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Adair Village, OR 97330
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STAFF REPORT

Santiam Christian Elementary School

File No. SPR-26-01

Report Date: June 22, 2026

GENERAL INFORMATION

Item	Description
Applicant/Owner:	Santiam Christian School (represented by Al Stefan) 6011 NE Marcus Harris Avenue, Adair Village, OR 97330
Applicant Representative:	Forward Architecture, LLC (represented by Kaley Fought) P.O. Box 44, Salem, OR 97308
Civil and Structural Engineering:	Devco Engineering Inc. (represented by Steve Hattori and Alex Cheyne) 245 NE Conifer Blvd., Corvallis, OR 97330
Landscape Professional:	Laurus Designs, LLC (represented by Laura Antonson) 1012 Pine Street, Silverton, OR 97381
Request:	Site Plan Review application proposing development of a new approximately 48,000-square-foot elementary school building and associated site improvements at the existing Santiam Christian School campus in Adair Village, Oregon. The proposal includes demolition of an existing school building, construction of new parking and circulation improvements, modifications to student drop-off and pick-up areas, and separation of bus and passenger vehicle circulation.
Site Address:	7220 NE Arnold Avenue, Adair Village, OR 97330
Map/Tax Lot:	10430D000600
Zoning:	E-1 Educational Facilities
Review Body:	Adair Village Planning Commission
Meeting Date:	June 29, 2026
Project Planner:	Laura LaRoque dba Pathfinder Land Use Consulting, LLC P.O. Box 484, Lebanon, OR 97355
Applicable Criteria:	AVDC Sections 2.400, 3.400, 4.141, 5.116, 5.120–5.136, 6.301, Article 8, the City Public Infrastructure Design Standards Manual, the adopted Transportation System Plan, and other applicable City standards identified in this staff report.

REVIEW PROCEDURE

The application is subject to Site Plan Review under AVDC Section 2.400 and Limited Land Use Review under AVDC Section 3.400.

The subject property is located in the Educational Facilities Zone (E-1). Under AVDC Section 4.141(2)(a), educational uses and related support activities are permitted in the E-1 zone, subject to Site Plan Review under AVDC Section 2.400.

Because the proposed elementary school building is approximately 48,000 square feet and exceeds 4,000 square feet, the Planning Commission is the Site Plan Review decision authority.

Pursuant to AVDC Section 2.400(3)(a), Site Plan Review requires Limited Land Use Review by the applicable decision authority in conformance with AVDC Section 3.400.

The Planning Commission may approve, approve with modifications and reasonable conditions, continue, or deny the Site Plan Review application based on the applicable approval criteria and evidence in the record.

Detailed findings addressing the applicable Site Plan Review approval criteria are provided in the findings section below.

AGENCY COMMENTS

Notice of the application was provided to ODOT, Benton County, Adair Village Rural Fire Department, Verdantas, and Ferguson & Associates, Inc. on May 8, 2026.

1. The City's traffic engineering consultant, Ferguson & Associates, Inc., reviewed the applicant's Traffic Impact Study and provided a memorandum dated June 10, 2026. The memorandum concludes that the TIS does not provide sufficient information or analysis to adequately evaluate transportation impacts or demonstrate compliance with the Adair Village Development Code and Transportation System Plan. The review identifies unresolved issues related to Birch Lane/Arnold Avenue operations, on-site queuing, pick-up/drop-off circulation, pedestrian and bicycle connectivity, TSP street classifications, right-of-way dedication, frontage improvements, study horizon, trip-generation assumptions, and supporting documentation.
2. Adair Village Rural Fire Department provided comments after coordination with the Oregon State Fire Marshal's Office. The Fire Department noted that the proposed building is required to be provided with an approved automatic fire sprinkler system and that, based on the current building design, the required fire flow is 1,500 gallons per minute for four hours. The required fire flow may be reduced to 1,000 gallons per minute for four hours if approved fire walls or fire barriers are provided, subject to building and fire code review.

The Fire Department also requested that the Fire Department Connection be located at the southeast corner of the site to provide access to a second hydrant to support the sprinkler system. Because portions of the proposed building are approximately 35 feet tall, the Fire Department also noted that aerial fire apparatus access requirements apply and must be addressed in the design of roads, fire lanes, parking areas, and circulation improvements.

3. Benton County provided comments identifying transportation concerns focused on the intersection of NE Arnold Avenue, NE Birch Lane, and future NE Vandenberg Avenue. The County noted that the existing topography and current level of improvement at the intersection may warrant a rebuild/urbanization project as an off-site improvement for the current proposal. The County further stated that improvements needed at the intersection to mitigate congestion, including the LOS F condition, should be evaluated and identified in the updated Traffic Impact Study requested by Ferguson & Associates, Inc. The County noted that the intersection is slightly superelevated, has a rural section at all four corners, and lacks pedestrian amenities and crosswalks. The County also identified known traffic control issues and stated that intersection improvements would increase safety for the driving, cycling, and pedestrian public, particularly in light of the anticipated increase in traffic.
4. Verdantas, through Civil West Engineering Services, provided engineering review comments dated June 11, 2026. The comments identify recommended requirements if the application is continued or approved with conditions, including right-of-way dedication for NE Vandenberg Avenue, recorded easements for City utilities located outside City right-of-way, recorded easements for downstream drainage facilities located outside the subject property, an agreement to secure future construction of standard right-of-way improvements for the west portion of NE Vandenberg Avenue, construction of public improvements in accordance with AVDC Article 8, and documentation of public access easements or dedicated right-of-way for portions of NE Marcus Harris Avenue relied upon for site circulation. The comments also clarify that the engineering review comments do not resolve the broader TIS deficiencies identified by Ferguson & Associates, Inc.

PUBLIC COMMENTS

Notice was mailed to property owners within 100 feet of the subject property on June 8, 2026, consistent with the Limited Land Use Review notice requirements.

At the time this staff report was finalized, staff had not received public comments regarding the proposal.

APPLICABLE APPROVAL CRITERIA AND FINDINGS

A. Section 2.400(2) Site Plan Review Decision Criteria

The Site Plan Review criteria in AVDC Section 2.400(2) overlap in several areas. To avoid duplication, detailed findings are provided under the criterion most directly addressing the issue. Where an issue is relevant to more than one criterion, the findings cross-reference the primary discussion rather than repeating it.

Criterion 1 addresses Comprehensive Plan intent at a policy level. Criterion 2 addresses general code compliance. Criterion 3 is the primary section for traffic congestion, pedestrian safety, vehicular safety, emergency access, street dedication, public improvements, easements, and protection of future street rights-of-way and transportation-related agency and consultant comments, including the Ferguson & Associates, Inc. TIS review and Benton County's comments regarding the NE Arnold Avenue/NE Birch Lane/future NE Vandenberg Avenue intersection. Criterion 4 addresses signs and lighting impacts. Criterion 5 addresses water, sewer, utilities, fire flow, and utility easements. Criterion 6 addresses drainageways, stormwater, and

drainage facilities. Criteria 7 and 8 address nuisance characteristics, compatibility, and mitigation of potential impacts.

This structure is intended to keep the findings organized and avoid repeating the same analysis under multiple criteria. Where a standard has not been demonstrated to be met, that deficiency is identified under the criterion most directly addressing the issue and is carried forward into the applicable criterion conclusion.

1. That the proposed development complies with the intent of the City's Comprehensive Plan.

Findings

The Comprehensive Plan is a general policy document implemented through the City's Development Code, adopted Transportation System Plan, public improvement standards, utility standards, stormwater and drainage standards, final civil plan review, building/fire code review, and agency coordination. Accordingly, compliance with the intent of the Comprehensive Plan is evaluated in conjunction with the more specific approval criteria addressed in this staff report.

The Land Use Element identifies schools and educational facilities as public and semi-public uses and recognizes the E-1 Educational Facilities District as a district intended to provide for the orderly development and use of land and buildings owned and operated by private or public educational entities for education, training, and support purposes. The proposed replacement elementary school is consistent with the continued educational use of the Santiam Christian School campus.

The Public Facilities and Services Element recognizes Santiam Christian School as an educational facility within the E-1 District and states that public facilities, services, and utilities must be expanded or improved as needed to maintain adequate service levels. The Plan also requires development projects to bear the cost of needed support facilities and requires infrastructure needed for urban development and emergency response to be provided prior to or concurrent with development.

The Comprehensive Plan identifies Adair Rural Fire Protection District as the fire protection and emergency service provider for the City and identifies schools as one of the most significant life-safety considerations in the community. Because the Fire District station is located at 6021 NE Marcus Harris Avenue, between existing and proposed school circulation areas, the proposal must demonstrate that fire access, emergency response access, fire flow, hydrant access, and related fire protection facilities are maintained.

The Transportation Element establishes the policy basis for a safe, convenient, and connected transportation system. The Plan states that transportation facilities form part of the basic framework for community growth and that the City's Master Street Plan must protect needed alignments and rights-of-way. The Transportation Element also recognizes the need for coordinated review of traffic patterns, route choices, traffic hazards, parking, pedestrian facilities, and future street connectivity. These policies are implemented through the Transportation System Plan, Development Code street standards, sidewalk standards, access standards, and public improvement requirements.

The Growth Management Element supports orderly and efficient development, adequate public facility capability, complete and connected street networks, and integration of large institutional uses with the community. These policies apply to the proposed school development because the project involves

substantial site redevelopment, new impervious surface, stormwater facilities, utility improvements, pedestrian facilities, emergency access considerations, and transportation/public improvement obligations.

Summary and Conclusion

The proposed replacement elementary school is generally consistent with the Comprehensive Plan's recognition of the Santiam Christian School campus as an educational use within the E-1 Educational Facilities District. However, Comprehensive Plan compliance depends on the proposal satisfying the City's implementing Development Code, Transportation System Plan, public improvement, utility, drainage, and Site Plan Review criteria.

As discussed under Criteria 2, 3, and 5, the current record does not demonstrate compliance with applicable parking, landscaping/buffering, pedestrian safety, circulation, emergency access, street dedication, future right-of-way protection, utility connection, fire flow, and utility easement requirements. In addition, the current record does not fully evaluate transportation impacts or identify improvements needed to address congestion and safety concerns at the NE Arnold Avenue/NE Birch Lane/future NE Vandenberg Avenue intersection, including the identified LOS F condition. Therefore, based on the current record, the proposal has not demonstrated compliance with the intent of the Comprehensive Plan.

2. That there is compliance with City codes and ordinances.

E-1 Zone Use and Site Plan Review

The subject property is located in the Educational Facilities Zone (E-1). The purpose of the E-1 zone is to provide for the orderly development and use of land and buildings owned and operated by private or public educational entities for education and training purposes or support.

The proposed elementary school is an educational use. Educational uses and related support activities are permitted in the E-1 zone under AVDC Section 4.141(2)(a), subject to Site Plan Review under AVDC Section 2.400.

The proposal includes construction of a new replacement elementary school building, demolition of an existing school building, new parking, circulation improvements, pedestrian improvements, play areas, landscaping, lighting, utilities, stormwater facilities, and related campus improvements. These improvements are educational support activities and are allowed in the E-1 zone.

The proposal includes a new building and alterations to existing site features. Therefore, AVDC Section 4.141(3)(a) and Section 4.141(3)(b) require review and approval under the Site Plan Review provisions of AVDC Section 2.400. Because the proposed building exceeds 4,000 square feet, the Planning Commission is the applicable decision authority.

Public and Semi-Public Use Standards – AVDC Section 6.301

The proposed elementary school is a public/semi-public use under AVDC Section 6.301. Public and semi-public uses include a broad range of civic use types, including educational, recreational, religious, public safety, governmental, utility, cultural, and civic assembly uses or facilities. Because the proposal involves an educational facility, Section 6.301 applies in addition to the requirements of the underlying zone.

(1) Residential District Conditional Use Standard

This standard is not applicable. The subject property is zoned E-1 Educational Facilities District and is not located in a residential district. Therefore, Conditional Use review under this subsection is not required. The proposed elementary school is being reviewed under the applicable procedures and standards for

development within the E-1 District, including Site Plan Review and the Public and Semi-Public Use Standards in AVDC Section 6.301, as applicable.

