clemow associates LLC

April 13, 2026

Santiam Ballet Academy
Attention: Charlene Vogel
395 N 3rd Avenue
Stayton, Oregon 97383

Sent via email to: santiamballet@gmail.com

Re: **579 E Washington Street Comprehensive Plan Map Amendment and Zone Change – Stayton, Oregon**
Transportation Planning Rule Analysis

C&A Project Number 20260302.00

Dear Ms. Vogel,

This Transportation Planning Rule (TPR) analysis supports the proposed Stayton Comprehensive Plan map amendment and zone change for the property located at 579 E Washington Street, Stayton, Oregon. The following items are presented:

1. Property Description and Proposed Land Use Actions
2. Study Parameters
3. Agency Transportation Plan Review
4. Existing Conditions
5. Development Potential
6. Transportation Analysis
7. Summary

1. PROPERTY DESCRIPTION AND PROPOSED LAND USE ACTIONS

The subject property is located at 579 E Washington Street, Stayton, Oregon. It is identified as tax lot 3200 on Marion County Assessor's map 09-1W-10DB and is approximately 0.42 acres. The property has frontage on and access to E Jefferson Street to the north, E Washington Street to the south, and N 5th Avenue to the west. The property is currently developed with a church.

Proposed land use actions include a Stayton Comprehensive Plan map amendment changing the Plan designation from *Residential* to *Downtown*, and a corresponding zone change from *Low Density Residential* (LD) to *Downtown Residential Mixed Use* (DRMU).

A specific development plan is not part of this land use action. Additionally, the existing church use is considered a nonconforming use in the LD zone. Rezoning the property to DRMU will allow the church to become a conforming use.

2. STUDY PARAMETERS

Criteria to be Addressed

The proposed land use actions include a Comprehensive Plan map amendment and zone change, and a transportation analysis is necessary to address the following:

- Transportation Planning Rule (TPR) criteria outlined in Oregon Administrative Rule (OAR) 660-012-0060
- Stayton Municipal Code Section 17.26.050 – Transportation Impact Analysis Requirements

It is further noted that the proposed land use actions do not contemplate a specific development application; therefore, for analysis purposes, reasonable worst-case development scenarios are assumed in the current and proposed zones.

3. AGENCY TRANSPORTATION PLAN REVIEW

Stayton Transportation System Plan (TSP)

The Stayton Transportation System Plan (TSP) does not identify any transportation system capacity deficiencies in the project area; however, it includes several transportation infrastructure projects, as presented in the following table. This list includes "High" Priority (also identified as "Tier I") projects that are financially-constrained and are assumed to be constructed within the 2040 planning period.

Most City streets have sidewalks on both sides of the roadway and enhanced crossings at key intersections and mid-block locations; however, several streets, including those in the study area, have sidewalk gaps. Accordingly, the TSP pedestrian plan includes projects to fill in the gaps in the sidewalks along the City's arterial and collector streets.

A few major roadways within the City have on-street bike lanes or other bicycle facilities, but many do not. Accordingly, the TSP bicycle plan includes projects to fill in the gaps in the bicycle network along the City's arterial and collector streets.

TABLE 1 – STAYTON TSP PROJECT EXCERPTS

Project Number	Roadway	Segment/Cross-Street	Project	Priority	Cost Estimate
Pedestrian Plan Improvement Projects					
P37	Sixth Avenue	Washington Street to Jefferson Street (both sides)	Install a 6-foot sidewalk on the curb line	Tier III	$80K
P38	Jefferson Street	Sixth Avenue to Tenth Avenue (both sides)	Install a 6-foot sidewalk on the property line	Tier III	$370K
Bicycle Plan Improvement Projects					
B5	Washington Street	First Avenue to Sixth Avenue (both sides)	Restripe to a 6-foot bike lane	Tier I	$210k
B6	Sixth Avenue	Washington Street to Jefferson Street (both sides)	Restripe to a 6-foot bike lane	Tier I	$40K
Motor Vehicle Plan Improvement Projects					
M4	Sixth Avenue S-Curves		All-Way Stop control at E Jefferson Street	High	$630K

4. EXISTING CONDITIONS

Roadway Facilities

The following table summarizes existing roadway classifications and characteristics within the study area.

