



Stayton Site Plan Review Narrative

For a

Proposed Office and Storage Facility

Stayton ,OR

Prepared for
Lunski Properties, LLC

January, 2026

Project Information

- **Purpose of Application:**

The Applicant is requesting approval for a Design Review application for a proposed ice storage and office facility on property described below.

- **Subject of Application**

P.P. 1998-004, Parcel 2, Tax Lot #091W09DA01103, 1319 W Washington St, Stayton, OR, 97383

- **Zoning:**

Current Zoning – City of Stayton · Light Industrial (IL)

- **Property Owner:**

LUNSKI PROPERTIES LLC -17823 S Nestle Lane, Oregon City, OR, 97045

- **Applicant:**

Scott Lunski – Santiam Ice Co. – 192 N Santiam Highway SE, Idanha, OR 97350
Contact Information: Scott@SantiamIce.com 503-969-4059

- **Applicant's Authorized Representatives:**

Project Delivery Group, LLC – 2508 Ina Avenue Cody, WY 82414

- Contact: Keith Whisenhunt, PE, PLS ▪ (503) 364-4004 ▪ keithw@pdgnw.com

BACKGROUND & REQUEST:

Context: The subject property is located east of Miller Dr and north of the former Norpac Cannery site in Stayton, Marion County, Oregon. The property is identified as P.P. 1998-004, Parcel 2, Tax Lot #091W09DA01103- 1319 W Washington St. Stayton, OR, 97383. The graphic below shows the property with the current approved property boundary.



Figure 1: Aerial Tax Map

As shown on the following zoning map, the property is currently zoned IC – Industrial Commercial in the City of Stayton (see Figure #2). The property is the site of proposed office and storage buildings for Santiam Ice Company, a company that produces and distributes ice in the Willamette Valley. The property is within the boundaries of the Santiam Water Control District and Stayton Rural Fire Protection District.

Current Request: The property is currently comprised of one lot which is approximately 0.51 acres in size. Figure three shows the boundaries of the property on the Marion County Tax Assessor’s map (see Figure #3).

