



An Employee Owned Company

PROJECT NARRATIVE FOR

Proposed New Grocery Store

Woodburn, Oregon

An Application For:
Type III Design Review

Submitted:
November 6, 2025

Applicant:
WinCo Foods, LLC

Prepared by:
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INTRODUCTION

Proposed Project: New 84,087 sf Grocery Store.

Proposed Project Location: Undeveloped land between Stacey Allison Way and Evergreen Road and southwest of Center Street in Woodburn, Oregon.
Physical address not yet assigned.

Tax Lot(s): 052W12C002100 & portion of 052W12C002200
(Lot 11 and portion of Lot 12, Town Center at Woodburn)
Property Line Adjustment required.

Current Zoning: Commercial General - CG
Allowed Use - No rezoning required.

Project Applicant/Owner: WinCo Foods, LLC
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Boise, ID 83704

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PROJECT SUMMARY

Project Description

WinCo Foods LLC is an Employee-Owned supermarket chain based in Boise, Idaho. They pride themselves on low prices and quality goods and service. WinCo opened their first Distribution Center in Woodburn, Oregon in 1998 and has since successfully expanded throughout much of the western U.S. and into the midwestern states of Texas and Oklahoma. After many years of successfully operating the distribution center in Woodburn, WinCo would like to build and operate a grocery store here as well. The new store would be located on unimproved land directly across Interstate 5 (I-5) from the distribution center.

The proposed grocery store building would be 84,087 square feet. It would offer all of the usual supermarket items including fresh produce, dry and canned goods, beer, wine, baked items and Service Meat, Deli, and Seafood departments. Freshly cooked pizza and hundreds of bulk items available by the pound would also be available. The store would be open around the clock, seven days per week.

Site Description

The proposed WinCo Foods store site will be a newly formed lot of roughly 10.6 acres or 461,857 square feet. The lot slopes down slightly from north to south with the northern corner roughly three feet lower than the southern east-west boundary bordering the Cascade Meadow Apartments. It is bordered to the south by the apartments, to the southeast by Evergreen Road and single-family residential properties across Evergreen, to the northeast by undeveloped, commercial property, to the northwest by Stacey Allison Way and I-5 and to the southwest by additional vacant commercial land. The site is covered by grass vegetation and void of trees. Photos of the site as it exists can be found in Exhibit 'B.'

Project Schedule

The project is proposed to be permitted in 2026, begin construction in late 2026 or early 2027 and open in mid to late 2027.

APPLICABLE WOODBURN DEVELOPMENT ORDINANCE PROVISIONS

VOLUME 2: LAND USE ZONING AND SPECIFIED USE STANDARDS

2.01 General Provisions (Code sections that do not apply to the proposed project have been omitted)

Zoning seeks to group like uses together, to separate incompatible uses, and to allow a wide range of land uses in appropriate environments and with appropriate regulations. The zones are depicted on the Official Zoning Map. This Section sets forth the regulations for each zone in the City.

Response: The subject property is within the CG – Commercial General zone as shown on the City of Woodburn zoning map. This narrative will address all applicable development regulations pertaining to the CG zone.

2.03 Commercial Zones (Code sections that do not apply to the proposed project have been omitted)

A. The City of Woodburn is divided into the following commercial zones:

- 2. The Commercial General (CG) zone is the community's primary commercial area, providing for businesses requiring extensive land intensive outdoor storage and display of merchandise, equipment, or inventory.**

B. Approval Types (Table 2.03A)

- 3. Permitted Uses (P) are allowed outright, subject to the general development standards of this Ordinance.**

Table 2.03A

Uses Allowed in Commercial Zones Table 2.03A	
Use	Zone

Accessory Uses (A) Conditional Uses (CU) Permitted Uses (P) Special Permitted Uses (S) Specific Conditional Uses (SCU)		DDC	CG	CO	MUV	NNC

B	Commercial Retail and Services					
3	Bakeries, delicatessens, grocery and convenience stores	P ⁷	P		P	

<p>***</p> <p>7. Drive-throughs are not allowed</p> <p>***</p>						

Response: The proposed WinCo Foods supermarket is permitted outright as a grocery store within the CG zone. The store will not have a drive-through.

Table 2.03C

Commercial General (CG) - Site Development Standards Table 2.03C			
Lot Area, Minimum (square feet)			No minimum
Lot Width, Minimum (feet)			No minimum
Lot Depth, Minimum (feet)			No minimum
Street Frontage, Minimum (feet)			No minimum
Front Setback and Setback Abutting a Street, Minimum (feet)			5 ¹
Side or Rear Setback, Minimum (feet)	Abutting RS, R1S, or RM zone		10 ⁴
	Abutting CO, CG, DDC, NNC, P/SP, IP, SWIR, or IL zone		0 or 5 ^{4, 5}
Setback to a Private Access Easement, Minimum (feet)			1
Lot Coverage, Maximum			Not specified ²

Building Height,	Primary or accessory	Outside Gateway subarea	70
		Western Gateway subarea	50

Maximum (feet)	structure	Eastern Gateway subarea	40
	Features not used for habitation		100
1. Measured from the Street Widening Setback (Section 3.03.02), if any			
2. Lot coverage is limited by setbacks, off-street parking, and landscaping requirements.			

5. building may be constructed at the property line, or shall be set back at least five feet.			

Response: The proposed project design provides 5-foot setbacks along both Stacey Allison Way and Evergreen Road. It provides a 10-foot setback along the RMN - Nodal Medium Density Residential zone (Cascade Meadow Apartments) to the south. The proposed site is outside the Gateway subarea, so the allowable building height is 70-feet. The proposed building height is 42-feet.

