provisions, then this code provision supersedes those of 17.20.060.9.*

**Response:** Vehicle access and circulation through the subject site is depicted in Exhibit 5, Sheet C1.10. Existing driveways to the subject site provide adequate queue length for entering and exiting vehicles. The configuration of driveways and parking areas does not encourage vehicles to back into the flow of traffic on the street or within the site. As described in the Traffic Analysis Letter (TAL), Exhibit 8, this application does not require a full traffic impact study. This standard is met.

- 3) *Driveway approaches must be designed and located to provide an exiting vehicle with an unobstructed view. Sight distance triangle requirements are identified in 17.26.020.4.c and 17.26.020.4.d. Construction of driveways along acceleration lanes, deceleration lanes, or tapers shall be prohibited due to the potential for vehicular weaving conflicts unless there are no other alternatives for driveway*

locations. Only after a traffic impact study is conducted as defined in 17.26.050 and concludes that the driveway does not create a safety hazard along acceleration lanes, deceleration lanes, or taper shall the driveway be considered for approval. Approval of a driveway location along an acceleration lane, deceleration lane, or taper shall be based on the Public Works Director or his/her designee agreeing with the conclusions of the traffic impact study.

**Response:** The existing driveway approaches to the subject site are not located along acceleration lanes, deceleration lanes, or tapers. Sight distance requirements are addressed in the following sections of this report. This standard is met.

b. *Public Road Stopping Sight Distance*

Public roads shall have a minimum stopping sight distance requirement as summarized in Table 17.26.020.4.b. The minimum stopping sight distance is measured from a height of 3.5 feet to a target on the roadway nominally 6 inches in height.

<b>TABLE 17.26.020.4.B - STOPPING SIGHT DISTANCE REQUIREMENT</b>	
<i>Design Speed (mph)</i>	<i>Minimum Distance (feet)</i>
25	155
30	200
35	250
40	305
45	360
50	425

The minimum stopping sight distance is based on design speed of the roadway. Design speed of the roadway is defined in Standard Specifications for Public Works Construction, Section 300 – Street Design Standards, 2.08. If a design speed is not known, then the assumed design speed shall be at least 5 mph more than the posted speed or may be measured as the 90th percentile speed.

**Response:** The posted speeds for W Washington Street along the subject site are 25 mph and 35 mph. The design speeds, accordingly, are 35 mph and 45 mph. The minimum stopping sight distance (SSD) for the section with a 35-mph design speed is 250 feet, and the minimum stopping sight distance for the section with a 45 mph design speed is 360 feet. Sight distance at gated access points #1 and #2 on the west end of the site is limited to the west due to the horizontal curvature of W Washington Street; however, Mackenzie transportation engineers note that at minimum the SSD of 360 feet necessary for vehicles traveling eastbound along W Washington Street to come to a complete stop ahead of the western gated access points is met. The existing two (2) easternmost gated access points and one (1) driveway location offer adequate sight distance for vehicles to turn onto W Washington Street. The minimum required SSD to ensure a vehicle traveling on W Washington Street can safely stop ahead of a vehicle turning out of the two (2) westernmost gated access points is also available. Therefore, the existing driveway and gated access points are placed at safe locations and no changes are needed. This standard is met.

c. *Sight Distance Triangle*

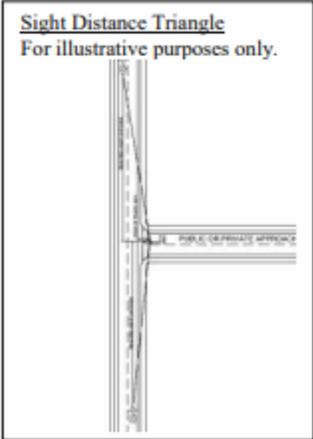
Traffic entering an uncontrolled public road from a stop sign controlled public road, or from private roads or private driveways, shall have minimum sight distances, as shown in Table 17.26.020.4.c, except as allowed in 17.26.020.4.d.

Requirements regarding sight distance in 8.04.060 shall also be met.

The sight distance triangle is based on design speed of the roadway. Design speed of the roadway is defined in Standard Specifications for Public Works Construction, Section 300 – Street Design Standards, 2.08. If a design speed is not known, then the assumed design speed shall be at least 5 mph more than the posted speed or may be measured as the 90th percentile speed.