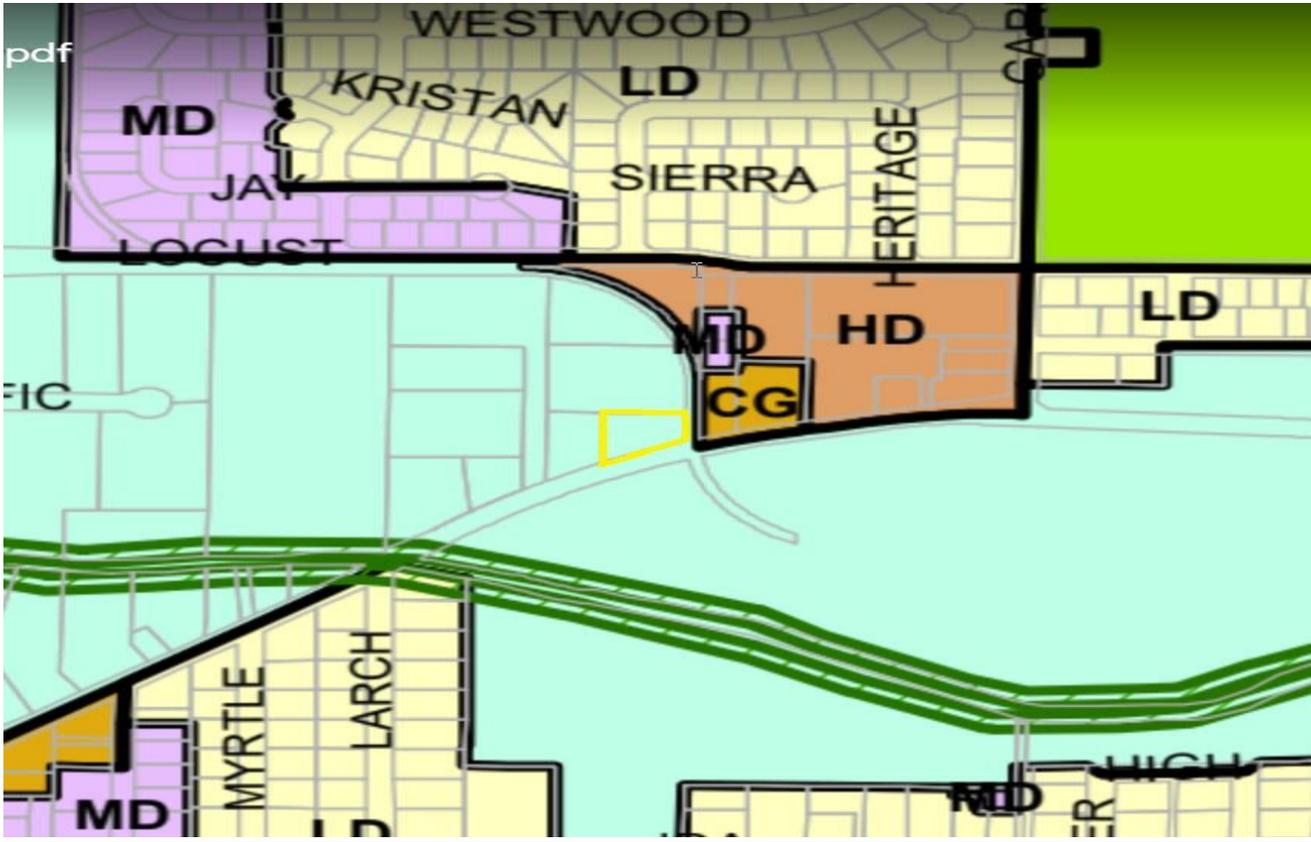


Figure 2: City of Stavton Zoning Map

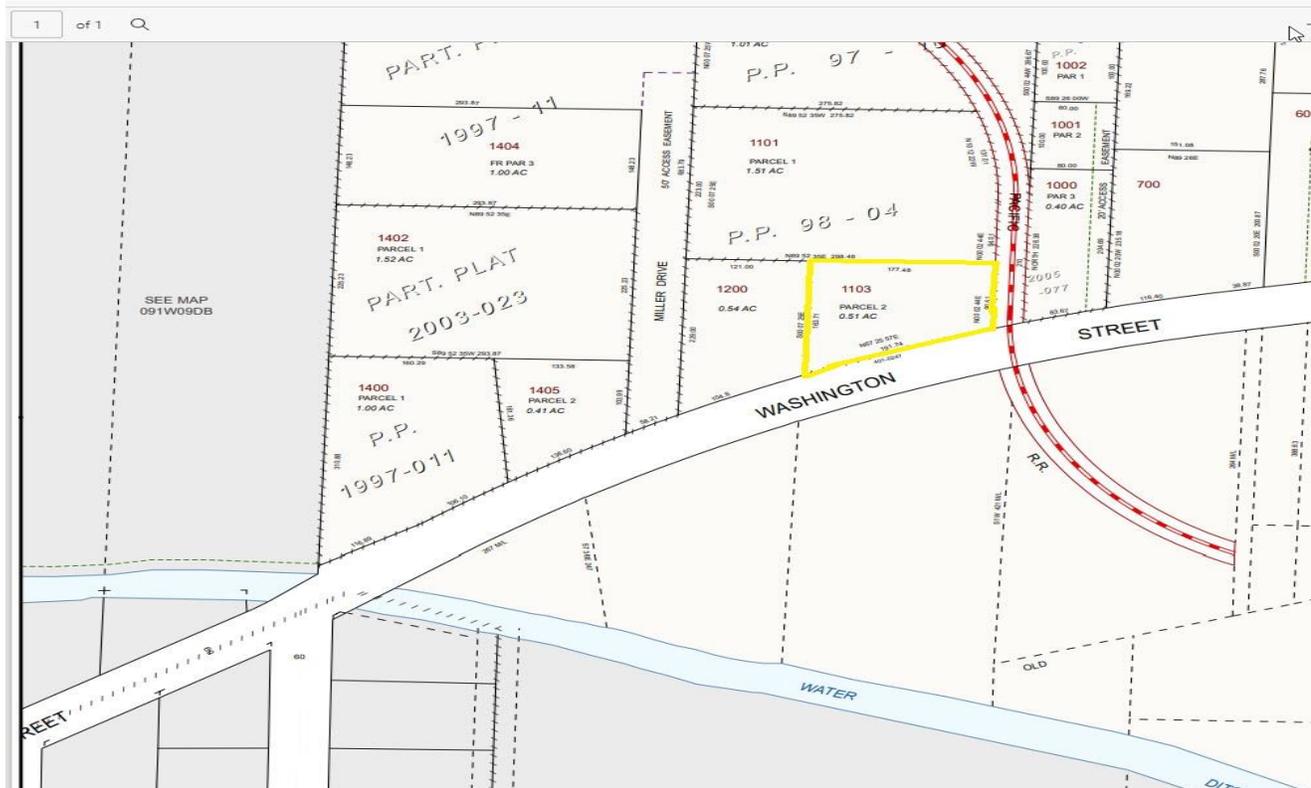


Figure 3 – Marion County Tax Map

COMPLIANCE WITH CITY OF STAYTON DEVELOPMENT CODE:

Purpose of Application: The purpose of this Design Review Application is to provide for the construction of a small office building and a storage facility on the property. The following is the Applicant's response to the applicable standards and sections of the Stayton Land Use Development Code:

17.12.220 SITE PLAN REVIEW

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.
 - 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: (Ord. 898, August 20, 2007; Amended Ord. 1032, June 19, 2019)
 - 1) The name of the person who prepared the plan.
 - 2) A north point, graphic scale, and date of the proposed site plan.
 - 3) Topography of the site with contour intervals of not more than 2 feet.
 - 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.
 - 5) The tax map number (township, range and section) and lot number of all properties included in the proposed site plan.
 - 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.
 - 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.
 - 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.
 - 9) A preliminary storm water management plan for the development, prepared in accordance with the Public Works Design Standards. (Amended Ord. 1032, June 19, 2019)
 - 10) The locations of proposed sewer disposal and water supply systems in accordance with the City's Wastewater and Water Master Plans.
 - 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.
 - 12) A landscaping plan prepared in accordance with Section 17.20.090.3
 - 13) The location of parking facilities for the site including any parking areas shared with adjacent uses by reciprocal access agreement.
 - 14) A Traffic Impact Analysis (TIA) or Transportation Assessment Letter as required by Section 17.26.050
 - 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. (Amended Ord. 913, September 2, 2009; Amended Ord. 1032, June 19, 2019)
 - 16) The location and dimensions of open storage areas or outdoor storage yards.
