



March 2, 2026

Subject: Santiam Christian Elementary School Site Plan Review

Re: Completeness Review Second Response

Dear City of Adair Village:

Accompanying this letter is a set of revised drawings for the above-mentioned project for your review and approval. The revisions to the drawings are based on your November 6, 2025, plans review letter. We have annotated your review comments below.

REQUIRED FOR COMPLETENESS (AVDC § 2.130 and 2.140)

1. Application Fee (AVDC § 2.130(6))

An application and review fee shall accompany the application request in accordance with the provisions of Section 1.190 and the City's Fee Resolution.

Response: Owner to provide fee check to City of Adair Village.

2. Site and Vicinity Map (AVDC § 2.140(4)(5)(6)(15))

The subject property consists of a single parent parcel; however, the submitted plans do not depict existing conditions across the entirety of the site.

Revised plans must illustrate the full parcel, including:

- All existing buildings and structures;

Response: Attachments 'A' and 'A-1' have been added to show the existing buildings and structures for the full parcel.

- All site improvements, including parking areas, drive aisles, loading areas, playfields, and recreational facilities;

Response: Attachments 'C' and 'C-1' have been added to show the site improvements for the full parcel.

- Circulation areas, including vehicular, bus, service, and emergency access routes;

Response: Attachments 'E' and 'E-1' have been added to show the vehicular circulation and Attachments 'F' and 'F-1' have been added to show the emergency access circulation for the full parcel. Bus circulation indicated on sheet LU002.

- Pedestrian pathways and sidewalks;

Response: Attachments 'D' and 'D-1' have been added to show pedestrian circulation through pathways and sidewalks for the full parcel.

- Public and private utilities located on or adjacent to the site;

Response: Attachments 'G' and 'G-1' have been added to show the surveyed utilities and additional approximate location of utilities from City mapping data.

- All existing easements of record, including access, utility, and emergency access easements;

Response: Attachments 'B' and 'B-1' have been added to show the existing easements of record.

- Property lines and parcel dimensions.

Response: Attachments 'B' and 'B-1' have been added to show the property lines and dimensions.

- Adjacent street rights-of-way and access points;

Response: Attachments 'E' and 'E-1' have been added to show adjacent streets and access points through vehicular circulation.

- Existing fencing, walls, and screening features;

Response: Fencing locations indicated on attached sheet LU002.

- Stormwater facilities, drainageways, and outfalls; and

Response: Stormwater facilities, drainageways, and outfalls for the full parcel are shown on Attachment 'G' and 'G-1'

- Any significant natural features affecting site development (if applicable)

Response: Non-applicable.

Current materials depict only the immediate elementary school development footprint and are insufficient to support a comprehensive completeness review of campus-wide circulation, access, utility infrastructure, and service integration.

Further, the submitted plan set does not depict the location and alignment of all existing public utilities serving or traversing the campus. Utility information appears limited to the immediate elementary school development area. Revised plans must illustrate all water, sanitary sewer, storm drainage, and franchise utility infrastructure across the entirety of the parent parcel to allow evaluation of system capacity, infrastructure conflicts, and future service coordination.

3. Walls and Fences (2.140(8))

The revised plan illustrates fencing adjacent to the proposed development but does not depict existing fencing throughout the broader campus. All existing fencing, gates, and controlled access points must be shown to determine whether barriers may impede emergency response access, restrict required public or easement access, or affect on-site circulation patterns.

Response: Fencing locations indicated on attached sheet LU002.

4. Pedestrian and Bicycle Circulation (2.140(7)(10))

Pedestrian walkways connecting buildings to parking areas and the public right-of-way are required for

ADA access and circulation review. The revised plan illustrates sidewalks adjacent to the proposed development; however, it does not depict internal pedestrian connections throughout the site or linkages to adjacent public streets.

In addition, the plan set does not identify bicycle circulation routes or bicycle parking facilities serving the development. Multimodal connectivity, including safe pedestrian and bicycle access between buildings, parking areas, and adjacent public rights-of-way, must be demonstrated.