The intersection and driveway sight distance is measured from an eye height of 3.5 feet above the controlled road at least 15 feet from the edge of the vehicle travel lane of the uncontrolled public road to an object height of 4.25 feet on the uncontrolled public road in accordance with the table below. This definition for measuring sight distance is consistent with AASHTO (American Association of State Highway and Transportation Officials) standards.

TABLE 17.26.020.4.C - INTERSECTION/DRIVEWAY SIGHT DISTANCE TRIANGLE REQUIREMENT	
Design Speed (mph)	Minimum Distance (feet)
25	155
30	200
35	250
40	305
45	360
50	425



**Response:** The posted speeds for W Washington Street along the subject site are 25 mph and 35 mph. The design speeds are 35 mph and 45mph, which require a minimum sight distance triangle of 250 feet and 360 feet, accordingly.

5. CONNECTIVITY AND CIRCULATION STANDARDS.

- a. Connectivity.
  - 1) The street system of proposed subdivisions shall be designed to connect with existing, proposed, and planned streets outside of the subdivision as specified in Section 17.24.050.1.a.

**Response:** No subdivision is proposed. This standard does not apply.

- 2) *Wherever a proposed development abuts unplatted, developable land or a future development phase of the same development, street stubs shall be provided to provide access to abutting properties or to logically extend the street system into the surrounding area. This is consistent with and an extension of Section 17.24.050.1.a.*

**Response:** The subject site does not abut unplatted, developable land or a future phase of the same development. This standard does not apply.

- 3) *Neighborhood collectors and local residential access streets shall connect with surrounding streets to permit the convenient movement of traffic between residential neighborhoods or facilitate emergency access and evacuation. Connections shall be designed to avoid or minimize through traffic on local streets. Appropriate design and traffic calming measures are the preferred means of discouraging through traffic.*

**Response:** No new street connections are proposed as part of this application. This standard does not apply.

- 4) *Developers shall construct roadways within their development site to conform to the Future Street Plan and Roadway Functional Classification Map in the Transportation System Plan. Flexibility of the future roadway alignment shall be at the discretion of the Public Works Director and/or his designee but must maintain the intent of the Future Street Plan.*

**Response:** No new roadways are proposed as part of this application. This standard does not apply.

- 5) *A system of joint use driveways and crossover easements shall be established wherever feasible and shall incorporate the following:*

- a) *A continuous service drive or crossover easement corridor extending the entire length of each block served to provide for driveway separation consistent with the access standards set for each functional roadway classification.*
- b) *A design speed of 10 mph and a maximum width defined in the Public Works Design Standards, to accommodate two-way travel aisles designated to accommodate automobiles, service vehicles, and loading vehicles;*
- c) *Access stub-outs and other design features to make it visually obvious that the abutting properties will be tied in to provide crossover easement via a service drive;*
- d) *A unified access and circulation system plan shall be submitted as part of the documentation for joint and cross access. A unified access and circulation system plan encompasses contiguous, adjacent parcels that share access(es). The unified access and circulation system plan shows how the joint and cross access(es) work together to meet the needs of all property owners and uses. It includes showing how parking areas of the various uses sharing access(es) coordinate and work with each other.*

**Response:** There are no adjacent non-residential parcels with which access could be shared, which precludes the development of a system of joint use driveways and crossover easements. This standard does not apply.

- 6) *New partitions and subdivisions shall provide safe bicycle and pedestrian connections to adjacent existing and planned residential areas, transit stops, and activity centers. Non-motorized connectivity can be provided through sidewalks, trails, and striped and/or signed bicycle facilities on local roadways.*

**Response:** This application does not involve a new partition or subdivision. This standard does not apply.

b. *Cul-de-sac and Accessways.*

- 1) *Cul-de-sacs or permanent dead-end streets may be used as part of a development plan only if topographical, environmental, or existing adjacent land use constraints make connecting and through streets infeasible. Where cul-de-sacs are planned, accessways shall be provided connecting the ends of cul-de-sacs to each other, to other streets, or to neighborhood activity centers unless topographical, environmental, or existing adjacent land use constraints make it infeasible.*