 - 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.
 - 18) The location of any free standing signage and the proposed size(s) and dimension(s).

- 19) The location of any proposed screening including fences, walls, hedges and berms.
 - 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 a narrative statement fully explaining the request and fully addressing the criteria for approval of site plan review.
- c. A narrative statement fully explaining the request and fully addressing the criteria for approval of the site plan review.

RESPONSE: The Applicant has submitted all required materials as outlined above.

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. (Amended Ord. 913, September 2, 2009; Amended Ord. 1032, June 19, 2019)
 - 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. (Ord. 898, August 20, 2007; Amended Ord. 1032, June 19, 2019; Amended Ord. 1034, July 17, 2019)
 - 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. (Amended Ord. 1032, June 19, 2019; Amended Ord. 1034, July 17, 2019)
 - d. Provision has been made for parking and loading facilities as required by Section 17.20.060.
 - e. Open storage areas or outdoor storage yards shall meet the standards of Section 17.20.070.
 - f. Site design shall minimize off site impacts of noise, odors, fumes or impacts.
 - 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
 - h. (Repealed Ord. 913, September 2, 2009)
 - i. (Repealed Ord. 913, September 2, 2009)
 - 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. (Ord. 898, August 20, 2007)
 - 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.

- l. The lighting plan satisfies the requirements of Section 17.20.170.
- m. The applicant has established continuing provisions for maintenance and upkeep of all improvements and facilities.
- 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. (Added Ord. 949, April 17, 2013)
- 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. (Added Ord. 1032, June 19, 2019)

17.16- ZONING

INDUSTRIAL COMMERCIAL. To provide for a mixing of light industrial activities and service related commercial activities in a specific area to reduce conflicts between industrial and general commercial uses.