(2) Commercial or Industrial District Site Plan Review Standard

This standard is not directly applicable because the subject property is zoned E-1 Educational Facilities District and is not located in a commercial or industrial district. However, the proposed elementary school and related campus improvements are subject to Site Plan Review under the City's applicable review procedures. Therefore, while subsection (2) does not independently apply based on the zoning of the property, the proposal is being reviewed through Site Plan Review as required by the applicable provisions of the Adair Village Development Code.

(3) Yard Requirements

This standard applies. The subject property is zoned E-1 Educational Facilities District. AVDC Section 4.141(4)(b) provides: "Yard fronting on an external boundary or street for any new structure or exterior addition to an existing building shall have a minimum depth of 25 feet."

AVDC Section 5.116(2) further provides that no building shall be erected on a lot that abuts a street having only a portion of its required right-of-way dedicated, unless the yard setbacks are increased to accommodate the required right-of-way plus the required yard setback.

The proposed development site is located northeast of the NE Marcus Harris Avenue and NE Vandenberg Avenue intersection. The submitted plans do not clearly show setback distances from external boundary lines, streets, or required future right-of-way lines based on the applicable Transportation System Plan street classifications. Revised plans are needed to demonstrate compliance with the required 25-foot yard setback, including any increased setback required under AVDC Section 5.116(2).

(4) Landscaping, Fencing, Buffers, and Screening

Applicable Code Provisions:

AVDC Section 6.301(4) provides that additional landscaping, fencing, buffers, or other screening devices may be required to screen or protect adjacent properties or the street.

AVDC Section 5.134 requires all yard setbacks and parking areas to be landscaped and establishes standards for landscaping, fencing, screening, and maintenance.

AVDC Section 5.120(1)(e) provides that the outer boundary and all landscaped islands of a parking area shall be contained by a 6-inch-high curb for protection of landscaping, pedestrian walkways, and to contain rainwater runoff. No motor vehicle may project over a property line.

AVDC Section 5.122(3) requires clear vision areas at street intersections and driveway-street intersections. Clear vision areas may not contain plantings, fences, walls, structures, or other obstructions exceeding 2.5 feet in height, except trees may be allowed if branches and foliage are maintained at least 8 feet above grade.

AVDC Section 5.134(3) regulates fencing. Fences and walls may not contain hazardous materials unless approved by the Planning Commission. Fences must be maintained in safe condition, located within property lines, and comply with clear vision requirements. Fence height is limited to 6 feet in side or interior yards. In any front or exterior yard abutting a street, fence height is limited to 3 feet, except that it may be extended to 4 feet if the top one foot is of a material or design that allows at least 50 percent visibility. Front or exterior yard fences may not exceed 3 feet in height until they are at least 12 feet from the outside of the sidewalk, curb edge, or property line. Sight-obscuring fences, walls, or landscaping may be required to screen objectionable activities as part of the City's review and approval process.

Finding

These standards apply. The proposed elementary school is a public/semi-public educational use in the E-1 Educational Facilities District. The proposed development site is located northeast of the NE Marcus Harris Avenue and NE Vandenberg Avenue intersection.

The only adjacent properties owned by others are the Adair Rural Fire Protection District station at 6021 NE Marcus Harris Avenue, located north of the proposed development site, and the Oregon State Game Commission property at 7167 NE Purple Vetch Lane, located south of NE Vandenberg Avenue. These adjacent uses are public, semi-public, or institutional in character and are generally compatible with the proposed school use. The record does not identify adjacent residential properties or other sensitive uses that would require sight-obscuring screening.

Landscaping and Fencing Along Proposed School Building:

AVDC Section 5.134 requires all yard setbacks and parking areas to be landscaped. Exterior yard setbacks adjacent to a street must include one 8-foot-high tree for each 40 feet of street frontage and the equivalent of one 1-gallon accent shrub for each 100 square feet of landscaped area. All other yard setbacks must contain landscaped trees, shrubs, and groundcover, and other unused site areas must be maintained in suitable living groundcover and kept clean and weed-free.

Landscape Plan L-100 shows proposed landscaping around portions of the school building, play area, pedestrian areas, and adjacent site improvements. However, the submitted plans do not include calculations demonstrating that exterior yard setbacks adjacent to streets provide the required number of street trees and accent shrubs under AVDC Section 5.134, including along NE Marcus Harris Avenue, NE Vandenberg Avenue, NE Birch Lane, and any other applicable street frontage. Revised landscape plans are needed to identify the applicable exterior yard setback areas and demonstrate compliance with the landscaping standards.

Landscape Plan L-100 also shows a proposed 4-foot-tall black vinyl-coated chain-link fence south and east of the proposed school building and along a portion of the north side of the building. The proposed fence does not appear to include prohibited hazardous materials, barbed wire, or electric fencing. A 4-foot-tall chain-link fence may comply with AVDC Section 5.134(3) where located in a side or interior yard, or where located in a front or exterior yard abutting a street if it satisfies the visibility and setback limitations in AVDC Section 5.134(3)(c). Because chain-link fencing allows visibility, the material appears capable of satisfying the requirement that the top one foot allow at least 50 percent visibility.

However, the submitted plans must demonstrate that any portion of the 4-foot-tall fence located in a front or exterior yard abutting a street is at least 12 feet from the outside of the sidewalk, curb edge, or property line, as applicable. The plans must also show that no fence or other obstruction exceeding 2.5 feet in height is located within a required clear vision area under AVDC Section 5.122(3).

Parking Lot Landscaping and Buffering:

The submitted plans do not demonstrate adequate landscaping or buffering between the proposed parking lot and NE Vandenberg Avenue to the south or NE Birch Lane to the north and east. Except for landscaping associated with the parking lot itself, the plans do not show a sufficient landscape buffer or frontage treatment along these street and circulation frontages.

Because AVDC Section 6.301(4) authorizes additional landscaping, fencing, buffers, or other screening devices where necessary to screen or protect adjacent properties or the street, and because AVDC Section 5.134 requires yard setbacks and parking areas to be landscaped, the proposed parking lot does not demonstrate compliance with the applicable landscaping and buffering standards. AVDC Section 5.120(2)(b) further provides that off-street parking areas may be located in a required yard setback only if a 5-foot-wide

landscaped buffer and screening, as required by AVDC Section 5.134, is maintained at the property line. The submitted plans do not clearly demonstrate whether the parking area is located within a required yard setback or, if so, whether the required 5-foot-wide landscaped buffer and screening are provided.

In addition, the submitted plans do not clearly demonstrate compliance with AVDC Section 5.120(1)(e), which requires the outer boundary and all landscaped islands of a parking area to be contained by a 6-inch-high curb and prohibits motor vehicles from projecting over a property line.

Conclusion

The landscaping and fencing associated with the proposed school building appear generally consistent with AVDC Section 6.301(4) and AVDC Section 5.134. However, the submitted plans do not demonstrate compliance with exterior yard street frontage landscaping standards along NE Marcus Harris Avenue, NE Vandenberg Avenue, NE Birch Lane, and any other applicable street frontage. The plans also do not demonstrate compliance with the applicable parking lot landscaping, buffering, screening, and curbing standards along NE Vandenberg Avenue and NE Birch Lane, including AVDC Sections 5.120(1)(e), 5.120(2)(b), 5.134, and 6.301(4). Therefore, these standards are not met.

(5) Off-Street Parking

Applicable Code Provision

AVDC Section 6.301(5) requires off-street parking for public and semi-public uses to comply with AVDC Section 5.121.

For a pre-school, nursery, or kindergarten, AVDC Section 5.121(4)(c) requires: "Two spaces per teacher."

For an elementary and middle school, AVDC Section 5.121(4)(d) requires: "One space per classroom plus one space per administrative employee."

AVDC Section 5.121(4)(e) applies to other public assembly or meeting rooms and requires parking based on the greater of the applicable assembly-room calculation, including spaces based on seats, bench length, or floor area where fixed seats are not provided.

When several uses occupy a single structure or parcel of land, AVDC Section 5.120(6) requires the total off-street parking requirement to be the sum of the requirements for the several uses computed separately.

OAR 918-460-0200 requires certain newly constructed buildings or parking areas located on the site and serving the building to install electric vehicle charging station infrastructure for at least 20 percent of the vehicle parking spaces, rounded up to the nearest whole number.

Finding

These standards apply. The proposed development includes an elementary school serving kindergarten through fifth grade, together with a gymnasium, library/media area, administrative and support spaces, and specialty rooms, including art, STEM, music, student support, health, counselor, itinerant, and principal spaces.

AVDC Section 5.121 establishes parking minimums rather than parking maximums. The Code does not appear to establish a maximum number of parking spaces for this use. Therefore, providing more than the minimum number of spaces is not a basis for noncompliance. However, the minimum required parking calculation must still be demonstrated, and the proposed parking area must comply with applicable landscaping, buffering, curbing, circulation, pedestrian safety, stormwater, and EV infrastructure requirements.

Sheet LU100 identifies 111 new parking spaces and a stated minimum requirement of 85 spaces, based on a calculation of two spaces per classroom for 18 classrooms plus one space per six seats for 294 gym seats.

However, the applicant's stated calculation does not clearly correspond to the applicable AVDC Section 5.121 parking categories because it does not identify the number of kindergarten teachers, elementary classrooms, administrative employees, or whether the gymnasium or other spaces are proposed to function as separate public assembly areas outside normal school use.

The parking count is also inconsistent within and across the submitted plans. Sheet LU100 identifies 111 new parking spaces, but also lists 7 accessible spaces and 107 standard spaces, which totals 114 spaces, not 111 spaces. In addition, the parking stall count shown on Sheet C222 should be reconciled with the parking count shown on Sheet LU100. The applicant has not clarified whether the stated parking supply represents new spaces within the project area only or the total parking supply available to serve the proposed elementary school and related campus uses after development.

OAR 918-460-0200 requires EV charging station infrastructure for applicable newly constructed buildings and parking areas. Based on 111 parking spaces, 20 percent equals 22.2 spaces, rounded up to 23 spaces. If the correct parking count is 114 spaces, 20 percent equals 22.8 spaces, also rounded up to 23 spaces. Therefore, EV charging station infrastructure is required for at least 23 parking spaces, subject to confirmation through building and electrical permit review.

Conclusion

The submitted parking information does not clearly demonstrate compliance with AVDC Section 5.121. The applicant's parking calculation does not clearly correspond to the applicable AVDC parking categories, and the parking count is inconsistent between Sheet LU100 and Sheet C222. The applicant must clarify the required parking calculation, reconcile the proposed parking count, and identify whether the parking supply represents new spaces within the project area or the total parking supply available to serve the proposed elementary school and related campus uses after development. Therefore, compliance with the minimum off-street parking count standard has not been demonstrated.

(6) Equipment and Material Storage in Residential Districts

This standard is not applicable. The subject property is zoned E-1 Educational Facilities District and is not located in a residential district. Therefore, the enclosed-building requirement for equipment and material storage in residential districts does not apply, and Conditional Use review under this subsection is not required.

(7) Exterior Lighting

This standard applies because exterior lighting is proposed. The subject property is zoned E-1 Educational Facilities District. Although the proposed development site is not within a residential district, R-3 zoned property is located south of NE Vandenberg Avenue.

Electrical Site Plan E1.1, dated February 10, 2026, identifies proposed site lighting consisting of six parking lot lights and one 1200A MDP near the service yard. The plan does not identify exterior building-mounted lighting. No exterior building-mounted lighting is approved under the current application materials. Because residentially zoned property is located south of NE Vandenberg Avenue, exterior lighting must be directed away from the R-3 zoned property and designed to avoid glare, visibility impacts, or unnecessary light spillover onto nearby residentially zoned land.

The submitted plan identifies the general location of proposed parking lot lighting, but the record does not clearly demonstrate fixture type, mounting height, shielding, photometric levels, or light spillover at the southern frontage adjacent to NE Vandenberg Avenue. The applicant would need to submit a final lighting or photometric plan demonstrating compliance with this standard before it could be found met.