TABLE 2 – EXISTING ROADWAY CHARACTERISTICS

Roadway	Functional Classification	Lanes	Speed Limit (MPH)	Sidewalks	Bicycle Lanes	On-Street Parking
E Washington Street	Minor Arterial	2	25	North Side Only	No	Yes
E Jefferson Street	Residential Local	2	25	Yes	No	Yes
N 5th Avenue	Residential Local	2	25	East Side Only	No	Yes
N 6th Avenue	Minor Arterial	2	25	Yes	No	Yes

Safety Analysis

When evaluating intersection safety, consideration is given to the total number and types of crashes occurring, as well as the number of vehicles entering the intersection. This leads to the concept known as the "crash rate." Specific to intersections, it is typically expressed as the number of crashes per one million vehicles entering the intersection (CMEV). A critical crash rate analysis is then performed by comparing the subject intersection to the published statewide 90th percentile intersection crash rates at comparable/reference intersections. Crash rates close to or exceeding 1.0 CMEV, or the 90th percentile, require further analysis.

Study area crash data were obtained from the Oregon Department of Transportation (ODOT) for five years from January 1, 2020, through December 31, 2024. The following table presents the study intersection crash rates and the results of the critical crash analysis. Crash data and crash rate calculations are attached for reference.

TABLE 3 – INTERSECTION CRASH RATES

Intersection	2020	2021	2022	2023	2024	Total	Crash Rate (CMEV)	Reference Population [1]	90th%ile Crash Rate	Over or under Crash Rate?
E Washington Street / N 5th Avenue	0	0	0	0	0	0	0	Urban 4ST	0.408	Under
E Washington Street / N 6th Avenue	0	0	0	0	0	0	0	Urban 4ST	0.408	Under
E Jefferson Street / N 5th Avenue	1	0	0	1	0	2	— [2]	Urban 4ST	0.408	Under [2]
E Jefferson Street / N 6th Avenue	0	0	0	0	0	0	0	Urban 4ST	0.408	Under

[1] 4ST is a four-leg minor stop-control intersection.

[2] The intersection entering volume is not known; however, it is estimated to be high enough that with only two recorded crashes in the past five years, the resulting crash rate is less than the 90th-percentile crash rate. Regardless, an additional crash evaluation is performed.

Except at the E Jefferson Street/N 5th Avenue intersection, which is evaluated further below, there are no recorded crashes at the study intersections, and observed crash rates are less than the 1.0 CMEV threshold and the 90th percentile crash rate of the reference population, indicating the intersections are considered relatively safe, and further safety analysis is not warranted.

The following table summarizes the crashes associated with the E Jefferson Street/N 5th Avenue intersection.

TABLE 4 – INTERSECTION CRASH TYPES AND SEVERITY							
Intersection	Crash Type						Total
	Rear End	Turn/ Angle	Fixed Object	Side swipe	Ped/ Bike	Other	
E Jefferson Street / N 5th Avenue	0	2	0	0	0	0	2
	Crash Severity [1]						Total
	PDO	C	B	A	Fatal	Unknown	
	1	0	0	1	0	0	2

[1] PDO – Property Damage Only; Injury C – Possible Injury/Complaint of Pain; Injury B – Non-Incapacitating Injury; Injury A – Incapacitating Injury/Bleeding, Broken Bones; Fatal Injury – Fatality

Based on a detailed review of the crash data, both crashes are "turn/angle", which are common at unsignalized intersections. Both crashes resulted from a motorist on a minor stop-controlled approach (N 5th Avenue) not yielding the right-of-way to a motorist on the major roadway (E Jefferson Street). In one crash, the driver was distracted.

There does not appear to be an easily correctable safety deficiency, nor does the number of crashes appear excessive. Therefore, crash-related mitigation is neither recommended nor necessary as part of this land use action.

5. DEVELOPMENT POTENTIAL

Development Assumptions

The Proposed land use actions include a Stayton Comprehensive Plan map amendment changing the Plan designation from *Residential* to *Downtown*, and a corresponding zone change from *Low Density Residential* (LD) to *Downtown Residential Mixed Use* (DRMU). The proposed land use actions do not contemplate a specific development application. Accordingly, this transportation analysis evaluates impacts from reasonable worst-case development scenarios in the current and proposed zones, as follows:

Current LD Zone Assumptions

- The purpose of the LD zone is to provide for single-family dwelling units, and their accessory uses, and, with conditional use approval, other uses compatible with single-family dwelling units. Density shall not exceed 6 units per acre.
- Considering the property size, reasonable worst-case development is assumed to be one single-family residence.