**Response:** No cul-de-sacs or permanent dead-end streets are proposed. This standard does not apply.

- 2) *Accessways for pedestrians and bicyclists shall be 10 feet wide and located within a 15-foot-wide right-of-way or easement. If the streets within the subdivision are lighted, the accessways shall also be lighted at residential/residential illumination standard. See Standard Specifications for Public Works Construction, Section 300 – Street Design Standards, 2.21, Street Lighting for actual specific street lighting standards. Stairs or switchback paths may be used where grades are steep. Any vegetation planted within the accessway shall be less than 30 inches in height and must not create a safety issue for pedestrians and bicyclists.*

**Response:** No pedestrian or bicycle accessways are proposed. This standard does not apply.

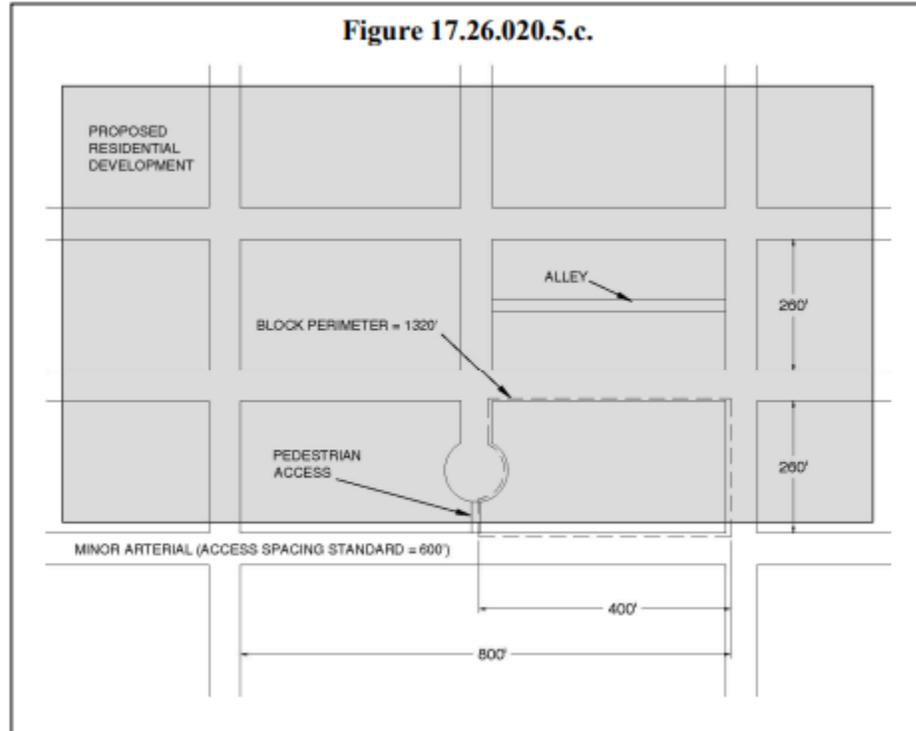
c. *Street Connectivity and Formation of Blocks (Block Length and Perimeter Standard).*

*In order to promote efficient vehicular and pedestrian circulation throughout the city, subdivisions and site development shall be served by a connecting network of public streets and/or accessways, in accordance with the following standards (minimum and maximum distances between two streets or a street and its nearest accessway measured from right-of-way line to right-of-way line as shown in Figure 17.26.020.5.c.*

- 1) *Residential Districts. Minimum 100-foot block length and maximum of 600-foot length; maximum 1,400 feet block perimeter;*
- 2) *Downtown/Main Streets. Minimum 100-foot block length and maximum of 400-foot length; maximum 1,200 feet block perimeter;*
- 3) *General Commercial Districts. Minimum 100-foot block length and maximum of 600-foot length; maximum 1,400 feet block perimeter;*
- 4) *Industrial Districts. Not applicable*

*If a hardship can be demonstrated in which it is not practically feasible to meet these standards due to topographical, environmental, or other significant constraints, then these conditions may be requested to be modified through the Public Works Director or his/her designee. At no time shall any block length be greater than 600 feet and its maximum block perimeter 1,800 feet for roadways with urbanized area principal arterials, minor arterials, or lower classification.*

Alleys as defined in the City's Street Design Standards may be used within residential subdivisions but cannot be used in the maximum block perimeter calculation. The maximum alley length is 600 feet between ties to public streets. Midblock access(s) to alleys must align with existing or planned public streets.