Revised plans shall include:

- Internal pedestrian walkway connections;

Response: See Attachments 'D' and 'D-1' for pedestrian circulation plan.

- Accessible routes meeting ADA standards;

Response: As shown on Architectural Site Plan LU001.

- Pedestrian linkages to adjacent public sidewalks/streets;

Response: See Attachments 'D' and 'D-1' for pedestrian circulation plan.

- Bicycle circulation routes (where applicable); and

Response: No bicycle lanes are provided on existing street infrastructure. No dedicated bicycle paths exist on campus. On campus paths function as multi-modal circulation.

- Bicycle parking locations and quantities consistent with applicable code standards.

Response: New bicycle parking is shown on sheet LU100. Bicycle parking for the High School and balance of campus were addressed under previously permitted projects.

5. Parking and Vehicular Circulation Plan (2.140(9))

A comprehensive parking and circulation plan is required demonstrating compliance with AVDC §§ 5.120– 5.121.

The plan must include:

- Total parking supply and ADA spaces;

Response: See Attachments 'C' and 'C-1' for total existing and proposed parking supply and ADA spaces. Existing ADA Parking locations indicated on attached sheet LU002.

- Bus circulation and staging;

Response: Bus circulation locations indicated on attached sheet LU002.

- Parent pick-up/drop-off routing;

Response: Parent pick-up/ drop-off routing was appended to the traffic study package and was included in the previous submission.

- Pedestrian access routes; and

Response: See Attachments 'D' and 'D-1' for pedestrian circulation plan.

- Connectivity to adjacent public streets.

Response: See Attachments 'D' and 'D-1' for pedestrian circulation plan and Attachments 'E' and 'E-1' for vehicular circulation plan.

The overall site plan depicted on Sheet LU001 is not provided at a legible review scale and lacks sufficient detail to evaluate site circulation. Additionally, Sheet LU100 and the submitted civil plans do not illustrate on-site vehicular or bus circulation patterns within the immediate development area or across the broader campus. As submitted, the materials are insufficient to evaluate parking functionality, pick-up and drop-off operations, emergency access, or internal circulation connectivity.

Additionally, EV infrastructure requirements apply to this proposal. Revised plans must demonstrate compliance with ORS 455.417 and the adopted Oregon Structural Specialty Code (OSSC) EV-ready provisions, including parking calculations, space identification, and associated electrical infrastructure.

6. Stormwater Plan (AVDC § 2.140(13) & (14))

A stormwater analysis, including downstream capacity analysis, is required, as the proposal appears to redirect stormwater flows to a different drainage basin and may impact downstream conveyance facilities.

Response: Additional Stormwater analysis is in progress and will be provided to supplement provided stormwater information.

7. Street Improvement Plans & ROW Dedications (AVDC § 2.140(14))

Pursuant to AVDC § 2.140(14), site plan applications must depict all required frontage improvements and right-of-way dedications necessary to bring abutting streets and streets utilized for site circulation in accordance with the functional classifications and cross-section standards established in the City's Transportation System Plan (TSP).

Required frontage improvements and right-of-way dedications are not fully depicted on the submitted plans for the following street frontages:

- NE Marcus Harris Avenue (Local Street);

Response: Frontage improvements are shown on Attachments 'C' and 'C-1' while the Right-of-Way dedications are shown on Attachments 'B' and 'B-1'.

- NE Vandenberg Avenue (Minor Collector);

Response: Frontage improvements are shown on Attachments 'C' and 'C-1' while the Right-of-Way dedications are shown on Attachments 'B' and 'B-1'.

- NE Arnold Avenue (Minor Collector); and

Response: There are no proposed frontage improvements for NE Arnold Avenue.

- NE Birch Lane (Local Street).

Response: There are no proposed frontage improvements for NE Birch Lane.

The City's TSP establishes functional classifications, cross-section standards, and multimodal facility requirements applicable to each of the above-referenced streets.