Proposed DRMU Zone Assumptions

- ▪ The purpose of the DRMU zone is to provide opportunities for residential, commercial, and mixed-use developments within the downtown area. This designation applies to property north, west, and east of the 3rd Avenue central core area, intended to become neighborhoods composed mainly of moderate-density residential uses, ranging from 12 to 30 units per acre, including attached residential structures, condominiums, and townhouses, while also allowing appropriate commercial uses and mixed-use developments.

- The maximum building footprint for any building occupied entirely by a commercial or non-residential use shall be 10,000 square feet.

- The minimum floor area ratio (FAR) for the construction of a new building is 0.20, and there is no maximum FAR.

- The minimum residential density is 12 dwelling units per acre, and there is no maximum density restriction.

- There is no minimum front-yard setback requirement for non-residential or mixed-use buildings, and residential buildings shall have a minimum 5-foot setback. There is no minimum side-yard setback requirement. There is no minimum rear-yard setback requirement for non-residential or mixed-use buildings, and residential buildings shall have a minimum 10-foot setback.

- The minimum building height shall be 2 stories or 20 feet, and the maximum building height shall be 4 stories, which in total shall not exceed 60 feet.

- As identified in Stayton Municipal Code Section 17.16.070.1, with site plan approval, the higher trip-generating permitted uses include: moderate-density residential uses; retail trade uses; finance and insurance uses; professional, scientific, and technical services uses; arts, entertainment, and recreation uses; and general office uses.

- Considering the property size, geographic location, and compatibility with the existing neighborhood uses, the higher trip-generating uses that are practical/reasonable include moderate-density residential uses and professional/medical office uses. As such, reasonable worst-case development is assumed to be either 10 attached single-family residences (at a density of 20 dwelling units per acre) or a 5,500 square-foot medical/dental office use (resulting in a 0.30 FAR).

Development Trip Generation

Using the above-identified development assumptions, trip generation in the current and proposed Stayton zones is estimated using the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 12th Edition, and practices from the ITE *Trip Generation Handbook*, 3rd Edition. Trip generation is as follows:

TABLE 3 – DEVELOPMENT TRIP GENERATION – STATON ZONING

Reasonable Worst-Case Development Assumption	ITE Code	Size	Daily Trips [1]	PM Peak Hour [1]		
				Enter	Exit	Total
Current LD Zone						
Single-Family Detached Housing	210	1 DU	9	1	0	1
Proposed DRMU Zone						
Single-Family Attached Housing	215	10 DUs	69	3	2	5
— OR —						
Medical-Dental Office Building	720	5,500 SF	148	4	11	15
Change in Trip Generation with Proposed Zone Change			**139**	**3**	**11**	**14**

[1] Trip generation estimated using the *Average Rate* for Land Uses 210 and 215, and the *Fitted Curve* for Land Use 720 per recommended practice in the ITE *Trip Generation Handbook*, 3rd Edition.

As identified in the table above, the reasonable worst-case development in the proposed DRMU zone is a 5,500-square-foot medical-dental office building, which generates an additional 139 daily and 14 PM peak hour trips over the current LD zone.

6. TRANSPORTATION ANALYSIS

Transportation Planning Rule (TPR) Criteria

OAR 660-012-0060 (1) states, *"If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:*

(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);

(b) Change standards implementing a functional classification system; or

(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.

(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or

(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan."

OAR 660-012-0060 (9) states, *"Notwithstanding section (1) of this rule, a local government may find that an amendment to a zoning map does not significantly affect an existing or planned transportation facility if all of the following requirements are met.*

(a) The proposed zoning is consistent with the existing comprehensive plan map designation, and the amendment does not change the comprehensive plan map;

(b) The local government has an acknowledged TSP, and the proposed zoning is consistent with the TSP; and

(c) The area subject to the zoning map amendment was not exempted from this rule at the time of an urban growth boundary amendment as permitted in OAR 660-024-0020(1)(d), or the area was exempted from this rule, but the local government has a subsequently acknowledged TSP amendment that accounted for urbanization of the area."

Stayton Municipal Code Section 17.26.050 – Transportation Impact Analysis Requirements

The Stayton Municipal does not specifically identify the transportation analysis thresholds for a Comprehensive Plan amendment and/or a zone change that does not include a specific development application; however, assuming that the requirements are the same as for a specific development application, they are as follows:

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 at schools.*

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 that 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

Evaluation of Agency Criteria

Based on the materials contained in the *Development Potential* section, reasonable worst-case development in the proposed DRMU zone generates an additional 139 daily and 14 PM peak-hour trips over the current LD zone. Accordingly, the proposed land use actions do not meet the City's thresholds requiring a transportation impact analysis.