**Response:** The site is in an industrial district so per criterion (4), this standard is not applicable.

6. **DEVELOPMENT REVIEW PROCEDURE FOR ACCESS MANAGEMENT.**

a. Applicants for Development Reviews impacting access shall submit a preliminary site plan that shows:

1) Location of existing and proposed access point(s) on both sides of the roadway for a distance equal to the spacing standard for that facility;

**Response:** The location of existing access points is included in Exhibit 5, Sheets C1.00 and C1.10. No new access points are proposed. This standard is met.

2) Distances from proposed access point to neighboring constructed access points, median openings (where applicable), traffic signals (where applicable), intersections, and other transportation features on both sides of the property; Number and direction of lanes to be constructed on the driveway plus striping plans;

**Response:** No new access points are proposed as part of this application. This standard does not apply.

3) All planned transportation features (such as sidewalks, bikeways, signs, signals, etc.);

**Response:** No new transportation features are proposed as part of this application. This standard does not apply.

b. Development Reviews shall address the following access criteria:

- 1) *Access shall be properly placed in relation to sight distance, driveway spacing, and other related considerations, including opportunities for joint and cross access.*

**Response:** As described earlier in this report, the applicant proposes to continue use of the existing access points to the subject site, which do not conform to all current standards; however, this proposal will not cause the access points to become more non-conforming than the existing conditions.

- 2) *The external road system to the project site and internal road system within the project site shall provide adequate access to buildings for residents, visitors, deliveries, emergency vehicles, and garbage collection.*

**Response:** The subject site is a developed industrial site and was designed to accommodate passenger vehicles, emergency vehicles, and heavy truck traffic. Proposed site improvements are limited to providing additional off-street parking and loading areas, which have also been designed to provide adequate access for these vehicle types. This standard is met.

- 3) *The access shall be consistent with the access management standards adopted in the Transportation System Plan and contained within 17.26.010.*

**Response:** It appears, based on measurements taken from the site survey, that the three (3) gated access points at the west end of the site and the driveway and gated access point at the east end of the site do not meet the minimum 300-foot spacing requirement. As described earlier in this report, the applicant proposes to continue use of the existing access points to the subject site, which do not conform to all current standards.; however, this proposal will not cause the access points to become more non-conforming than the existing conditions.

- c. *Any application that involves access to the State Highway System shall be reviewed by the Oregon Department of Transportation for conformance with state access management standards. Any application that involves access to Marion County's roadway system shall be reviewed by City of Stayton staff for conformance with City of Stayton access management standards.*

**Response:** The site is not located on a state highway or on a roadway under Marion County jurisdiction. This standard does not apply.

#### **17.26.030 Bicycle Parking And Bicycle Circulation and Access**

#### **4. SITE PLANS**

*Required elements for a site plan shall include the design and location of bicycle and pedestrian circulation elements such as accessways, walkways, and transit facilities.*

- a. *All site plans shall clearly show how the site's internal pedestrian and bicycle facilities connect with external existing or planned facilities or systems.*

**Response:** The primary pedestrian access to the site is an existing crosswalk near the center of the site's frontage on W Washington Street (see Sheet C1.10 of Exhibit 5). No new bicycle facilities, accessways, walkways, or transit facilities are proposed.

- b. *All site plans shall construct pedestrian facilities as identified on the city's trails map.*

**Response:** Neither the 2005 Parks and Recreation Master Plan nor the 2019 Transportation System Plan depict any existing or proposed trails within or abutting the site. The Parks and Recreation Master Plan does indicate that the City has a long-term plan to construct a linear park along Salem Ditch at some point in the future. This standard does not apply.

- c. *Preliminary subdivision plans and final plats shall show the location and design of all proposed pedestrian and bicycle facilities, including accessways.*

**Response:** This application does not involve a subdivision. This standard does not apply.

5. **BICYCLE CIRCULATION AND ACCESS**

*Bicycle circulation and access requirements as it relates to cul-de-sacs and accessways are contained in Section 17.26.020.5.b.*

**Response:** No cul-de-sacs or accessways are included as part of this application. This standard does not apply.

**17.26.050 Transportation Impact Analysis Requirements**

1. *When a Transportation Impact Analysis is Required. A TIA shall be required when:*