RESPONSE: the Applicant’s proposed use falls under “Miscellaneous Manufacturing” and is permitted subject to Site Plan Review for new construction.

17.16.070 – DISTRICT REGULATIONS:

MINIMUM LOT DIMENSIONS:

Table 17.16.070.2 Minimum Dimensional Requirements for Lots

	LD	MD	HD	DMD	CR	CG	ID	CP	CCM U	DCM U	DRM U	IC	IL	IA	P
Lot Area (square feet) ¹	8,000	7,000	6,000	7,000	0	0	0	0	0	0	0	0	0	5 acres	0
Lot Width (feet)	80	70	60	40	0	0	0	0	0	0	0	0	0	0	0
Average Width (feet)	80	70	60	40	0	0	0	0	0	0	0	0	0	0	0

RESPONSE: Property within the IC zone does not require any minimum lot dimensions. This requirement has been met.

DIMESIONS CRITERIA FOR STRUCTURES:

Table 17.16.070.3 Dimensional Requirements for Structures

	LD	MD	HD	DMD	CR	CG	ID	CP	CCM U	DCM U	DRM U	IC	IL	IA	P
Front Yard Setback (feet) ¹	2 ⁰²	20 ²	20 ²	-- ⁸	0	0	0	0	-- ⁸	-- ⁸	-- ⁸	0	0	0	0
Side Yard Setback (feet)	5	5	5	-- ⁸	03	03	0 ³	0 ⁴	-- ⁸	-- ⁸	-- ⁸	0 ⁴	0 ⁴	0	0 ³
Rear Yard Setback (feet)	20	15	15	-- ⁸	03	03	0 ³	0 ⁴	-- ⁸	-- ⁸	-- ⁸	0 ⁴	0 ³	0	0 ³
Building Height (feet)	5	35 ⁶	35 ⁶	-- ⁴	-- ⁸	60 ⁷	60 ⁷	60 ⁷	-- ⁴	-- ⁸	-- ⁸	-- ⁴	-- ⁴	-- ⁴	60 ⁷

RESPONSE There are no setback requirements for the proposed use.

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 fences are proposed.

- 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: No new fences are proposed.

17.20.060 OFF-STREET PARKING AND LOADING

- 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.

Table 17.20.060.7.b Commercial and Industrial Parking Requirements:

- Shop/Repair and Maintenance Facility – 2 spaces / 1,000 s.f.
- Office – 3.5 / 1000 s.f.

RESPONSE: Following are the calculations used to determine the number of spaces required to reach use and show on the Applicant’s site Plan:

- Shop / Repair and Maintenance Facility: : 2,000 sf / 1,000 sf x 2 spaces per 1,000 sf = 4 spaces required.
- Office : 600 sf / 1,000 sf x 3.5 spaces per 1,000 = 2.1 spaces required – 2 spaces required.

Seven spaces have been provided. The parking requirements have been met.

8. REQUIREMENTS FOR HANDICAPPED AUTOMOBILE 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:

RESPONSE: One handicapped space has been provided per the requirements in Table 17.20.060.8.a (see Preliminary Site Plan).

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.
 - 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: (Amended Ord. 902, May 7, 2008, Amended Ord. 930, November 18, 2010)

Table 17.20.060.9.a Minimum Loading Bay Requirements

Square Feet (gross floor area)	Number of Bays
5,001 to 40,000	1
40,001 to 70,000	2
70,001 to 100,000	3
100,001 to 140,000	4

RESPONSE: The proposed shop area is 2,000 square feet. Since the total square feet is under 5,000, this requirement does not apply. The proposed office is 1,200 square feet. Since the office is under 600 square feet this requirement also does not apply.

9-A. BICYCLE PARKING REQUIREMENTS

- i. 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.

Table 17.20.060.9-A.1 Bicycle Parking Requirements:

Land Use Category	Min. Required Bicycle Parking Spaces
Office	1 Space / 1000 s.f.
Storage	TBD by Planning Commission

RESPONSE: The applicant has provided A bicycle parking rack adjacent the proposed office building. The number of required bicycle parking spaces for the proposed shop will be decided by the Planning Commission.

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 applicant will discuss how our application meets the Commercial Design Standards of this section later in this narrative.