The proposed land use actions do not contemplate a specific development application. Accordingly, the applicant is not requesting an access spacing exception.

Based on materials contained in the Stayton TSP, any potential property redevelopment is not 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.

Based on the materials contained in the *Safety Analysis* section, any potential property redevelopment is not expected to significantly impact adjacent roadways and intersections previously identified as high-crash locations or areas with a high concentration of pedestrians or bicyclists.

Overall, the proposed zone change will not significantly affect an existing or planned transportation facility, and TPR and Stayton Municipal Code criteria are satisfied without additional analysis. Noting that the proposed land use actions do not include a specific development application, additional transportation analysis may be necessary to address Stayton Municipal Code requirements at the time of development (as part of a future, specific development land use application).

7. SUMMARY

The following conclusions and recommendations are made based on the materials contained in this analysis:

1. The subject property is located at 579 E Washington Street, Stayton, Oregon. It is identified as tax lot 3200 on Marion County Assessor's map 09-1W-10DB and is approximately 0.42 acres. The property has frontage on and access to E Jefferson Street to the north, E Washington Street to the south, and N 5th Avenue to the west. The property is currently developed with a church.

2. Proposed land use actions include a Stayton Comprehensive Plan map amendment changing the Plan designation from *Residential* to *Downtown*, and a corresponding zone change from *Low Density Residential* (LD) to *Downtown Residential Mixed Use* (DRMU).

3. A specific development plan is not part of this land use action. Additionally, the existing church use is considered a nonconforming use in the LD zone. Rezoning the property to DRMU will allow the church to become a conforming use.

4. The Stayton Transportation System Plan (TSP) does not identify any transportation system capacity deficiencies in the project area; however, it includes several transportation infrastructure projects that are assumed to be constructed within the 2040 planning period.

5. Except at the E Jefferson Street/N 5th Avenue intersection, there are no recorded crashes at the study intersections, and observed crash rates are less than the 1.0 CMEV threshold and the 90th percentile crash rate of the reference population, indicating the intersections are considered relatively safe, and further safety analysis is not warranted.

6. At the E Jefferson Street/N 5th Avenue intersection, there are two "turn/angle" crashes, which are common at unsignalized intersections. There does not appear to be an easily correctable safety deficiency, nor does the number of crashes appear excessive. Therefore, crash-related mitigation is neither recommended nor necessary as part of this land use action.

7. Reasonable worst-case development in the proposed DRMU zone is a 5,500-square-foot medical-dental office building, which generates an additional 139 daily and 14 PM peak hour trips over the current LD zone.

8. The proposed land use actions do not meet the City of Stayton's thresholds requiring a transportation impact analysis; the applicant is not requesting an access spacing exception; any potential property redevelopment is not 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 nor is it expected to significantly impact adjacent roadways and intersections previously identified as high-crash locations or areas with a high concentration of pedestrians or bicyclists.

9. Overall, the proposed zone change will not significantly affect an existing or planned transportation facility, and TPR and Stayton Municipal Code criteria are satisfied without additional analysis. Noting that the proposed land use actions do not include a specific development application, additional transportation analysis may be necessary to address Stayton Municipal Code requirements at the time of development (as part of a future, specific development land use application).

Sincerely,

Christopher M. Clemow, PE, PTOE
Transportation Engineer

Attachments: Crash Data

REGISTERED PROFESSIONAL ENGINEER
18300 PE
Digitally Signed 2026.04.13 14:37:47 -06'00'
OREGON
Jan. 16, 1996
CHRISTOPHER M CLEMOW
RENEWS 31 DECEMBER 2027

CITY OF STAYTON, MARION COUNTY **WASHINGTON ST at 5TH AVE, City of Stayton, Marion County, ALL Crashes Severity, ALL Crashes Circumstance, 01/01/2020 to 12/31/2024**

SER# / INVEST / RD DPT / UNLOC?	S P E D	A L C	D R U G S	M J I N V	S C H L	W O R K	DATE / DAY / TIME / LAT	CLASS / DIST / FROM / LONG	CITY STREET / FIRST STREET / SECOND STREET / LRS	RD CHAR / DIRECT / LOCTN	INT-TYPE / (MEDIAN) / LEGS / (#LANES)	INT-REL / TRAF- / CONTL	OFFRD / RNDBT / DRVWY	WTHR / SURF / LIGHT	CRASH / COLL / SVRTY	V#	SPCL USE / TRLR QTY / OWNER / TYPE	MOVE / FROM / TO	P#	PRTC / TYPE	INJ / SVRTY	A G E	S E X	LICNS / RES	PED / LOC	ERROR	ACT	EVENT	CAUSE