(8) Offices and Workshops

This standard is not applicable. The subject property is zoned E-1 Educational Facilities District and is not located in a residential district. The proposal is for an elementary school, and any administrative offices or support spaces shown on the floor plan are accessory to and supportive of the proposed school use. Therefore, Conditional Use review under this subsection is not required.

(9) Public Utility Facilities

This standard is not applicable. The proposal is for an elementary school in the E-1 Educational Facilities District and does not include a public utility treatment facility, public utility maintenance area, or public utility storage area.

Utility connections, extensions, stormwater facilities, and related infrastructure serving the proposed school are accessory to the school development and are not separate public utility facilities subject to this subsection. Those improvements are reviewed through the applicable Site Plan Review criteria, final civil plan review, public works standards, utility provider requirements, and any applicable stormwater or building permit requirements.

(10) Minimum Lot Size Waiver

This standard is not applicable. The subject property is zoned E-1 Educational Facilities District, and the E-1 zone does not establish a minimum lot size requirement. Because no minimum lot size requirement applies, no waiver is requested or required. Therefore, the decision authority does not need to make findings regarding whether a minimum lot size waiver would result in noise or other detrimental impacts to adjacent or nearby property.

Summary Finding – AVDC Section 6.301

The proposed elementary school is a public/semi-public educational use subject to AVDC Section 6.301. Several standards are not applicable because the site is zoned E-1 Educational Facilities District and is not located in a residential, commercial, or industrial district. Specifically, subsections (1), (2), (6), (8), (9), and (10) are not applicable or do not independently apply based on the zoning and nature of the proposal.

Subsection (3), relating to yard requirements, has not been fully demonstrated because the submitted plans do not clearly show applicable setbacks or demonstrate whether setbacks are measured required future right-of-way lines based on the applicable Transportation System Plan street classifications. This issue could be addressed through revised plans.

Subsection (7), relating to exterior lighting, has not been fully demonstrated because the submitted plans do not include fixture type, mounting height, shielding, photometric levels, or light spillover information. This issue could be addressed through a final lighting or photometric plan.

However, subsections (4) and (5) have not been demonstrated to be met. For subsection (4), the submitted plans do not demonstrate compliance with applicable exterior yard street frontage landscaping standards along NE Marcus Harris Avenue, NE Vandenberg Avenue, NE Birch Lane, and any other applicable street frontage. The plans also do not demonstrate compliance with applicable parking lot landscaping, buffering, screening, and curbing standards along NE Vandenberg Avenue and NE Birch Lane.

For subsection (5), the applicant has not provided the parking calculation necessary to confirm compliance with AVDC Section 5.121, including the number of kindergarten teachers, elementary classrooms, administrative employees, and any applicable assembly-room parking calculation.

The applicable Public and Semi-Public Use Standards in AVDC Section 6.301 have not all been demonstrated to be met. Specifically, compliance with subsections (3), (4), (5), and (7) has not been fully established. Therefore, AVDC Section 6.301 is not met based on the current record.

Building Size

The submitted plans identify the project as a single-story replacement elementary school of approximately 47,496 square feet.

Building Height

AVDC Section 4.141(4)(c) provides that no new freestanding structure or addition shall exceed 50 feet in height.

The submitted exterior elevations, including Sheet LU101 and Sheet LU102 dated January 29, 2026, show the proposed elementary school as a one-story structure. The elevations identify the top of roof framing at the gymnasium at approximately 30 feet, the top of roof framing at the commons at approximately 15 feet, typical roof framing at approximately 14 feet, and the top of the tilt-up panel at approximately 35 feet.

Based on the submitted exterior elevations, the proposed building height is below the 50-foot maximum height allowed in the E-1 zone. Therefore, this standard is met. However, because portions of the building are approximately 35 feet tall, aerial fire apparatus access requirements are addressed separately under the fire access and emergency circulation findings.

Yards/Setbacks

AVDC Section 4.141(4)(b) requires any yard fronting on an external boundary or street for a new structure or exterior addition to an existing building to have a minimum depth of 25 feet. AVDC Section 5.116(2) further provides that no building may be erected on a lot that abuts a street having only a portion of its required right-of-way dedicated unless the yard setbacks are increased to accommodate the required right-of-way plus the required yard setback. AVDC Section 5.116(3) allows the Planning Commission to require additional setbacks, street right-of-way dedications, utility easements, and street improvements for development projects that are required to be submitted for review and approval.

The submitted plans do not currently demonstrate compliance with AVDC Sections 4.141(4)(b), 5.116(2), and 5.116(3). The applicant would need to submit revised plans demonstrating applicable setbacks from existing and required future right-of-way lines based on the applicable Transportation System Plan street classifications before this standard could be found met.

Utilities

AVDC Section 4.141(4)(a) requires each E-1 site to be adequately served by public utilities, including municipal water and sewer service. AVDC Sections 5.127 and 5.128 require water and sanitary sewer systems to be approved by the City as part of the review and approval process. AVDC Section 5.129 addresses underground utilities, and AVDC Section 5.130 requires utility easements for sewers, water mains, and public or private utilities necessary to provide full service to development.

Detailed findings regarding the adequacy of water, sanitary sewer, utilities, fire flow, hydrant access, and utility easements are provided under Criterion 5.

Public Improvement Requirements

AVDC Article 8 establishes improvement requirements for public improvements and connections to public facilities. AVDC Section 8.100 requires public improvements and connections to public facilities installed by a developer to conform to the Development Code, City design standards, and City construction specifications.

AVDC Section 8.200 requires plans and specifications for public facilities to comply with the Code and applicable City ordinances. AVDC Section 8.300 requires improvements to serve each building site and each property in a development, including streets, drainage facilities, sanitary sewer, water system, sidewalks, bicycle routes, and utilities.

The proposed development includes a new school building, new parking and circulation areas, stormwater facilities, utility improvements, pedestrian facilities, fire access improvements, and street-related improvements. Article 8 applies to these improvements. Detailed findings regarding transportation-related improvements are provided under Criterion 3. Detailed findings regarding utility improvements are provided under Criterion 5. Detailed findings regarding drainage and stormwater improvements are provided under Criterion 6. Compliance with Article 8 is evaluated through the detailed transportation, utility, and drainage findings under Criteria 3, 5, and 6.

Public Infrastructure Design Standards Manual

AVDC Section 8.700 adopts the City's Public Infrastructure Design Standards Manual, effective July 1, 2009, as the design and construction standard for public improvements, including improvements and extensions of the water system, sanitary sewer system, storm sewer system, streets, sidewalks, and driveways.

The Public Infrastructure Design Standards Manual applies to improvements involving water, sewer, drainage, and transportation infrastructure. The manual requires applicants to design and construct required public works improvements to City standards. The manual also requires applicants to provide water facilities, sewer facilities, street and transportation facilities, and storm drainage facilities for their development.

The proposed development includes public and private improvements serving the school campus, including streets, sidewalks, driveways, water, sanitary sewer, storm drainage, fire protection facilities, utilities, and related appurtenances. These improvements must be designed and constructed in accordance with the Development Code, adopted Transportation System Plan, and Public Infrastructure Design Standards Manual. Detailed findings applying these standards are provided under Criteria 3, 5, and 6, as applicable.

Conclusion: The Public Infrastructure Design Standards Manual applies to public and private infrastructure improvements serving the development. Compliance is evaluated through the detailed findings under Criteria 3, 5, and 6.

Streets, Access, and Public Improvements

AVDC Section 5.123 requires street location, width, and grade to be considered in relation to existing and planned streets, topography, public convenience and safety, and the proposed use of land to be served. AVDC Section 5.123 also requires street design to conform to City design standards and include curbs, gutters, sidewalks, and utility easements unless specifically exempted by the City. AVDC Section 5.123(8) requires additional right-of-way at the time of land use approval when existing streets adjacent to or within a tract are of inadequate width. AVDC Section 5.124 requires public sidewalk improvements for all property development in the City.

The proposed development relies on NE Marcus Harris Avenue, NE Vandenberg Avenue, NE Birch Lane, and NE Arnold Avenue for school circulation, parent/guardian drop-off and pick-up, bus circulation, service access, pedestrian access, emergency response, and access to existing and proposed campus facilities. Detailed findings regarding traffic congestion, pedestrian and vehicular safety, emergency access, street dedication, easements, public improvements, and protection of future rights-of-way are provided under Criterion 3.

Conclusion: The street, access, sidewalk, easement, dedication, and public improvement standards are addressed in greater detail under Criterion 3.

Minimum Off-Street Parking and EV Infrastructure

AVDC Sections 5.120 and 5.121 establish off-street parking requirements, and AVDC Section 6.301(5) requires public and semi-public uses to comply with AVDC Section 5.121. Detailed findings regarding the applicable parking calculation, parking count inconsistencies, and EV charging infrastructure requirements are provided above under AVDC Section 6.301(5), Off-Street Parking.

Parking lot circulation, access, queuing, pedestrian safety, and vehicle movement are addressed under Criterion 3. Parking lot landscaping, buffering, screening, and curbing are addressed above under AVDC Section 6.301(4) and AVDC Section 5.134.

Pedestrian and Bicycle Facilities – AVDC Sections 5.124 and 5.125

AVDC Section 5.124 requires public sidewalk improvements for all property development in the City and requires sidewalks to connect to and align with existing sidewalks. AVDC Section 5.125 requires developments adjoining existing or proposed bikeways to include provisions for connection and extension of such bikeways through easements or rights-of-way. The City may require bikeway improvements for developments that will benefit from bikeways.

The submitted materials show some pedestrian connections between the proposed school building, parking areas, campus walkways, and adjacent circulation routes, and identify bicycle parking serving the proposed elementary school. However, the plans do not demonstrate complete sidewalk frontage improvements along the full extent of the adjacent roadways relied upon for school circulation, including NE Marcus Harris Avenue, NE Vandenberg Avenue, and NE Birch Lane. The plans also do not show a continuous internal pedestrian sidewalk connection from the proposed school building, parking areas, and drop-off areas to the adjacent public right-of-way along NE Arnold Avenue.

No on-street bicycle lanes are shown on the submitted plans. Bicycle-related roadway improvements are addressed under the street dedication and TSP public improvement findings in Criterion 3, including the findings for NE Vandenberg Avenue, which is identified in the TSP as a planned Minor Collector.

Conclusion: Based on the current record, compliance with AVDC Sections 5.124 and 5.125 has not been demonstrated. The plans do not demonstrate complete sidewalk frontage improvements, a continuous internal pedestrian connection to NE Arnold Avenue, or compliance with applicable bicycle-related TSP street improvement requirements where required. Detailed findings regarding pedestrian safety, sidewalk connectivity, bicycle-related roadway improvements, private street function, easements, and protection of future rights-of-way are provided under Criterion 3.

Fire Access, Fire Flow, and Fire Protection

The submitted plan set includes a fire access and maneuvering plan, and the architectural plans identify the proposed building as sprinklered. The proposed school use requires emergency access and fire protection. Compliance with City codes and ordinances requires adequate fire apparatus access, hydrant access, fire flow, fire lanes, gate access, and Fire Department Connection location.

Adair Village Rural Fire Department provided comments after coordination with the Oregon State Fire Marshal's Office. The Fire Department noted that, due to the size of the building, the proposed structure is required to be provided with an approved automatic fire sprinkler system. Based on the current building design, the required fire flow is identified as 1,500 gallons per minute for four hours. The Fire Department also noted that if the applicant elects to add approved fire walls or fire barriers to separate different areas of the building, the required fire flow may be reduced to 1,000 gallons per minute for four hours, subject to building and fire code review.

The Fire Department requested that the Fire Department Connection be located at the southeast corner of the site to provide access to a second hydrant to support the sprinkler system. The Fire Department also noted that portions of the proposed building are approximately 35 feet tall, which triggers aerial fire apparatus access requirements. The submitted materials do not clearly demonstrate final Fire Department Connection location, hydrant support for the sprinkler system, fire flow availability, or whether the proposed roads, fire lanes, parking areas, and circulation improvements will accommodate required aerial apparatus access spacing and operations.