- 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: The Applicant's Preliminary site plan shows the proposed parking area that serves the proposed office building as asphalt pavement. The Applicants Preliminary Grading Plan shows how both the parking and gravel storage areas drain to their respective infiltration basins and no drainage crosses any public facilities. The parking area adjacent to the proposed office is striped to identify individual parking spaces. This requirement has been 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 applicant has provided a 30' wide concrete apron approach off West Washington Street to access the proposed development. This requirement has been met.

- 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: The driveway connection is placed at the location directed by City staff. While this driveway connection does not comply with the spacing requirements, the location of the proposed entrance is the only logical choice as it aligns with the industrial use across west Washington Street. There is an active rail line approximately 85 feet to the east. Given the geometry of the parcel and the proposed uses thereon, it would not make good planning sense to locate the entrance at any other location.

- 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 Site Plan provides for vehicular circulation complying with the stated requirements.

- 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 proposed development is in an industrially zoned area. This criterion does not apply.

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

RESPONSE: Parking lot and building lighting will be addressed in Section 17.20.170 – Outdoor Lighting later in this narrative.

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. (Amended Ord. 913, September 2, 2009)
 - a. Perimeter Landscaping. All parking areas shall be landscaped along the property boundaries as required by 17.20.090.11 (Amended Ord. 913, September 2, 2009)

RESPONSE: All property boundaries are or will be landscaped upon acceptance of this proposed development in accordance with this section (see Planting Plan). This requirement has been met.

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

RESPONSE: This criterion does not apply as there are less than 20 parking spaces proposed for this development.

- 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.
 - 2) All pedestrian walkways constructed within parking lots areas be raised to standard sidewalk height. (Amended Ord. 913, September 2, 2009)
 - 3) Pedestrian walkways shall be attractive and include landscaping and trees.

RESPONSE: The applicant's site plan shows the location of pedestrian walkways connecting the parking area and the building.

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: No open or outdoor storage is proposed.

- 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: No open or outdoor storage is proposed.

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: No open or outdoor storage is proposed.

- 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: No open or outdoor storage is proposed.

- 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: No open or outdoor storage is proposed.

- 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: No open or outdoor storage is proposed.

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: Both proposed buildings are set back at least 50 feet from the Washington St right of way. This requirement is met.

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: Table 17.20.090.2-Minimum landscape percentage- Light Industrial, lots 2.0ac in area or less- 15%

RESPONSE: The total landscaped area on this proposed site is 19.8%, which exceeds the required 15%. This requirement 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.
- 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.
- c. The location and size of the plant species, identified by common and botanical names, and expected size within 5 growing seasons.
- 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.
- 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.
- 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: The Applicant has provided a Preliminary Planting Plan addressing these criteria included in this Application.

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.
 - i. 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.
 - ii. 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.
 - iii. 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.
 - iv. 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.

- v. 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.
- vi. All areas not occupied by parking lots, paved roadways, walkways, patios, or building shall be landscaped.
- vii. All landscaping shall be continually maintained, including necessary watering, pruning, weeding, and replacing.

RESPONSE: The Applicant has provided a Preliminary Planting Plan addressing these criteria included in this Application.

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: As shown on the Preliminary Planting Plan, trees will be planted along the Washington Street frontage that abuts the subject property.

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: The Irrigation Plan will incorporate provisions for conservation of water including drip irrigation where appropriate. High water demand areas will be separated from area requiring less frequent irrigation.

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. (Amended Ord. 913, September 2, 2009)
 - b. Use of native plant materials or plants acclimated to the Pacific Northwest is encouraged to conserve water during irrigation.

- 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.
- 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.
- e. Coniferous trees shall be a minimum 5 feet in height above ground at time of planting.
- f. Shrubs shall be a minimum of 2 feet in height when measured immediately after planting.
- 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.
- i. 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. 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.
- 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.
- 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.
- l. Artificial plants are prohibited in any required landscaped area.

RESPONSE: As shown on the Preliminary Planting Plan, the west, north, and east property lines will be planted with a combination of decorative trees, shrubs, and groundcover. The south property line abutting Washington Street includes the proposed infiltration basins and will be planted with a combination of water-tolerant grasses, shrubs, and trees. The trees planted along west Washington Street have been discussed previously in this application narrative.