OREGON.. DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
TRANSPORTATION DATA SECTION - CRASH ANAYLYSIS AND REPORTING UNIT
URBAN NON-SYSTEM CRASH LISTING

CITY OF STAYTON, MARION COUNTY

WASHINGTON ST at 6TH AVE, City of Stayton, Marion County, ALL Crashes Severity, ALL Crashes Circumstance, 01/01/2020 to 12/31/2024

SER# / INVEST / RD DPT / UNLOC?	S P E D	A L C	D R U G S	M J I N V	S C H L	W O R K	DATE / DAY / TIME / LAT	CLASS / DIST / FROM / LONG	CITY STREET / FIRST STREET / SECOND STREET / LRS	RD CHAR / DIRECT / LOCTN	INT-TYPE (MEDIAN) / LEGS (#LANES)	INT-REL / TRAF- / CONTL	OFFRD / RNDBT / DRVWY	WTHR / SURF / LIGHT	CRASH / COLL / SVRTY	SPCL USE / TRLR QTY / OWNER / V#	MOVE / FROM / TO	P#	PRTC TYPE	INJ SVRTY	A G E	S E X	LICNS RES	PED LOC	ERROR	ACT	EVENT	CAUSE

URBAN NON-SYSTEM CRASH LISTING

CITY OF STAYTON, MARION COUNTY

JEFFERSON ST at 5TH AVE, City of Stayton, Marion County, ALL Crashes Severity, ALL Crashes Circumstance, 01/01/2020 to 12/31/2024

1 - 2 of 2 Crash records shown.

SER# INVEST RD DPT UNLOC?	S P E D	A L C	D R U G S	M J I V	S C H L	W O R K	DATE DAY TIME LAT	CLASS DIST FROM LONG	CITY STREET FIRST STREET SECOND STREET LRS	RD CHAR DIRECT LOCTN	INT-TYPE (MEDIAN) LEGS (#LANES)	INT-REL TRAF- CONTL	OFFRD RNDBT DRVWY	WTHR SURF LIGHT	CRASH COLL SVRTY	V#	SPCL USE TRLR QTY OWNER TYPE	MOVE FROM TO	P#	PRTC TYPE	INJ SVRTY	A G E	S E X	LICNS RES	PED LOC	ERROR	ACT EVENT	CAUSE
00487	N	N	N	N			02/03/2020	19	JEFFERSON ST	INTER	CROSS	N	N	CLR	ANGL-OTH	01	NONE 9	STRGHT										02
NONE							MO	0	5TH AVE	CN		STOP SIGN	N	DRY	ANGL		N/A	E -W									000	00
N							2P			01	0		N	DAY	PDO		PSNGR CAR		01	DRVR	NONE	00	Unk	UNK		000	000	00
N							44 48 5.33	-122 47 24.47																UNK				
																02	NONE 9	STRGHT										
																	N/A	N -S									000	00
																	PSNGR CAR		01	DRVR	NONE	00	Unk	UNK		000	000	00
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03272	N	N	N	N			09/11/2023	19	JEFFERSON ST	INTER	CROSS	N	N	CLR	ANGL-OTH	01	NONE 0	STRGHT										27,02
CITY							MO	0	5TH AVE	CN		STOP SIGN	N	DRY	ANGL		PRVTE	N -S									000	00
N							3P			03	0		N	DAY	INJ		PSNGR CAR		01	DRVR	NONE	80	M	OR-Y		028,016	038	27,02
N							44 48 5.31	-122 47 24.45																OR<25				
																02	NONE 0	STRGHT										
																	PRVTE	W -E									000	00
																	PSNGR CAR		01	DRVR	INJA	45	F	OR-Y		000	000	00
																								OR<25				

OREGON.. DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
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Disclaimer: The information contained in this report is compiled from individual driver and police crash reports submitted to the Oregon Department of Transportation as required in ORS 811.720. The Crash Analysis and Reporting Unit is committed to providing the highest quality crash data to customers. However, because submittal of crash report forms is the responsibility of the individual driver, the Crash Analysis and Reporting Unit can not guarantee that all qualifying crashes are represented nor can assurances be made that all details pertaining to a single crash are accurate. Note: Legislative changes to DMV's vehicle crash reporting requirement, effective 01/01/2004, may result in fewer property damage only crashes being eligible for inclusion in the Statewide Crash Data File.