Detailed findings regarding emergency access, NE Marcus Harris Avenue as a shared access route, fire apparatus circulation, hydrant access, Fire District access, fire flow, and protection of emergency response routes are provided under Criteria 3 and 5.

Conclusion: Fire access and fire protection requirements are addressed in greater detail under Criteria 3 and 5. Compliance has not been independently determined under this subsection.

Stormwater and Drainage – AVDC Section 5.126

AVDC Section 5.126 requires property owners to provide proper drainage and protect runoff and drainageways from disruption or contamination. The Code requires all proposed storm drainage system design plans to be approved by the City and requires surface water drainage patterns and proposed storm drainage to be shown on development plans. AVDC Section 5.126 requires storm drainage design to accommodate upstream runoff and downstream impacts. Offsite improvements are required where necessary to serve the development and protect downstream drainage facilities.

The proposal includes stormwater collection, detention, water quality treatment, conveyance, outfall, and discharge facilities. Detailed findings regarding drainageway protection, stormwater collection, detention, water quality, downstream impacts, and long-term maintenance are provided under Criterion 6.

Conclusion: Stormwater and drainage compliance are addressed in greater detail under Criterion 6. Compliance has not been independently determined under this subsection.

Landscaping, Fencing, Screening, and Parking Lot Buffering

AVDC Section 5.134 requires required yards and parking areas to be landscaped and maintained and regulates fencing, including materials, maintenance, height, setbacks, and clear vision compliance. Detailed findings regarding landscaping, fencing, screening, parking lot buffering, curbing, and clear vision compliance are provided above under AVDC Section 6.301(4), Landscaping, Fencing, Buffers, and Screening.

As discussed in that section, the submitted plans do not demonstrate compliance with all applicable exterior yard street frontage landscaping standards, including along NE Marcus Harris Avenue, NE Vandenberg Avenue, NE Birch Lane, and any other applicable street frontage. The plans also do not demonstrate compliance with applicable parking lot landscaping, buffering, screening, and curbing standards along NE Vandenberg Avenue and NE Birch Lane. Therefore, compliance with AVDC Section 5.134 has not been demonstrated.

Exterior Site Lighting – AVDC Section 5.135

AVDC Section 5.135 provides that exterior lighting shall be arranged so as not to face directly into oncoming traffic or into adjacent residences. Detailed findings regarding exterior site lighting are provided above under AVDC Section 6.301(7) and below under Criterion 4.

As discussed in those sections, Electrical Site Plan E1.1, dated February 10, 2026, identifies proposed site lighting consisting of six parking lot lights and one 1200A MDP near the service yard. However, the submitted plans do not include fixture type, mounting height, shielding, photometric levels, or light spillover information.

The plans also do not identify exterior building-mounted lighting, public street lighting, or sign lighting, and no such lighting is approved under the current application materials.

Because R-3 zoned property is located south of NE Vandenberg Avenue, all exterior lighting must be directed away from the R-3 zoned property and arranged so that it does not face directly into oncoming traffic, create glare, interfere with visibility, or spill unnecessarily onto adjacent properties or streets. Compliance with AVDC Section 5.135 has not been fully demonstrated and would need to be addressed through a final lighting or photometric plan.

Signage – AVDC Section 5.136

AVDC Section 5.136 regulates signs visible from a public right-of-way and includes standards for location, illumination, glare, visibility, and vision clearance. The applicant states that no signage is proposed under this application. Therefore, AVDC Section 5.136 is not applicable to this approval. Any future signage, including permanent, temporary, directional, parking, identification, or illuminated signage, shall require separate City review and approval for compliance with AVDC Section 5.136.

Change or Abandonment of Use

AVDC Section 4.141(5) addresses change or abandonment of use within the E-1 Educational Facilities District. This provision does not apply because the proposal continues the existing educational use of the Santiam Christian School campus through construction of a replacement elementary school and related campus improvements. Therefore, AVDC Section 4.141(5) is not applicable.

Conclusion – Criterion 2

The proposal has not demonstrated compliance with all applicable City codes and ordinances. Specifically, the submitted plans do not demonstrate compliance with exterior yard street frontage landscaping standards, parking lot landscaping, buffering, screening, and curbing standards, or applicable yard/setback requirements measured from existing and required future right-of-way lines based on the Transportation System Plan street classifications. The applicant has also not provided consistent parking information or a parking calculation demonstrating compliance with AVDC Section 5.121.

Pedestrian and bicycle facility, exterior lighting, utility connection, capacity, fire flow, hydrant access, and utility easement requirements have not been fully demonstrated based on the current record. Other code standards are either not applicable, can be found met based on the submitted plans, or are addressed in greater detail under Criteria 3, 5, and 6. Therefore, Criterion 2 is not met based on the current record.

3. That traffic congestion is avoided, pedestrian and vehicular safety are protected, and future street rights-of-way are protected.

Traffic Study and Trip Generation

The applicant submitted a revised Traffic Impact Study dated January 26, 2026, revised April 15, 2026. The applicant's TIS evaluates the proposed elementary school building, revised campus circulation, parking improvements, parent/guardian drop-off and pick-up operations, bus circulation, site access, intersection operations, queuing, sight distance, and completeness-related transportation items. The applicant's TIS states that the new school building will allow for programmatic changes to existing classroom use and a modest increase in student enrollment, while also modifying motor vehicle circulation patterns to provide additional storage for parent/guardian drop-off and pick-up queues and to separate bus and automobile circulation areas.

The City's traffic engineering consultant, Ferguson & Associates, Inc., reviewed the applicant's TIS and provided a memorandum dated June 10, 2026. The memorandum concludes that the TIS does not provide

sufficient information or analysis to adequately evaluate the transportation impacts of the proposed development or demonstrate compliance with applicable provisions of the Adair Village Development Code and Transportation System Plan. The review identifies unresolved issues related to Birch Lane/Arnold Avenue operations, on-site queuing, pick-up and drop-off circulation, pedestrian and bicycle connectivity, TSP street classifications, right-of-way dedication, frontage improvements, study horizon, trip generation assumptions, and supporting documentation.

The applicant's TIS identifies an increase in total campus enrollment from 742 students in the 2025/2026 school year to 815 students in the 2029/2030 school year, an increase of 73 students. The projected increase includes changes across preschool, elementary, middle/junior high, and high school enrollment, with elementary enrollment increasing from 331 to 350 students.

Using Institute of Transportation Engineers (ITE) trip-generation data, the 73-student increase is estimated to generate 148 additional daily trips, 55 AM peak-hour trips, 14 PM roadway peak-hour trips, and 37 PM school peak-hour trips. Using local data, the increase is estimated to generate 58 AM peak-hour trips and 54 PM school peak-hour trips. The TIS states that local data is used in the intersection analysis.

The City's traffic engineering consultant questioned whether the study horizon and trip-generation assumptions are adequate because the applicant's TIS appears to rely on short-term enrollment projections rather than the long-term design capacity of the elementary school and overall campus. The consultant noted that the proposed building is substantially larger than the building being demolished and that redistribution of classroom space within remaining buildings may result in a design capacity greater than the 2029/2030 enrollment forecast. Without a trip-generation analysis based on design capacity, the record may understate future traffic, circulation, queuing, and mitigation needs.

The applicant's TIS concludes that the analyzed public intersection approaches are expected to operate within applicable mobility standards and that 95th-percentile queues can be accommodated on analyzed intersection approaches in all study scenarios. However, the City's traffic engineering consultant found that the TIS identifies LOS F operations at the Birch Lane/Arnold Avenue intersection in the appendix, but does not clearly address that condition in the body of the report or identify mitigation to alleviate the forecast congestion.

Accordingly, while the applicant's TIS concludes that the analyzed public intersection approaches would operate within applicable mobility standards, the record does not fully demonstrate that off-site traffic congestion has been avoided. In addition, the Site Plan Review criterion also requires review of pedestrian and vehicular safety, emergency access, internal circulation, private street function, queuing, and protection of future street rights-of-way. Those issues are addressed in the findings below, have not been fully resolved based on the current record, and would require additional plans and findings demonstrating compliance before this criterion could be found met.

The applicant's TIS also does not include an adequate operational analysis of elementary school pick-up and drop-off activity. The City's traffic engineering consultant identified this as a significant unresolved issue because afternoon pick-up may generate substantial vehicle queues that could affect internal circulation, parking lot movements, adjacent streets, and nearby intersections. Additional analysis is needed to determine whether queues would interfere with parking lot circulation, backing vehicles, other driveways, pedestrian routes, emergency access routes, or access to and from Birch Lane, Vandenberg Avenue, Marcus Harris Avenue, and Arnold Avenue.

The applicant's TIS also does not adequately address the status of Birch Lane, Marcus Harris Avenue, and Vandenberg Avenue as streets identified in the adopted Transportation System Plan. The City's traffic engineering consultant noted that Birch Lane and Marcus Harris Avenue were incorrectly treated as private

streets in the TIS, although the TSP identifies them as local streets, and that Vandenberg Avenue is identified as a Minor Collector intended to connect from OR 99W to Arnold Avenue. The current record does not demonstrate that required right-of-way dedication, frontage improvements, or protection of planned street corridors have been adequately evaluated.

Campus Circulation and Access

The proposal modifies the existing campus circulation pattern. Under existing conditions, the northwest parking and circulation area serves staff and student parking and also functions as the bus and parent/guardian drop-off and pick-up area for students in grades 1–12. According to the applicant's TIS, this existing condition creates significant peak-period traffic in the northwest parking area, resulting in congestion and queuing on NE Arnold Avenue and NE Marcus Harris Avenue that could obstruct Adair Rural Fire Protection District traffic.

The proposed circulation plan relocates parent/guardian drop-off and pick-up for K–5th grades to the southeast portion of the campus via NE Birch Lane. These elementary grades are likely to generate a substantial share of parent/guardian drop-off and pick-up activity because students in grades K–5 are not of driving age and are therefore dependent on parent, guardian, bus, or other school-arranged transportation.

The City's traffic engineering consultant specifically identified the proposed K–5 pick-up and drop-off operation as requiring additional analysis. The consultant noted that the applicant's TIS does not provide a sufficient queuing analysis for the elementary school pick-up area and does not demonstrate whether the proposed design can safely accommodate a school with approximately 350 elementary students during peak pick-up operations. Using trip-generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual for a K–8 private school, the consultant found that after-school pick-up activity could create substantial vehicle queue storage demand, particularly because many parents may arrive before school release.

The submitted Proposed Circulation Plan 02 shows proposed drop-off and stacking areas for K–5th grades, 6th–8th grades, 9th–12th grades, and bus stacking/drop-off for all grades. These circulation areas are interrelated because they rely on the same campus street network, internal drive aisles, parking lot aisles, and emergency access routes. Therefore, the circulation plan must be evaluated as a coordinated campus-wide circulation system, not only as an elementary school drop-off plan.

The proposal also modifies bus circulation. Although the proposed bus loading area is located farther south and is associated with access from NE Vandenberg Avenue, buses are still proposed to enter and exit the campus using the northwest access onto NE Arnold Avenue. Proposed Circulation Plan 02 also appears to show a bus trip originating from the bus barn area, but the plan does not clearly show the corresponding bus exit movement or complete bus circulation path. The submitted materials therefore do not clearly identify the complete bus route, including entry, loading/unloading, stacking, turning movements, and exit movements.

NE Arnold Avenue is an existing public street. NE Marcus Harris Avenue, NE Vandenberg Avenue, and NE Birch Lane are planned public streets and should not be treated as school-only or parking-lot-only circulation routes. Therefore, the circulation analysis must account for their shared function, including school traffic, bus traffic, service access, pedestrian access, public street connectivity, and emergency response. NE Arnold Avenue and internal parking lot drive aisles must also be evaluated as part of the overall campus circulation system serving school traffic, bus traffic, service access, pedestrian access, and emergency response.