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: The parking strip adjacent to west Washington Street will be landscaped in accordance with city code requirements (with discretionary approval of the Public Works Director). This area has not been included in the overall landscape area calculations.

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:

- i. 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

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

- ii. 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: The Preliminary Planting Plan provides plant material to meet this requirement.

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 Applicant’s Preliminary Planting Plan shows the proposed landscape buffers.

17.20.140 SIGNS

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:
 - i. Total Allowed Area. The total allowed sign area of all signs for a business not in an integrated business center is two square feet of for each lineal foot of building frontage up to a maximum of 100 square feet.

RESPONSE: The proposed sign will meet this requirement.

- ii. Type, Maximum Number, and Size of Signs. Within the total allowed signage area, one free-standing sign for each street frontage, and one wall, canopy or projecting sign is permitted. A free-standing sign shall be limited to a maximum of 50% of the total allowed sign area. (Amended Ord. 985, September 14, 2015)

RESPONSE: The proposed sign will meet this requirement.

- iii. Maximum Sign Height.
 1. Wall or wall mounted signs shall not project above the parapet or roof eaves.
 2. 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.

RESPONSE: The proposed sign will meet this requirement.

- iv. Location.
 1. Wall or canopy signs may project up to 1.5 feet from the building.
 2. 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 canopy or projecting sign that projects over a street right-of-way shall be at least 8 feet above ground level. (Amended Ord. 985, September 14, 2015)
 3. Monument signs shall not project over street rights-of-way and they shall not be located within a sight clearance triangle or special street setback. 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 proposed sign will meet this requirement.

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: The applicant has submitted an Existing conditions Plan. Trees slated for removal are shown.

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: Street trees will be planted in the parking strip adjacent West Washington Street and will be maintained by the Applicant.

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: There are no Heritage Trees identified on the property.

17.20.170 OUTDOOR LIGHTING

4. NON-RESIDENTIAL LIGHTING STANDARDS. The following additional standards shall apply to all commercial, industrial, public and semi-public uses:
 - 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. (Amended Ord. 913, September 2, 2009)
 - 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. (Amended Ord. 913, September 2, 2009)
 - a) If such fixtures are not cut-off fixtures, the maximum initial lumens generated by each fixture shall not exceed 2,000 (equivalent to a 150-watt incandescent bulb).
 - b) Mounting heights of such alternative fixtures shall not exceed 15 feet.
 - 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 application package includes information showing compliance with the requirements above.

- 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.
 - 1) In addition to the application materials required as part of the lighting plan, applications for security lighting installations shall include a written description of the need for a purposes of the security lighting, a site plan showing the area to be secured and the location of all security lighting fixtures, specifications of all fixtures, the horizontal and vertical angles in which light will be directed, and adequate cross-sections showing how light will be directed only onto the area to be secured.
 - 2) All security lighting fixtures shall be shielded and aimed so that illumination is directed only to the designated area and not cast on other areas. In no case shall lighting be directed above a horizontal plane through the top of the lighting fixture, and the fixture shall include shields that prevent the light source or lens from being visible from adjacent properties and roadways. The use of general floodlighting fixtures is discouraged unless the above standards can be met.
 - 3) Security lighting may illuminate vertical surfaces (e.g. building facades and walls) up to a level 8 feet above grade or 8 feet above the bottoms of doorways or entries, whichever is greater.
 - 4) Security lighting fixtures may be mounted on poles located no more than 10 feet from the perimeter of the designated secure area.
 - 5) Security lights intended to illuminate a perimeter (such as a fence line) shall include motion sensors and be designed to be off unless triggered by an intruder located within 5 feet of the perimeter.
 - 6) Security lighting shall meet the standards of the table below:

Table 17.20.170.4.d.6 Security area lighting standards

Feature	Commercial Zones	Downtown Zones	Industrial Zones
Maximum Mounting Height	20 feet	14 feet	25 feet
Maximum Average Horizontal Illumination Level on Ground	1.0 foot-candle	1.0 foot-candle	1.5 foot-candle

Maximum Average Illumination Level on Vertical Surface	1.0 foot-candle	1.0 foot-candle	1.5 foot-candle
Minimum Color Rendering Index	65	65	20

RESPONSE: The application package includes information showing compliance with the requirements above.