Revised plans must clearly depict:

- Existing and proposed right-of-way widths;

Response: *Right-of-Way widths are shown on Attachments 'B' and 'B-1'.*

- Required right-of-way dedications; and

Response: *Right-of-Way dedications are shown on Attachments 'B' and 'B-1'.*

- Existing and proposed street improvements.

Response: *Street improvements are shown on Attachments 'C' and 'C-1'.*

Connectivity Requirements

Consistent with AVDC connectivity provisions and TSP circulation policies, the applicant must demonstrate how the proposed development supports the planned interconnected street network.

Revised plans shall:

- Depict the full public extension of right-of-way and street access along NE Vandenberg Avenue from the intersection of NE Marcus Harris Avenue east to NE Arnold Avenue; and

Response: *The improvements shown are the improvements proposed.*

- Demonstrate how public access connections are secured along NE Marcus Harris Avenue between NE Arnold Avenue and NE Vandenberg Avenue.

Response: *The improvements shown are the improvements proposed.*

These connections must be illustrated in a manner consistent with adopted master plans, the Comprehensive Plan, and the City's Transportation System Plan.

Right-of-Way Dedications

Right-of-way dedication is required along NE Vandenberg Avenue from NE Arnold Avenue right-of-way to the west side of the NE Marcus Harris Avenue intersection. The dedication required must be illustrated on the preliminary plans and in accordance with the City's Transportation System Plan.

In addition, right-of-way dedication along NE Vandenberg Avenue must extend west to the edge of the subject property, consistent with adopted master plans and the City's Comprehensive Plan transportation framework.

Construction of frontage improvements along this roadway segment may be deferred at this time; however, the improvements must be secured through an irrevocable petition for future improvement or a non-remonstrance agreement to ensure proportional participation in future corridor construction.

Right-of-way dedication is also required along NE Marcus Harris Avenue, extending from the NE Vandenberg Avenue intersection north to the subject property boundary. The required dedication must be depicted on the preliminary plans in accordance with the City's Transportation System Plan.

Response: *The improvements shown are the improvements proposed.*

8. Trip Generation / Traffic Assessment (2.140(19))

Upon review of the submitted Traffic Impact Study (TIS), the following items have been identified as

incomplete or deficient. The information provided is insufficient to fully evaluate potential transportation impacts and compliance with applicable circulation and access standards:

a. Peak Hour Queuing and On-Site Stacking Analysis

The study does not include a quantitative analysis of vehicle queue lengths or on-site stacking capacity for parent drop-off and pick-up operations. Given the relocation of approximately 350 elementary students to the southeast circulation area, an evaluation of internal storage capacity and potential queue spillback to adjacent roadways is required.

Response: *To be included in TIS.*

b. Detailed Bell Schedule and Operational Phasing

The analysis does not include detailed school start and dismissal schedules by grade level, including staggered release times, preschool operations, or after-school care. This information is necessary to verify peak traffic timing assumptions and roadway system overlap.

Response: *To be included in TIS.*

c. Special Event and After-Hours Traffic Analysis

No information is provided regarding evening or weekend activities such as sporting events, performances, assemblies, or other campus functions that may generate traffic volumes exceeding typical weekday conditions.

Response: *To be included in TIS.*

d. Pedestrian and Bicycle Circulation Analysis

While existing roadway facilities are inventoried, the study does not evaluate pedestrian or bicycle travel patterns, student walk/bike activity, crossing locations, or separation of pedestrian routes from vehicle queuing areas.

Response: *To be included in TIS.*

e. Private Access Road Capacity – NE Birch Lane

Traffic associated with elementary drop-off and pick-up operations is proposed to shift to NE Birch Lane, identified as a private roadway. The study does not provide documentation regarding roadway width, ownership, maintenance responsibility, access easements, or its capacity to accommodate increased traffic volumes.

Response: *To be included in TIS.*

f. Intersection Operations Evaluation

The study concludes that transportation system impacts will be minimal; however, no intersection capacity or level-of-service analysis is provided for affected study intersections, including NE Arnold Avenue intersections.