The proposed circulation changes are intended to separate bus and passenger vehicle movements, reduce conflicts in the northwest campus circulation area, and improve internal queue storage for parent/guardian drop-off and pick-up activity. However, the submitted plans show vehicle stacking within parking lot travel

aisles rather than within clearly designated, physically separated drop-off and pick-up lanes. This distinction is important because parking lot travel aisles must continue to serve multiple functions at the same time, including vehicle circulation, access to parking spaces, pedestrian crossings, service access, and emergency response.

Several of the proposed stacking areas also appear to overlap with or rely on drive aisles that function as shared circulation and fire access routes. If vehicles are queued in those aisles during peak drop-off or pick-up periods, the queue could limit the ability of other vehicles to circulate through the parking lot, access parking spaces, bypass delayed vehicles, or clear the area for emergency response. The plans do not clearly demonstrate whether there is adequate bypass capacity, pull-forward space, staff control, or other operational management to prevent the stacking areas from obstructing required fire apparatus access, emergency access routes, pedestrian routes, parking lot circulation aisles, or access to required parking spaces.

In addition, because portions of the proposed building are approximately 35 feet tall, the Fire Department identified aerial fire apparatus access requirements. The circulation and site improvement plans therefore must demonstrate that roads, fire lanes, parking areas, drive aisles, turning movements, and proposed stacking areas will not obstruct or interfere with required aerial apparatus access, staging, and operations.

The submitted materials also do not clearly demonstrate how parent/guardian pick-up operations will function if a vehicle near the front of a queue is waiting for a student who is not yet ready to load. Because stacking is shown within parking lot travel aisles and shared circulation areas, a delayed pick-up vehicle could prevent other queued vehicles from advancing, potentially causing queues to extend into internal drive aisles, fire access routes, NE Birch Lane, NE Vandenberg Avenue, NE Marcus Harris Avenue, or NE Arnold Avenue. The record does not identify operational controls or management measures, such as staff-directed loading, bypass capacity, pull-forward areas, or designated waiting areas, sufficient to prevent individual delayed pick-ups from obstructing circulation or emergency access.

The proposed circulation materials also do not clearly demonstrate how unobstructed emergency access to and from the Adair Rural Fire Protection District station will be maintained during school peak drop-off and pick-up periods. The Fire District station is located at 6021 NE Marcus Harris Avenue, Corvallis, Oregon 97330, on NE Marcus Harris Avenue between existing school parking/circulation areas serving the 6th–8th grade area and the proposed elementary school development area. The submitted materials do not clearly indicate how Fire District access will be protected if traffic queues occur on NE Marcus Harris Avenue, NE Vandenberg Avenue, NE Birch Lane, NE Arnold Avenue, or within internal drive aisles.

Based on these unresolved issues, the submitted materials do not demonstrate that the proposed campus circulation system will adequately protect pedestrian and vehicular safety or maintain unobstructed emergency access during peak school circulation periods. The record does not include a complete circulation and emergency access plan identifying bus entry and exit movements, parent/guardian and student drop-off and pick-up areas, stacking locations, fire access routes, emergency access clear zones, pedestrian routes, parking lot circulation aisles, bypass or pull-forward areas, and operational controls for delayed pick-up vehicles. Therefore, the record does not demonstrate that the proposed campus circulation system will protect pedestrian and vehicular safety or maintain unobstructed emergency access during peak school circulation periods. This portion of Criterion 3 has not been demonstrated to be met.

NE Marcus Harris Avenue

Existing Conditions

NE Marcus Harris Avenue currently functions as an existing private street/access route within the Santiam Christian School campus circulation system. Figure 4 of the Transportation System Plan identifies NE Marcus

Harris Avenue as a local street, and Table 7 establishes the typical roadway cross-section standards for local streets. The submitted materials indicate that the existing access easement for NE Marcus Harris Avenue is approximately 30 feet wide.

Existing NE Marcus Harris Avenue is improved with pavement only and does not include sidewalks, curb and gutter, on-street parking, or planter strips consistent with the TSP local street standard. Therefore, the existing street condition is substandard when compared to the local street standard identified in the TSP.

NE Marcus Harris Avenue also provides access to the Adair Rural Fire Protection District station at 6021 NE Marcus Harris Avenue, Corvallis, Oregon 97330. Portions of the future NE Marcus Harris Avenue alignment north of the proposed elementary school development area are not included in the applicant's proposed dedication or improvement area and include property owned by the Fire District.

Proposed Improvements

The proposal includes dedication and improvement of only a portion of NE Marcus Harris Avenue. The submitted plans show a proposed 47-foot-wide right-of-way dedication for the segment extending from south of the Fire District property to south of the NE Vandenberg Avenue intersection. The submitted typical street section for NE Marcus Harris Avenue shows approximately 28 feet of paved travel area, 5.5-foot sidewalks on both sides, 4-foot planter strips, and 12-inch curbs.

The proposed improvements appear intended to transition the affected segment of NE Marcus Harris Avenue from an existing private access condition toward a public street condition. However, the proposal does not dedicate or improve the full planned NE Marcus Harris Avenue alignment across property owned or controlled by Santiam Christian School to NE Arnold Avenue. In addition, the plan set does not denote the planned extension of NE Marcus Harris Avenue south of NE Vandenberg Avenue, as shown in the Transportation System Plan.

Required Improvements Under the TSP and City Standards

Because Figure 4 of the TSP identifies NE Marcus Harris Avenue as a local street, the applicable standard is the Local Street standard. The TSP Local Street standard requires a 55-foot minimum right-of-way, 36-foot paved surface width, two 10-foot travel lanes, two 8-foot parking lanes, planter strips, sidewalks, curb/gutter, drainage, utilities, and related improvements necessary to serve development and protect future street connectivity.

The submitted plans propose a 47-foot right-of-way dedication and approximately 28 feet of paved travel area for the affected segment of NE Marcus Harris Avenue. Although some local street elements are shown, including sidewalks, planter strips, curbs, drainage, and utilities, the proposed right-of-way and paved width are less than the TSP Local Street standard. The proposed 28-foot paved width does not provide the full paved width necessary for two travel lanes and parking on both sides as identified in the TSP Local Street standard.

Nexus and Proportionality

The nexus for requiring dedication and improvements along NE Marcus Harris Avenue is established by the proposed development's reliance on this corridor for school circulation, bus circulation, pedestrian access, service access, utility service, drainage, and emergency response. The proposal adds a new elementary school building, modifies campus circulation, changes drop-off and pick-up patterns, and continues to rely on NE Marcus Harris Avenue as a shared campus circulation, bus access, and emergency access route.

Because NE Marcus Harris Avenue is identified in the TSP as a planned local street, future right-of-way protection should extend to the full portion of the planned alignment located on property owned or controlled by Santiam Christian School, extending north to NE Arnold Avenue where the planned local street connection meets the existing public street system. The plan set should also denote and protect the planned NE Marcus

Harris Avenue extension south of NE Vandenberg Avenue, as shown in the TSP, to ensure the future street corridor is not obstructed by the proposed development. Portions of the future alignment involving Fire District-owned property may require separate coordination or future dedication, but that does not eliminate the need to protect the portion of the planned street corridor located on the applicant's property.

The required physical improvements should be distinguished from right-of-way dedication. The record supports requiring full-width street improvements for the segment of NE Marcus Harris Avenue that abuts and directly serves the proposed elementary school development area and adjacent bus fleet site, generally from south of the Adair Rural Fire Protection District property to south of the NE Vandenberg Avenue intersection. Improvement of that segment is proportional because it directly addresses the project's circulation, pedestrian access, bus circulation, utility, drainage, and emergency access impacts.

The submitted plans do not demonstrate compliance with the TSP Local Street standards for 55 feet of right-of-way and 36 feet of paved surface width. The plans also do not clearly dedicate or otherwise protect the full portion of the planned NE Marcus Harris Avenue alignment located on property owned or controlled by Santiam Christian School to NE Arnold Avenue, and do not denote or protect the planned NE Marcus Harris Avenue extension south of NE Vandenberg Avenue as shown in the TSP. Therefore, the record does not demonstrate that future street rights-of-way or required street improvements for NE Marcus Harris Avenue are adequately provided, and this portion of Criterion 3 has not been demonstrated to be met.

NE Vandenberg Avenue

Existing Conditions

NE Vandenberg Avenue currently functions as an existing private street/access route within or adjacent to the Santiam Christian School campus circulation system. Figure 4 of the Transportation System Plan identifies NE Vandenberg Avenue as a planned Minor Collector, and Table 7 establishes the typical roadway cross-section standards for minor collectors.

Existing NE Vandenberg Avenue appears to be improved with pavement only and does not include sidewalks, curb and gutter, bicycle lanes, on-street parking, or planter strips consistent with the TSP Minor Collector standard. The submitted materials also indicate that portions of NE Vandenberg Avenue are located within an existing 30-foot-wide access easement rather than a dedicated public right-of-way. Therefore, the existing street condition is substandard when compared to the planned Minor Collector standard identified in the TSP.

Proposed Improvements

The proposal includes dedication and improvement of only a portion of NE Vandenberg Avenue. The submitted plans show proposed right-of-way dedication for the segment extending from the east side of the proposed NE Marcus Harris Avenue dedication to approximately 135.35 feet west. The plans also show a proposed private street section with approximately 28 feet of paved width, a 6.5-foot sidewalk on the north side, a planter strip, and curb.

The proposed improvements appear intended to provide frontage and circulation improvements serving the elementary school development. However, the plans do not demonstrate compliance with the full TSP Minor Collector standard and do not clearly dedicate or improve the full portion of NE Vandenberg Avenue affected by or necessary to serve the proposed development.

Required Improvements Under the TSP and City Standards

Because Figure 4 of the TSP identifies NE Vandenberg Avenue as a planned Minor Collector, the applicable standard is the Minor Collector standard. The TSP Minor Collector standard requires a 66-foot minimum right-of-way, 47-foot paved surface width, two 10-foot travel lanes, bike lane/gutter elements, parking, planter

strips, sidewalks, curb/gutter, drainage, utilities, and related improvements necessary to serve development and protect future street connectivity.

The submitted plans propose only partial dedication and partial improvements. The proposed dedicated segment identifies a 58-foot right-of-way, which is less than the required 66-foot right-of-way for a Minor Collector. The proposed private street section east of the NE Marcus Harris Avenue dedication shows approximately 28 feet of paved width, which is less than the required 47-foot paved surface width for a Minor Collector. The proposed section also does not demonstrate the full paved width needed to accommodate the required travel lanes, bike lane/gutter elements, parking, and related Minor Collector improvements identified in the TSP.

Nexus and Proportionality

The nexus for requiring right-of-way dedication and physical improvements along NE Vandenberg Avenue is established by the proposed development's reliance on this corridor for campus circulation, bus circulation, parent/guardian and student access, pedestrian access, utility service, drainage, and emergency response. The proposal adds a new elementary school building, modifies campus circulation, and continues to rely on NE Vandenberg Avenue as part of the shared campus circulation and emergency access system.

Because NE Vandenberg Avenue is identified in the TSP as a planned Minor Collector, protection of the planned right-of-way is necessary to preserve the future public street corridor. Full dedication of the planned NE Vandenberg Avenue right-of-way across property owned or controlled by Santiam Christian School is proportional because it protects the planned Minor Collector corridor, supports future public street connectivity, and avoids leaving an unprotected gap in the planned street network. This is particularly important because the record does not clearly demonstrate how NE Vandenberg Avenue is intended to preserve future connectivity to Ryals Avenue east of the Santiam Christian School campus and south of NE Birch Lane, as shown in the TSP.

Physical street improvements should be distinguished from right-of-way dedication. Physical improvements may be proportional where they are limited to the segment of NE Vandenberg Avenue directly affected by or necessary to serve the proposed elementary school development. Such improvements may include pavement, curbs, planter strips, sidewalks, drainage, utilities, and related frontage improvements necessary to address the project's immediate circulation, pedestrian, utility, drainage, and emergency access impacts.