17.20.230 INDUSTRIAL DESIGN STANDARDS (Added Ord. 908, May 6, 2009)

1. **PURPOSE.** The purpose of the industrial design standards is to provide for originality, flexibility, and innovation in site planning and development in the Industrial Zones while maintaining a standard that improves the appearance of the zones and protects neighboring residential properties from the potential impacts of industrial development. The standards of this section apply to all new construction, additions and exterior alterations in the Industrial Zones.

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 multi-story 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: There are two residential dwellings located to the west within 300 feet of the subject property. These dwellings appear to be non-conforming uses and located within the Light Industrial District; therefore this requirement 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: There is a “storage area” located in front of the proposed shop. The closest portion of the building is 62-feet from the Washington Street right-of-way. The storage area sits behind the site’s infiltration basin which varies in size from 12-feet to 40-feet. Combined with a 4-foot buffer in front of a 6-foot cyclone fence, this provides ample area in which to effectively screen the proposed use. The Applicant requests the Planning Director’s concurrence with the placement of this use.

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.
- b. When the outdoor service area is more than 300 feet from a neighboring residence, screening is not required.
- 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 outdoor storage area will, occasionally, accommodate some of the vehicles of firefighters who are on assignment. As stated previously, the proposed infiltration basin in conjunction with a 6-foot cyclone fence and 4-foot landscape buffer provides more than adequate screening of the proposed use from West Washington Street. The requirements of Section 17.20.060 are met (see Preliminary Landscape Plan).

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.

RESPONSE: All proposed building entrances 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: This criterion 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.

RESPONSE: Based on building dimensions and placement, these criteria are met.

- e) The above standards shall not apply to walls not visible from a public street or from neighboring residential properties within the city limits.
4. LIGHTING. All new industrial development shall provide a lighting plan that meets the standards of Section 17.20.170.

RESPONSE: A lighting plan meeting the applicable requirements is included in the application package.

QUESTIONS TO BE ADDRESSED IN NARRATIVE STATEMENT:

The Stayton Planning Commission, with assistance from the Planning Department and the Public Works Department will use the information provided by the applicant to analyze the merits of this application. A decision to approve or deny the application is made based on how well the applicant presents information to show the application meets the standards and criteria set forth in the Stayton Land Use and Development Code 17.12.220.5. Please provide the following information in full and attaché to this application.

1. ADEQUATE UTILITIES: How will the development obtain or maintain adequate utility systems (including water, sewer, surface water drainage, power, and communications), and connections, including easements, to properly serve the subject property in accordance with accepted City standards?

Applicant's Response: As shown on the Existing Conditions Plan, adequate utilities exist within the West Washington Street right-of-way to serve this proposed development. These include a 6-inch water main, a 10" sanitary sewer main and a 15" storm sewer main. Also shown are the locations of gas and overhead power. All utility connections are shown on the Applicant's Preliminary Grading & utility plan. This requirement is met.

a. How will the applicant assure there are adequate water, sewer, and storm drainage facilities available to serve the proposed development?

Applicant's Response: The Applicant's engineer has provided a Grading and Utility Plan which has been designed to serve the proposed development. Final engineering plans will be designed and sealed by a registered professional engineer and reviewed by Public Works staff to ensure that the utilities provided meet the City of Stayton design standards as outlined in the municipal code. This requirement will be met.

b. List public services currently available to the site: Water Supply: - inch line available in Street. Sanitary Sewer: - inch line available in Street. Storm Sewer: - inch line available in Street. Natural Gas: - inch line available in Street. Telephone: is (or) is not available in Street. Cable TV: is (or) is not available in Street. Electrical: is (or) is not available in Street.

Applicant's Response: See previous response and the Existing Conditions Plan.

c. Will existing City public services need to be replaced or upgraded to accommodate the demands created by the development?

Applicant's Response: No, City services are adequate to serve this development.

2. TRAFFIC CIRCULATION: How will the development provide for safe and efficient internal traffic circulation, including both pedestrian and motor vehicle traffic, and provision for safe access to and from the property to those public streets and roads which serve the property?