Response: *To be included in TIS.*

g. Sight Distance Documentation

The report states that adequate sight distance exists at the NE Arnold Avenue / NE Birch Lane intersection but does not include field measurement exhibits, diagrams, or AASHTO-based stopping sight distance calculations supporting this conclusion.

Response: *To be included in TIS.*

h. Fire and Emergency Access Coordination

Existing queuing conditions are acknowledged as having the potential to obstruct emergency response access; however, the study does not document coordination with the Fire District or evaluate emergency vehicle circulation under proposed conditions.

Response: *To be included in TIS.*

i. Trip Generation Methodology Clarification

Trip generation is based on ITE average rates but does not include localized data, observed school operations, carpool rates, or bus ridership assumptions that may influence actual trip generation characteristics.

Response: *To be included in TIS.*

9. Hours of Operation (2.140(20))

Submit hours and days of operation to allow evaluation of traffic generation, peak-hour impacts, parking demand, and compatibility.

Materials indicate operations from 7:00 a.m. to 5:30 p.m. Please clarify whether evening events, athletics, or special activities are anticipated.

Response: *To be included in TIS.*

10. Site Plan Review Narrative (2.140(23))

A full narrative responding to the Site Plan Review criteria in AVDC § 2.400(2)(a)–(h) is required.

The resubmittal includes brief, conclusory statements asserting compliance but does not provide substantive analysis or specific documentation references. Statements that the development “will comply,” or references to plan sheets and studies without summarizing their relevance, do not satisfy the burden of proof for completeness, which is the responsibility of the applicant.

A revised narrative must address each criterion individually, explain how compliance is achieved, cite supporting materials, and summarize key findings.

Response: *Section 2.400 (2) Decision Criteria (shown below) discusses the criteria by which the development and project will be evaluated by the ‘decision authority’. The submitted document package addresses all components of the stated criteria for the ‘decision authority’s’ findings.*

- (2) Decision Criteria. After an examination of the Site and prior to approval, the decision authority must make the following findings:
- (a) That the proposed development complies with the intent of City's Comprehensive Plan.
 - (b) That there is compliance with City codes and ordinances.
 - (c) That traffic congestion is avoided, pedestrian and vehicular safety are protected, and future street rights-of-way are protected.
 - (d) That proposed signs or lighting will not, by size, location or color, interfere with traffic, limit visibility or impact on adjacent properties.
 - (e) That adequate water, sewage disposal system and utilities for the proposed use are available.
 - (f) That drainage-ways are protected and drainage facilities provided.
 - (g) That the extent of emissions and potential nuisance characteristics are compatible with the land use zone, adjacent land uses, and the standards of all applicable regulatory agencies having jurisdiction.
 - (h) That the characteristics of the proposed development are compatible with the land use zone, the surrounding area and potential impacts have been mitigated to the maximum extent possible.

11. Fire Submission (2.140(23))

A Fire Apparatus Access & Circulation Plan is required.

While a maneuvering drawing (Sheet C270) was provided, it does not depict the entirety of the site and does not demonstrate continuous fire apparatus circulation throughout all on-site drive aisles, fire lanes, and access routes. In addition, portions of the site circulation system appear to rely on access provided private streets. The submitted materials do not demonstrate that this private access route is subject to adequate emergency access rights or that it meets applicable fire apparatus access road standards.

A revised plan must include:

- Fire lane routes and required widths;

Response: Attachments 'F' and 'F-1' have been added to show the overview of emergency access throughout the site and the continuation of the fire lane routes and widths up to NE Arnold Avenue and along NE Birch Lane.

- Turning radii demonstrating apparatus maneuverability throughout the site;

Response: Turning radii are called out on sheet C270.

- Hydrant locations and spacing;

Response: Hydrant locations and spacing have been labeled on sheet C270.

- Fire Department Connection (FDC) location; and

Response: Fire department connection location has been called out on sheet C270.

- Fire lane striping and signage.

Response: Fire lane striping and signage to be coordinated with local fire department during plan review for input and direction.