However, the submitted plans do not demonstrate compliance with the applicable TSP Minor Collector standard. The proposed dedication is less than the required 66-foot right-of-way, and the proposed paved width is less than the required 47-foot surface width. The record also does not provide City-approved findings or documentation supporting a reduced right-of-way width, reduced paved width, one-sided sidewalk improvement, or partial improvement section.

Therefore, the record does not demonstrate that future street rights-of-way or required street improvements for NE Vandenberg Avenue are adequately provided. This portion of Criterion 3 has not been demonstrated to be met.

NE Birch Lane

Existing Conditions

NE Birch Lane currently functions as an existing private street/access route within or adjacent to the Santiam Christian School campus circulation system. Figure 4 of the Transportation System Plan identifies NE Birch Lane as a planned Local Street, and Table 7 establishes the typical roadway cross-section standards for local streets.

Existing NE Birch Lane appears to be improved primarily with pavement only and does not include the full right-of-way width, sidewalks, curb and gutter, on-street parking, planter strips, drainage, utilities, and related frontage improvements required for a Local Street under the TSP. The submitted materials also do not clearly identify an access easement along NE Birch Lane sufficient to support the proposed school circulation or future public street function.

Portions of the NE Birch Lane corridor appear to abut or involve property not owned by Santiam Christian School, including property identified in Benton County tax assessor records as 7269 NE Birch Lane, Tax Lot 10430D001400, owned by Santiam Christian School Foundation, and 7295 NE Arnold Avenue, Tax Lot 104290000301, owned by Benton County. Because the submitted materials do not clearly denote an access easement, dedication area, or other legal right to use and improve NE Birch Lane, the record does not establish the applicant's ability to rely on NE Birch Lane for the proposed K-5 parent/guardian drop-off and pick-up circulation.

Proposed Improvements

The submitted plans show a proposed 26-foot paved width for NE Birch Lane. The proposed improvements appear intended to support the relocated K-5 parent/guardian drop-off and pick-up circulation and provide access to the southeast portion of the proposed elementary school development. However, the submitted plans do not clearly show dedication of right-of-way, sidewalks, curb/gutter, planter strips, on-street parking, drainage, utilities, or related public improvements along NE Birch Lane.

Required Improvements Under the TSP and City Standards

Because Figure 4 of the TSP identifies NE Birch Lane as a planned Local Street, the applicable standard is the Local Street standard. The TSP Local Street standard requires a 55-foot minimum right-of-way, 36-foot paved surface width, two 10-foot travel lanes, two 8-foot parking lanes, planter strips, sidewalks, curb/gutter, drainage, utilities, and related improvements necessary to serve development and protect future street connectivity.

The proposed 26-foot paved width is less than the required 36-foot paved surface width for a Local Street. The plans also do not demonstrate the required 55-foot right-of-way, sidewalks, curb/gutter, planter strips, on-street parking, drainage, utilities, or related public improvements needed to protect NE Birch Lane's planned Local Street function.

Nexus and Proportionality

The nexus for requiring dedication, legal access, and improvements along NE Birch Lane is established by the proposed development's reliance on this route for K-5 parent/guardian drop-off and pick-up activity, campus circulation, pedestrian access, emergency access, and access to the southeast portion of the proposed elementary school development. The proposal specifically relocates K-5 drop-off and pick-up traffic to the southeast campus area via NE Birch Lane, and the TIS states that traffic on NE Birch Lane will significantly increase.

Right-of-way dedication and physical improvements should be evaluated separately. Dedication or other legally adequate protection of the planned NE Birch Lane Local Street corridor may be proportional for the portion of the corridor located on property owned or controlled by Santiam Christian School because the proposed development relies on NE Birch Lane as a primary circulation route and because the TSP identifies NE Birch Lane as part of the planned public street network.

However, the submitted materials do not clearly demonstrate that Santiam Christian School owns or controls the full area needed for NE Birch Lane dedication, improvement, access, or maintenance. Portions of the

planned corridor appear to involve property owned by others, including the Santiam Christian School Foundation and Benton County properties identified above. Improvements or dedications involving those properties would require additional coordination, separate right-of-way acquisition, or findings demonstrating the City's authority and the proportional relationship to the current proposal.

Physical improvements along the portion of NE Birch Lane directly affected by or necessary to serve the proposed development may be proportional to the project's immediate circulation, pedestrian safety, drainage, utility, and emergency access impacts. However, the submitted plans do not demonstrate compliance with the TSP Local Street standard and do not provide City-approved findings supporting a reduced right-of-way width, reduced paved width, or omission of sidewalks, planter strips, curb and gutter, or on-street parking.

Therefore, the record does not demonstrate that legal access, future street rights-of-way, or required street improvements for NE Birch Lane are adequately provided. This portion of Criterion 3 has not been demonstrated to be met.

NE Arnold Avenue and Access Connections

Existing Conditions

NE Arnold Avenue is an existing public street that provides access to the Santiam Christian School campus and connects with existing and proposed campus circulation routes, including NE Marcus Harris Avenue and NE Birch Lane. NE Arnold Avenue serves as the existing public street connection for these campus access routes and is therefore central to evaluating traffic congestion, pedestrian safety, vehicular safety, and emergency access.

NE Marcus Harris Avenue connects to NE Arnold Avenue and also serves the Adair Rural Fire Protection District station at 6021 NE Marcus Harris Avenue. NE Birch Lane also connects to NE Arnold Avenue and is proposed to support relocated K–5 parent/guardian drop-off and pick-up circulation. The submitted materials do not clearly show the full extent of NE Birch Lane between the proposed development area and NE Arnold Avenue, including ownership, easements, access rights, improvement limits, and how the NE Birch Lane connection to NE Arnold Avenue will function during peak school circulation periods.

Benton County also identified specific concerns regarding the intersection of NE Arnold Avenue, NE Birch Lane, and future NE Vandenberg Avenue. The County noted that the existing topography and current level of improvement at the intersection may warrant a rebuild or urbanization project as an off-site improvement for the current proposal. The County also noted that the intersection is slightly superelevated, has rural sections at all four corners, lacks pedestrian amenities and crosswalks, and has known traffic control issues.

Proposed Improvements

The proposed circulation plan relies on NE Arnold Avenue as the public street connection for school access, including access via NE Marcus Harris Avenue and NE Birch Lane. The proposal also relocates K–5 parent/guardian drop-off and pick-up circulation to the southeast portion of the campus via NE Birch Lane.

However, the submitted materials do not clearly demonstrate whether the proposed reliance on NE Birch Lane will result in queuing, turning conflicts, or access conflicts at NE Arnold Avenue. The submitted circulation materials also do not demonstrate how traffic queues or internal campus circulation will be managed so that access to NE Arnold Avenue, access to and from the Fire District station, and emergency response routes remain unobstructed during peak school circulation periods.

Required Analysis and Potential Improvements

Because NE Arnold Avenue provides the existing public street connection for the campus circulation system, the record should include a complete circulation and access plan showing the full access routes to NE Arnold Avenue, including NE Birch Lane and NE Marcus Harris Avenue. The plan should identify the location and legal status of access easements, proposed improvement limits, pedestrian connections, turning movements, queue storage, emergency access routes, and operational controls needed to prevent queues from extending onto NE Arnold Avenue or blocking access to adjacent properties or emergency services.

The updated TIS should also evaluate whether improvements are needed at the NE Arnold Avenue/NE Birch Lane/future NE Vandenberg Avenue intersection to address congestion, safety, pedestrian facilities, traffic control, and the LOS F condition identified in the traffic analysis. Any required improvements to NE Arnold Avenue or the intersection should be identified through the updated TIS and coordinated with Benton County.

Conclusion

The proposal does not demonstrate that the proposed access connections to NE Arnold Avenue will avoid traffic congestion, protect pedestrian and vehicular safety, or maintain unobstructed emergency access during peak school circulation periods. The record also does not demonstrate whether improvements are needed at the NE Arnold Avenue/NE Birch Lane/future NE Vandenberg Avenue intersection to address congestion, safety, pedestrian facilities, traffic control, and the identified LOS F condition. Therefore, this portion of Criterion 3 has not been demonstrated to be met.

Pedestrian Safety

The submitted materials show pedestrian routes, parking areas, vehicle circulation aisles, parent/guardian drop-off and pick-up areas, and access connections to NE Arnold Avenue, NE Marcus Harris Avenue, NE Vandenberg Avenue, and NE Birch Lane. No on-street bicycle lanes are shown on the submitted plans. Bicycle-related roadway improvements are addressed under the street dedication and TSP improvement findings for the applicable planned street classifications, including NE Vandenberg Avenue, which is identified as a planned Minor Collector.

The primary unresolved pedestrian safety issue is that sidewalks are proposed only along portions of the development frontage. The plans do not show sidewalk improvements along the full extent of the adjacent roadways relied upon for school circulation, including NE Marcus Harris Avenue, NE Vandenberg Avenue, and NE Birch Lane. The plans also do not show a continuous internal pedestrian sidewalk connection from the proposed school building, parking areas, and drop-off areas to the adjacent public right-of-way along NE Arnold Avenue.

This is significant because the proposed elementary school will be served by a campus-wide circulation system involving existing private streets, planned public streets, parking lot drive aisles, and access connections to the public street system. Pedestrian safety cannot be evaluated only at the immediate building frontage. Students, parents/guardians, staff, buses, and vehicles will move between the proposed school, parking areas, drop-off and pick-up areas, existing campus facilities, NE Birch Lane, NE Vandenberg Avenue, NE Marcus Harris Avenue, and NE Arnold Avenue.

Without continuous sidewalks, clearly marked pedestrian routes, and safe connections to adjacent public rights-of-way, the record does not demonstrate that pedestrian circulation will be adequately separated from vehicle circulation or protected during peak school drop-off and pick-up periods. In particular, the absence of a clearly shown internal pedestrian connection to NE Arnold Avenue limits the City's ability to find that pedestrian access to the public street system is safe and complete.

The proposal does not demonstrate that pedestrian safety will be protected. The plans do not demonstrate complete sidewalk frontage improvements, a continuous internal pedestrian connection to the public right-of-way along NE Arnold Avenue, or adequate separation of pedestrian and vehicle movements throughout the campus circulation system. Therefore, this portion of Criterion 3 has not been demonstrated to be met.

Conclusion – Criterion 3

The application does not demonstrate that traffic congestion is avoided, pedestrian safety is protected, emergency access is maintained, or future street rights-of-way are adequately protected. Although the TIS concludes that analyzed public intersection approaches are expected to operate within applicable mobility standards, the record does not resolve significant issues related to campus circulation, emergency access, internal queuing, pedestrian connectivity, planned street dedication, and TSP-required street improvements, and the NE Arnold Avenue/NE Birch Lane/future NE Vandenberg Avenue intersection.

The submitted materials do not provide a complete circulation and emergency access plan demonstrating how parent/guardian drop-off and pick-up, bus circulation, parking lot stacking, internal drive aisles, pedestrian routes, and emergency access routes will function together during peak school circulation periods. The record also does not demonstrate how unobstructed access to and from the Adair Rural Fire Protection District station will be maintained if queues occur on NE Marcus Harris Avenue, NE Vandenberg Avenue, NE Birch Lane, NE Arnold Avenue, or internal campus drive aisles.

The submitted plans also do not demonstrate compliance with the applicable TSP street standards for NE Marcus Harris Avenue, NE Vandenberg Avenue, and NE Birch Lane. The plans do not demonstrate adequate right-of-way dedication, paved surface width, sidewalks, bicycle facilities where required, parking, planter strips, curbs, drainage, utilities, or related public improvements necessary to protect the planned street system. The record further does not clearly demonstrate that future street rights-of-way are protected for the portions of the planned street corridors located on property owned or controlled by Santiam Christian School, including the planned NE Marcus Harris Avenue extension south of NE Vandenberg Avenue as shown in the TSP, or how future connectivity will be preserved in accordance with the TSP.

The record also does not clearly establish the legal right to rely on NE Birch Lane for the proposed K–5 parent/guardian drop-off and pick-up circulation, including access, improvement, dedication, and maintenance where portions of the corridor may involve property outside Santiam Christian School ownership or control.