Applicant's Response: The Site Plan shows the entrance driveway from West Washington Street placed as directed by City staff. Truck turning movements have been accommodated on site to allow for backing into the loading dock area. Pedestrian access is provided from the proposed 6-foot sidewalk into the development via a 5-foot wide walkway. This requirement is met.

3. STREET IMPROVEMENTS: How will the development provide 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?

Applicant's Response: No additional street improvements are required. The Applicant is required to provide a 6-foot concrete sidewalk within the West Washington Street right-of-way which is shown on the attached plans. This requirement is met.

4. PARKING AND LOADING AREAS: How will the development provide for parking areas and adequate loading/unloading facilities?

Applicant's Response: Adequate parking for the proposed buildings has been provided (see Preliminary Site Plan). The parking area is paved and striped and there is parking for 7 cars which meets the requirement for this proposed use. Since the area of the storage building is under 5,000 square feet, no actual loading bay is required, however, the area between the storage and office buildings is a truck dock area. This requirement is met.

5. OPEN STORAGE AREAS/OUTDOOR STORAGE YARDS: Are there any open storage areas or outdoor storage yards included in the development? If yes, how will they meet development code standards?

Applicant's Response: There are no open/outside storage areas proposed as part of the project.

6. OFFSITE IMPACTS: How will the development minimize off site impacts such as noise, odors, fumes, or other impacts?

Applicant's Response: The proposed development is located in the city's Light Industrial zone. As such, a certain amount of noise would be expected. The proposed storage building is enclosed so this will help to reduce the noise level outside the building. Given its proposed use, odors and fumes will be minimal and characteristic of those produced by similar uses. Combined with the proposed screening materials, any impacts to the surrounding area will be minimal.

7. DESIGN STANDARDS: How does the proposed development meet the applicable design standards for commercial or multi-family residential development?

Applicant's Response: The proposed development meets the applicable design standards.

8. COMPATIBILITY WITH NEIGHBORING PROPERTIES: How will the design and placement of buildings and other structural improvements provide compatibility in size, scale, and intensity of use between the development and neighboring properties?

Applicant's Response: The proposed buildings meet the applicable setback requirements. There are two non-conforming residential structures located to the west of the property. There are nonconforming residential uses on each side of the proposed development. Given the proposed landscape buffer and existing vegetation in this area, there will be no impacts to either residence. There is an existing commercial use located approximately 65 feet across the railroad tracks to the east. There is an existing industrial building located approximately 140 feet to the north that is almost completely screened by substantial 40-foot-tall cedar trees. Given the location of these existing structures and the Applicant's proposed buildings, there are no compatibility issues with the size or scale of the applicant's proposed buildings.

9. DESIGN WILL SERVE INTENDED USE: How will the location, design, and size of the proposed improvements to the site fulfill the intended purpose of the intended use of the site and will properly serve anticipated customers or clients of the proposed improvements.

Applicant's Response: The location in Stayton (compared to the existing Idanha location) is more centrally located within their service area. Two building are being proposed – an office and a storage that are essential for the functioning of the business and have been architecturally designed to meet the needs of this intended use and the customers it serves.

10. LANDSCAPING: How will the proposed landscaping prevent unnecessary destruction of major vegetation, preserve unique or unusual natural or historical features, provide for vegetative ground cover and dust control, and present an attractive interface with adjacent land use and development?

Applicant's Response: Reference the attached preliminary planting plan prepared by Laurus Designs, LLC.

11. SCREENING: How will the design of any visual or physical barriers around the property (such as fences, walls, vegetative screening, or hedges) allow them to perform their intended function while having no undue adverse impact on existing or contemplated land uses.

Applicant's Response: No fences, walls, vegetative screening, or hedges are proposed..

12. MAINTENANCE: What continuing provisions are there for maintenance and upkeep of the proposed development?

Applicant's Response: As with any business, on-going maintenance and upkeep of existing facilities is extremely important - especially when considering the intended use and significant purpose of this development. With respect to "continuing provisions," it is the Applicant's intention to adequately maintain the proposed landscape, buildings and on-site infrastructure as would be expected with any business operation.