- a. *The development generates 25 or more peak-hour trips or 250 or more daily trips.*
- b. *An access spacing exception is required for the site access driveway(s) and the development generates 10 or more peak-hour trips or 100 or more daily trips.*
- c. *The development is expected to impact intersections that are currently operating at the upper limits of the acceptable range of level of service during the peak operating hour.*
- d. *The development is expected to significantly impact adjacent roadways and intersections that have previously been identified as high crash locations or areas that contain a high concentration of pedestrians or bicyclists such as school*

**Response:** Based on the trip generation estimates presented in the Transportation Assessment Letter (TAL), Exhibit 8, the proposal is not expected to meet the City's 10 peak hour trip or 100 daily trip threshold. In fact, the proposal is expected to generate the same or fewer trips than the existing use. Therefore, a TIA is not required based on trip generation estimates or impacts to intersections or roadways currently performing under the City's mobility standards or identified as areas of concern due to high crashes or concentration of pedestrians or bicyclists.

2. *When a Transportation Assessment Letter is Required. If a TIA is not required, the applicant's traffic engineer shall submit a transportation assessment letter to the City indicating the proposed land use action is exempt. This letter shall outline the trip-generating characteristics of the proposed land use and verify that the site-access driveways or roadways meet City of Stayton sight-distance requirements and roadway design standards.*

*The Public Works Director may waive the requirement for a transportation assessment letter if a clear finding can be made that the proposed land use action does not generate 25 or more peak-hour trips or 250 or more daily trips and the existing and or proposed driveway(s) meet the City's sight-distance requirements and access spacing standards.*

**Response:** A Transportation Assessment Letter (TAL) is included in Exhibit 8. This standard is met.

8. *Trip Generation for the Proposed Development. To determine the impacts of a proposed development on the surrounding transportation network, the trip-generating characteristics of that development must be estimated. Trip-generating characteristics should be obtained from one of the following acceptable sources:*

- a. *Institute of Transportation Engineers (ITE) Trip Generation Manual (latest edition).*
- b. *Specific trip generation studies that have been conducted for the particular land use action for the purposes of estimating peak-hour trip-generating characteristics. The Public Works Director (or his/her designee) should approve the use of these studies prior to their inclusion in the transportation impact analysis.*

- c. *In addition to new site-generated trips, several land uses typically generate additional trips that are not added to the adjacent traffic network. These trips include pass-by trips and internal trips and are considered to be separate from the total number of new trips generated by the proposed development. The procedures listed in the most recent version of the Trip Generation Handbook (ITE) should be used to account for pass-by and internal trips.*

**Response:** Trip generation estimates for the proposal are detailed in the Transportation Assessment Letter (TAL), Exhibit 8, which demonstrates the proposal is anticipated to result in no increase in trips compared to the existing use. This standard is met.

- 12. *Conditions of Approval. As part of every land use action, the City of Stayton, Marion County (if access to a County roadway is proposed), and ODOT (if access to a state roadway is proposed) will be required to identify conditions of approval needed to meet operations and safety standards and provide the necessary right-of-way and improvements to develop the future planned transportation system. Conditions of Approval that should be evaluated as part of subdivision and site plan reviews include:*

- a. *Crossover easement agreements for all adjoining parcels to facilitate future access between parcels.*

**Response:** Crossover easement agreements are not feasible for the subject site because it is not adjacent to any other non-residential site. This condition does not apply.

- b. *Conditional access permits for new developments which have proposed access points that do not meet the designated access spacing policy and/or have the ability to align with opposing access driveways.*

**Response:** No new access points are proposed as part of this application. This condition does not apply.

- c. *Right-of-way dedications for future planned roadway improvements.*

**Response:** As described in the TAL, Exhibit 8, the proposal will result in no increase in vehicle trips. Therefore, right-of-way dedications would be significantly disproportionate to the impact of the proposal. This condition does not apply.

- d. *Half-street improvements along site frontages that do not have full-buildout improvements in place at the time of development.*

**Response:** As described in the TAL, Exhibit 8, the proposal will result in no increase in vehicle trips. Therefore, half-street improvements would be significantly disproportionate to the impact of the proposal. This condition does not apply.

#### **IV. CONCLUSION**

Based on the information presented and discussed in this narrative and the attached supporting plans and documentation, this application meets applicable standards and guidelines necessary for land use approval. The proposed site improvements comply with all applicable standards of the City of Stayton's Land Use and Development Code, and the applicant respectfully requests that the City approve the proposed site plan review.