The pedestrian safety findings also identify unresolved deficiencies. Sidewalks are proposed only along portions of the development frontage, the plans do not show sidewalk improvements along the full extent of adjacent roadways relied upon for school circulation, and the plans do not show a continuous internal pedestrian sidewalk connection from the proposed school building, parking areas, and drop-off areas to the adjacent public right-of-way along NE Arnold Avenue.

Finally, the record does not demonstrate whether improvements are needed at the NE Arnold Avenue/NE Birch Lane/future NE Vandenberg Avenue intersection to address congestion, safety, pedestrian facilities, traffic control, and the identified LOS F condition. Any required improvements to NE Arnold Avenue or the intersection should be identified through the updated TIS, coordinated with Benton County, and reasonably related and proportional to the impacts of the proposed development.

Therefore, Criterion 3 has not been demonstrated to be met.

4. That proposed signs or lighting will not, by size, location or color, interfere with traffic, limit visibility or impact on adjacent properties.

Signage

The applicant has not proposed new signage as part of this Site Plan Review application. Any future signage shall require separate City review and approval under the applicable sign standards in AVDC Section 5.136.

Exterior Lighting

As discussed above under AVDC Sections 6.301(7) and 5.135, the submitted lighting information does not include fixture type, mounting height, shielding, photometric levels, or light spillover information. Without that information, the City cannot determine whether the proposed exterior lighting will comply with AVDC Sections 5.135 and 5.136 or whether lighting will interfere with traffic, limit visibility, create glare, or impact adjacent properties.

No public street lighting, exterior building-mounted lighting, or sign lighting is approved under this application. Any required street lighting shall be reviewed through revised civil plans, and any future illuminated signage shall require separate City review and approval.

Conclusion – Criterion 4

The applicant has not proposed new signage as part of this Site Plan Review application. Therefore, no signage, sign lighting, or sign-related impacts are approved under this application.

Electrical Site Plan E1.1 shows proposed exterior site lighting consisting of six parking lot lights and one 1200A MDP near the service yard. The plan does not identify exterior building-mounted lighting, public street lighting, or sign lighting. However, the record does not include fixture type, mounting height, shielding, photometric levels, or light spillover information.

Without this information, the City cannot determine whether the proposed exterior lighting will be arranged so as not to face directly into oncoming traffic or adjacent residences, create glare, interfere with visibility, or impact adjacent properties. Therefore, Criterion 4 has not been demonstrated to be met.

5. That adequate water, sewage disposal system and utilities for the proposed use are available.

Applicable Utility Standards

AVDC Section 4.141(4)(a) requires each E-1 site to be adequately served by public utilities, including municipal water and sewer service. AVDC Section 5.127 requires proposed water plans and systems to be approved by the City and requires public water line extensions, fire hydrants, mains, and related appurtenances where needed. AVDC Section 5.128 requires proposed sanitary sewer plans and systems to be approved by the City and requires new development to extend and connect to the public sewer system when service is available. AVDC Sections 5.129 and 5.130 address utilities and require utility easements for sewers, water mains, and public or private utilities necessary to provide full service to development.

AVDC Article 8 and the City's Public Infrastructure Design Standards Manual also require public improvements and connections to public facilities to conform to the Development Code, City design standards, and City construction specifications.

These standards require the applicant to demonstrate that adequate water service, sanitary sewer service, fire flow, utility connections, and required easements are available or can be provided to serve the proposed development. The submitted utility materials, including Sheet C251, Sheet C250, and Exhibit H, Attachments G and G-1, identify existing and proposed utility improvements intended to serve the replacement elementary school. However, the plans do not clearly show the full extent of the subject property, adjacent public facilities, all final utility connection points, capacity information, or all required utility, access, and maintenance easements.

Water Service and Fire Flow

The applicant's utility plans, including Sheet C251, Overall Site Utility Plan, Sheet C250, Sanitary and Water Plan, and Exhibit H, Attachments G and G-1, identify proposed water service and utility improvements intended to serve the new elementary school building and associated site improvements. However, the plans do not clearly show the full extent of the subject property, all adjacent public facilities, off-site connection points, or final water service connections.

Because the proposed use is an elementary school, adequate water service includes domestic water service, fire flow, hydrant access, fire protection facilities, and connection to existing public water facilities. The record does not clearly demonstrate water system capacity, fire flow availability, hydrant location and access, fire lane protection, gate access, Fire Department Connection location, or whether additional hydrants or water system improvements are needed.

The Fire Department identified a required fire flow of 1,500 gallons per minute for four hours based on the current building design. The Fire Department also noted that the required fire flow may be reduced to 1,000 gallons per minute for four hours if approved fire walls or fire barriers are added to separate different areas of the building, subject to building and fire code review. The Fire Department requested that the Fire Department Connection be located at the southeast corner of the site to provide access to a second hydrant to support the sprinkler system.

The applicant would need to submit revised utility plans or supporting documentation demonstrating adequate water service, fire flow, hydrant access, fire protection facilities, Fire Department Connection location, and connection to existing public water facilities before this criterion could be found satisfied. Final review would also require coordination with the City, Adair Rural Fire Protection District, and applicable building/fire officials.

Sanitary Sewer Service

The applicant's utility plans, including Sheet C251, Overall Site Utility Plan, Sheet C250, Sanitary and Water Plan, and Exhibit H, Attachments G and G-1, identify sanitary sewer facilities and utility improvements intended to serve the replacement elementary school and associated campus improvements. The proposal does not rely on an on-site sewage disposal system.

However, the record does not clearly confirm the sanitary sewer connection location, capacity, alignment, required easements, or relationship to existing public sewer facilities. The applicant would need to submit revised utility plans or supporting documentation confirming sanitary sewer service before this criterion could be found satisfied.

Storm Drainage and Related Utilities

The submitted plans and stormwater materials identify proposed stormwater collection, detention, water quality treatment, conveyance, outfall, and discharge facilities. Detailed findings regarding storm drainage and drainage facilities are provided under Criterion 6.

Franchise and Other Utilities

The applicant's utility plans identify utility improvements intended to serve the replacement elementary school, parking areas, lighting, stormwater facilities, and related site improvements. However, the record does not fully demonstrate that all required franchise and private utility services have been coordinated or can be installed consistent with City standards and provider requirements. The applicant would need to submit revised utility plans or supporting documentation confirming franchise utility coordination, facility locations, easement needs, and service connections before this criterion could be found satisfied.

Utility Easements and Maintenance Access

Adequate utility service requires recorded easements for construction, access, inspection, maintenance, repair, and replacement of water, sewer, stormwater, franchise utility, and fire protection facilities. AVDC Section 5.130 requires utility easements for sewers, water mains, and public or private utilities necessary to provide full service to development.

The submitted plans do not clearly identify all utility, drainage, access, and maintenance easements needed to serve the proposed development and maintain utility infrastructure. The applicant would need to submit revised utility plans and supporting documentation identifying all required water, sewer, stormwater, franchise utility, fire protection, access, and maintenance easements before this criterion could be found satisfied.

Conclusion – Criterion 5

The applicant's plans indicate that municipal water, sanitary sewer, and utility facilities are proposed to serve the development. However, the record does not clearly demonstrate all final utility connections, capacity information, required easements, fire flow, hydrant access, Fire Department Connection location, or relationship to existing public facilities.

Therefore, based on the current record, Criterion 5 has not been demonstrated to be met. The applicant would need to submit revised utility plans and supporting information demonstrating adequate water service, sanitary sewer service, utility connections, capacity, easements, fire flow, hydrant access, Fire Department Connection location, and compliance with City public improvement standards, utility provider requirements, and applicable building/fire code requirements before this criterion could be found satisfied.

6. That drainage-ways are protected and drainage facilities provided.

Applicable Drainage Standards

AVDC Section 5.126 requires property owners to provide proper drainage and protect runoff and drainageways from disruption or contamination. The Code requires proposed storm drainage system design plans to be approved by the City and requires surface water drainage patterns and proposed storm drainage facilities to be shown on development plans. AVDC Section 5.126 also requires storm drainage design to accommodate upstream runoff and downstream impacts. Off-site improvements are required where necessary to serve the development and protect downstream drainage facilities.

AVDC Article 8 also applies to required public improvements and connections to public facilities, including drainage facilities and related infrastructure. The City's Public Infrastructure Design Standards Manual requires stormwater and detention facilities for new development; requires storm drainage improvements to detain increased runoff and convey existing off-site surface water entering the site; requires hydrology and detention calculations to be submitted to the City Engineer; and requires the applicant to account for surface and stormwater drainage from the point of origin to the ultimate point of discharge. The Manual also requires downstream impacts to be identified and requires detention or downstream improvements where needed to avoid exceeding downstream system capacity.

Existing Drainage Conditions

The applicant submitted a Stormwater Report for Santiam Christian Elementary School prepared by Devco Engineering. The report states that the project site is located within the Santiam Christian School campus and that the stormwater basin analyzed in the report encompasses approximately 29.79 acres. The project site is generally bounded by NE Vandenberg Avenue, NE Marcus Harris Avenue, and NE Arnold Avenue.

The report states that the northern portion of the basin, located north of NE Vandenberg Avenue, contains most of the proposed improvements and currently consists primarily of impervious surfaces, including asphalt and gravel parking areas, driveways, play structures, and small buildings. The report states that no existing stormwater detention facilities are present in this area. The southern portion of the basin includes an existing synthetic turf baseball field and undeveloped grassy and shrubby areas, with stormwater flowing generally west to east as sheet flow and shallow, undefined concentrated flow before leaving the site.

Proposed Stormwater Facilities

The submitted drainage, grading, and utility plans identify proposed grading, stormwater collection, conveyance, detention, water quality treatment, and discharge facilities for the development area. The relevant drainage-related plan sheets include:

The submitted drainage-related plan sheets, all dated January 29, 2026, include the west and east site grading plans (Sheets C231 and C232), sanitary/water and overall stormwater utility plans (Sheets C250 and C251), street and storm drainage plan/profile sheets for NE Marcus Harris Avenue and NE Vandenberg Avenue (Sheets C252 through C254), pond outlet and offsite storm drainage plan/profile sheets (Sheets C255 through C257), and the parking lot storm drainage plan (Sheet C258).

Sheets C231 and C232 show proposed site grading and drainage patterns. Sheets C250 and C251 identify related sanitary, water, utility, and storm drainage improvements serving the proposed development. Sheets C252 through C258 provide storm drainage plan and profile information for the affected street frontages, pond outlet, offsite storm drainage improvements, and parking lot drainage system.

The Stormwater Report states that proposed improvements include the new school building, associated private parking and access drives, public extensions of NE Marcus Harris Avenue and NE Vandenberg Avenue, and a new combination dry pond located along the eastern boundary of the property. The report states that the dry pond has been sized to accommodate both the proposed development and future development of synthetic turf sports fields. The Stormwater Report identifies 6.103 acres of new impervious area and accounts for 7.117 acres of future impervious area.

Stormwater Quantity and Detention

The Stormwater Report uses the Santa Barbara Urban Hydrograph method through HydroCAD to model runoff. The report states that the site consists of hydrologic group D soils and that infiltration is not considered for the design.

For the 25-year storm, the report identifies a historic discharge rate of 9.89 cfs, a proposed pre-detention discharge rate of 25.14 cfs, and a proposed detained discharge rate of 9.63 cfs. For the 100-year storm, the report identifies a historic discharge rate of 14.60 cfs, a proposed pre-detention discharge rate of 32.24 cfs, and a proposed detained discharge rate of 13.27 cfs. Based on these calculations, the proposed detention facility reduces post-development peak discharge rates to below the modeled historic discharge rates for the 25-year and 100-year storm events.

Stormwater Quality

The Stormwater Report states that Benton County stormwater quality standards are used for water quality review and require treatment of runoff from one-half of the 2-year, 24-hour storm event when more than 10,890 square feet of new impervious surface are created. The report states that the proposed dry pond is designed to temporarily store stormwater and release the water quality design volume through an underdrain system after filtration through underlying soil media. The report further states that the proposed facility is sized to fully route the water quality storm volume through the underdrain system.

Drainageway Protection and Downstream Impacts

The proposed drainage system is intended to collect, detain, treat, and discharge stormwater in a controlled manner. The proposed dry pond, outlet control structure, overflow system, conveyance facilities, and level flow spreader are intended to reduce peak runoff rates, provide water quality treatment, and maintain a sheet-flow discharge condition similar to existing drainage patterns.

Final civil plans must confirm that the grading, drainage, stormwater conveyance, utility, pond outlet, offsite storm, and parking lot drainage improvements shown on Sheets C231, C232, and C250 through C258 are consistent with the approved Stormwater Report and do not adversely affect adjacent properties, public or private streets, downstream drainage facilities, or drainageways.

NPDES and Construction Erosion Control

AVDC Section 5.126(8) requires a National Pollutant Discharge Elimination System permit from DEQ for construction activities requiring permitting. The City's Public Infrastructure Design Standards Manual also recognizes that other agencies, including DEQ, may require separate drainage or water quality review and that the applicant must coordinate with those agencies and provide relevant approval or review documentation to the City. The Manual further requires construction activities to protect roads, ditches, excavations, embankments, stockpiles, and waste areas, and to employ dust control measures as required by the City.

Because the proposal includes substantial grading, new impervious surface, stormwater conveyance, and construction of a new dry pond and outfall system, the applicant must obtain any required DEQ NPDES construction stormwater permit, including a 1200-C permit if applicable, before ground-disturbing construction activity. Final civil plans must include erosion and sediment control measures sufficient to prevent sediment, construction debris, or pollutants from entering streets, drainageways, downstream conveyance facilities, or adjacent properties during construction.

Maintenance and Easements

Long-term maintenance of the proposed dry pond, outlet control structure, underdrain system, flow spreader, conveyance facilities, and related stormwater infrastructure is necessary to ensure continued function. The City's drainage standards require long-term maintenance responsibility and access for cleaning, inspection, personnel, and equipment to be addressed as part of the drainage review.

Final approval should require all necessary drainage easements, access easements, and maintenance obligations to be reviewed and approved by the City and recorded, as applicable, before final civil plan approval, building permit issuance, or occupancy.

Conclusion – Criterion 6

The submitted Stormwater Report and drainage-related plans, including Sheets C231, C232, and C250 through C258, dated January 29, 2026, identify proposed stormwater collection, detention, water quality treatment, conveyance, outfall, and discharge facilities. The Stormwater Report demonstrates that the proposed dry pond is designed to reduce the 25-year and 100-year post-development discharge rates to below modeled historic discharge rates and to provide water quality treatment for the required storm event.

Based on the current record, stormwater and drainage do not appear to be the primary basis for denial. However, if the application is continued or resubmitted, final drainage review would need to confirm consistency with Sheets C231, C232, and C250 through C258 and the Stormwater Report; construction of approved stormwater facilities; provision of required drainage, access, and maintenance easements; long-term maintenance of the stormwater system; and compliance with applicable DEQ NPDES construction stormwater permitting and erosion control requirements.

7. 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.

Findings:

The proposed development is a replacement elementary school and related campus improvements within the E-1 Educational Facilities District. The proposal continues the existing educational use of the Santiam Christian School campus and does not introduce an industrial, commercial, or other use with inherent emissions or nuisance characteristics that would be incompatible with the E-1 zone.

Potential nuisance characteristics primarily relate to traffic, queuing, parking, circulation, lighting, stormwater, construction activity, service/loading areas, waste collection, and mechanical equipment. Typical school-related activity, including student arrival and dismissal, outdoor play, school events, deliveries, and maintenance, is generally expected in this zoning district and campus context.

Traffic, parking, queuing, pedestrian safety, and emergency access are addressed in detail under Criteria 2 and 3. As discussed in those sections, the record does not demonstrate that the proposed circulation system will adequately protect pedestrian and vehicular safety, maintain unobstructed emergency access, or protect future street rights-of-way. Because those issues remain unresolved, the record does not demonstrate that traffic, parking, queuing, and circulation-related nuisance impacts are compatible with adjacent uses or adequately mitigated.

Exterior lighting is addressed under Criteria 2 and 4. The submitted plans identify proposed exterior site lighting, but the record does not include fixture type, mounting height, shielding, photometric levels, or light spillover information. Therefore, lighting and glare impacts have not been fully demonstrated to be mitigated.

Stormwater and drainage are addressed under Criterion 6. Construction-related impacts, including dust, erosion, sedimentation, construction traffic, and temporary noise, are regulated through applicable City construction standards, erosion control requirements, public works permits, and any required state or local permits.

Service, delivery, loading, waste collection, and mechanical equipment are accessory to the school use and must be located, screened, and operated consistent with the final approved plans and applicable City standards. Utility and fire-flow issues are addressed under Criterion 5.

Conclusion – Criterion 7

The proposed elementary school use is generally compatible with the E-1 zone and nearby public, semi-public, institutional, recreational, and open space uses. However, as discussed under Criteria 2, 3, 4, 5, and 6, the current record does not fully demonstrate compliance with applicable parking, landscaping, buffering, lighting, circulation, emergency access, pedestrian connectivity, utility, fire-flow, stormwater, TSP street dedication, and public improvement requirements.

Because those issues remain unresolved, the record does not demonstrate that all traffic, parking, circulation, lighting, utility, stormwater, and emergency-access-related nuisance characteristics are compatible with the land use zone and adjacent uses. Therefore, Criterion 7 has not been demonstrated to be met based on the current record.

8. 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.

Findings:

The proposed development continues the existing educational use of the Santiam Christian School campus and is generally consistent with the purpose of the E-1 Educational Facilities District. The surrounding area

includes educational, public, semi-public, institutional, recreational, open space, public safety, and residentially zoned properties. The proposed elementary school use and general building scale are compatible with the E-1 zone and the existing campus context.

However, compatibility also depends on whether the site design, circulation system, public facilities, and mitigation measures adequately address the impacts of the proposed development. As discussed under Criteria 2, 3, 4, 5, and 6, the current record does not fully demonstrate compliance with applicable parking, landscaping, buffering, lighting, circulation, emergency access, pedestrian connectivity, utility, fire-flow, stormwater, TSP street dedication, and public improvement requirements.

Transportation, access, and emergency response are addressed in detail under Criterion 3. The proposal changes school circulation, relocates parent/guardian drop-off and pick-up activity, increases use of NE Birch Lane, continues reliance on NE Marcus Harris Avenue and NE Vandenberg Avenue, and affects access to the Adair Rural Fire Protection District station. The record does not demonstrate that the circulation system will operate safely during peak school periods, that emergency access will remain unobstructed, or that the proposed street dedications and improvements adequately protect the planned street network identified in the TSP.

Parking, landscaping, buffering, fencing, screening, lighting, utilities, fire protection, and stormwater are addressed under Criteria 2, 4, 5, and 6. As discussed in those sections, the record does not fully demonstrate compliance with parking-count requirements; parking lot landscaping, buffering, screening, and curbing standards; lighting and photometric requirements; utility capacity and easements; fire flow and hydrant access; or stormwater and drainage requirements.

Some impacts may be capable of being addressed through revised plans, additional technical information, or future permit review. However, without that information, the City cannot determine that the characteristics of the proposed development are compatible with the surrounding area or that potential impacts have been mitigated to the maximum extent possible.

Conclusion – Criterion 8

The proposed educational use and general building scale are compatible with the E-1 zone and the existing Santiam Christian School campus. However, the current record does not demonstrate that all characteristics of the proposed development are compatible with the surrounding area or that potential impacts have been mitigated to the maximum extent possible.

Specifically, the submitted materials do not demonstrate compliance with parking-count requirements; parking lot landscaping, buffering, screening, and curbing standards; pedestrian connectivity requirements; campus circulation and queuing requirements; emergency access protections; lighting and photometric requirements; utility and fire-flow requirements; stormwater requirements; and TSP street dedication and public improvement standards. Therefore, Criterion 8 has not been demonstrated to be met based on the current record.

CONCLUSION

Based on the foregoing findings, staff concludes that the proposed Site Plan Review does not demonstrate compliance with all applicable approval criteria.

Specifically, the application does not demonstrate compliance with AVDC Section 2.400(2), including Criteria 1, 2, 3, 4, 5, 7, and 8. The unresolved issues include parking-count compliance, parking lot landscaping, buffering, screening, and curbing; setback information; lighting and photometric information; campus circulation; pick-up and drop-off queuing; emergency access; pedestrian and bicycle connectivity; street dedication; frontage

improvements; TIS deficiencies; utility connections and capacity; fire flow; hydrant access; Fire Department Connection location; aerial apparatus access; utility easements; and compliance with applicable Transportation System Plan and public improvement standards.

Because staff recommends denial, no conditions of approval are recommended. If the Planning Commission elects to continue the matter or allow the applicant to submit revised materials, the applicant should address the unresolved items identified in this staff report.

Therefore, staff recommends that the Planning Commission deny File No. SPR-26-01 based on the findings in this staff report.

RECOMMENDATION

Based on the current record, staff recommends that the Planning Commission deny File No. SPR-26-01 because the applicant has not demonstrated compliance with all applicable approval criteria, including Criteria 1, 2, 3, 4, 5, 7, and 8 of AVDC Section 2.400(2).

PLANNING COMMISSION MOTIONS

Recommended Motion for Denial

- “I move to deny Santiam Christian Elementary School / SPR-26-01, based on the findings and conclusions in the staff report, which determine that the application does not satisfy the applicable approval criteria, and direct staff to prepare a written denial decision consistent with the staff report and Planning Commission deliberations.”

Alternate Motion for Continuance

- “I move to continue the limited land use review for Santiam Christian Elementary School / SPR-26-01 to [date/time] at [location], for the purpose of [state reason, such as allowing additional review of the record, obtaining clarification, or preparing revised findings/conditions].”

Alternate Motion for Approval

- “I move to approve Santiam Christian Elementary School / SPR-26-01, based on the Planning Commission’s determination that the application satisfies the applicable approval criteria, specifically [identify criteria and reasons], and subject to the conditions of approval stated by the Planning Commission.”

EXHIBITS

- A. Exhibit A: Site Plan Review Application Form, dated November 5, 2025.
- B. Exhibit B: Santiam Christian Elementary School Site Circulation Plan, dated September 19, 2025.
- C. Exhibit C: Santiam Christian Elementary School Land Use Drawings, dated October 13, 2025.
- D. Exhibit D: Stormwater Calculations for Santiam Christian Elementary School, Devco Job No. 23449, dated October 2025.
- E. Exhibit E: Applicant's Traffic Impact Study, prepared by Clemow & Associates, dated January 26, 2026.
- F. Exhibit F: Santiam Christian Elementary School Revised Drawings Combined, dated January 29, 2026.
- G. Exhibit G: Santiam Christian Elementary School Site Plan Review Incompleteness Response, dated January 29, 2026.
- H. Exhibit H: Santiam Christian Elementary School Civil Site Plan Review Attachments, dated February 25, 2026.
- I. Exhibit I: Santiam Christian Elementary School Architectural Site Plan Review Drawings, dated February 25, 2026.
- J. Exhibit J: Santiam Christian Elementary School Site Plan Review Completeness Review Second Response, dated March 2, 2026.
- K. Exhibit K: Revised Stormwater Calculations for Santiam Christian Elementary School, Devco Job No. 23449, dated March 2026.
- L. Exhibit L: Title Report and Vesting Deed materials for 7220 NE Arnold Avenue.
- M. Exhibit M: Applicant's Revised Final Traffic Impact Study with Attachments, prepared by Clemow & Associates, dated January 26, 2026, revised April 15, 2026.
- N. Exhibit N: City Traffic Engineering Consultant Review Memorandum, Ferguson & Associates, Inc., dated June 10, 2026.
- O. Exhibit O: Agency comments, including comments from Adair Village Rural Fire Department after coordination with the Oregon State Fire Marshal's Office.
- P. Exhibit P: City Engineering Review Comments from Verdantas/Civil West Engineering Services, dated June 11, 2026.