2.05 Overlay Districts (Code sections that do not apply to the proposed project have been omitted)

2.05.02 Interchange Management Area Overlay District

A. Purpose

The purpose of the Interchange Management Area Overlay District (IMA) is to preserve the long-term capacity of the I-5/Highway 214 Interchange. Preserving the capacity of the interchange is essential for the City's future. Continued access to I-5 is critical for existing businesses and for attracting new businesses and development to the community.

The IMA complements the provisions of the Southwest Industrial Reserve (SWIR) Zoning District by ensuring that industrial land is retained for the development envisioned in the Woodburn Comprehensive Plan. The IMA also ensures that needed industrial, commercial and residential lands within the IMA are protected from incompatible development generating excessive vehicle trips.

The vehicle trip budget (Table 2.05A) identifies by parcel the maximum amount of peak hour trips for each parcel within the IMA and is intended to be high enough to accommodate peak hour trips anticipated by the Woodburn Comprehensive Plan and the Transportation Systems Plan (TSP), but low enough to restrict unplanned vehicle trips that could adversely affect the I-5/Hwy 214 Interchange.

B. Applicability

The provisions of this Section apply to all Type II – V land use applications that propose to allow development that will generate more than 20 peak hour vehicle trips (based on the latest Institute of Transportation Engineers Trip Generation Manual) on parcels identified in Table 2.05A. The provisions of Section 2.05.02F apply to all properties within the boundary of the IMA.

C. Vehicle Trip Budgets

This Section establishes a total peak hour trip generation budget for planned employment (commercial and industrial) land uses within the IMA.

1. The IMA trip budget for vacant commercial and industrial parcels identified in Table 2.05A is 2,500 peak hour vehicle trips. An estimated 1,500 additional peak hour residential trips are planned within the IMA. The IMA vehicle trip budget is allocated to parcels identified in Table 2.05A on a first-developed, first-served basis.
2. Parcel budgets are based on 11 peak hour trips per developed industrial acre, and 33 peak hour trips per developed commercial acre.
3. The parcel budget for each parcel will be reduced in proportion to actual peak hour vehicle trips generated by new development on any portion of the parcel.
4. The City may allow development that exceeds the parcel budget for any parcel in accordance with this Section.

Table 2.05A

Vehicle Trip Budget by Parcel (Parcel Budget) Table 2.05A				

K	052W12C 02100	Commercial	7	231
	052W12C 02200		6	198
	052W13 01600		5	165
	052W14 02300		6	198

D. Administration

This Section delineates responsibilities of the City and ODOT to monitor and evaluate vehicle trip generation impacts on the I-5 interchange from development approved under this Section.

1. TIA: In addition to Section 3.04.05, the following applies: A Transportation Impact Analysis (TIA) is required for all land use applications subject to the provisions of this Section. The TIA must meet City and ODOT administrative rule (OAR Chapter 734, Division 51) requirements and shall include an evaluation and recommendation of feasible Transportation Demand Management (TDM)

measures that will minimize peak hour vehicle trips generated by the proposed development.

2. For a land use application subject to the provisions of this Section:

- a. The City shall not deem the land use application complete unless it includes a TIA prepared in accordance with TIA Requirements;
- b. The City shall provide written notification to ODOT when the application is deemed complete. This notice shall include an invitation to ODOT to participate in the City's review process;
- c. ODOT shall have at least 20 days to provide written comments to the City, measured from the date the completion notice was mailed. If ODOT does not provide written comments during this 20-day period, the City's decision may be issued without consideration of ODOT comments.

3. The details of City and ODOT monitoring and coordination responsibilities are found in the Woodburn – ODOT Intergovernmental Agreement (IGA).

- a. The City shall be responsible for maintaining a current ledger documenting the cumulative peak hour trip generation impact from development approved under this Section, compared with the IMA trip budget.
- b. The City may adjust the ledger based on actual development and employment data, subject to review and concurrence by ODOT.
- c. The City will provide written notification to ODOT when land use applications approved under this Section, combined with approved building permits, result in traffic generation estimates that exceed 33% and 67% of the IMA trip budget.

4. This Section recognizes that vehicle trip allocations may become scarce towards the end of the planning period, as the I-5 Interchange nears capacity. The following rules apply to allocations of vehicle trips against the IMA trip budget:

- a. Vehicle trip allocations are vested at the time of design review approval.
- b. Vehicle trips shall not be allocated based solely on approval of a comprehensive plan amendment or zone change, unless consolidated with a subdivision or design review application.
- c. Vesting of vehicle trip allocations shall expire at the same time as the development decision expires.

E. Allowed Uses

Uses allowed in the underlying zoning district are allowed, subject to other applicable provisions of the Woodburn Development Ordinance and this Section.

F. Comprehensive Plan and Zoning Map Amendments

1. The provisions of this Section (2.05.02.F) apply to all Comprehensive Plan Map amendments within the IMA. This Section does not apply to Zoning Map amendments that result in conformance with the applicable Comprehensive Plan Map designation, such as Zoning Map amendments that occur when land is annexed to the City.
2. Applications for Comprehensive Plan Map amendments and for Zoning Map amendments shall determine whether the proposed change will significantly affect a collector or arterial transportation facility.

3. To ensure that the remaining capacity of the I-5 Interchange is reserved for targeted employment opportunities and needed housing, this section imposes the following prohibitions on Comprehensive Plan Map amendments within the IMA:
 - a. Comprehensive Plan Map amendments that will increase the net commercial land area within the IMA shall be prohibited.
 - b. Comprehensive Plan Map amendments that allow land uses that will generate traffic in excess of the IMA trip budget shall be prohibited.

G. Interchange Capacity Preservation Standards

Land use applications subject to the provisions of this Section shall comply with the following:

1. Peak hour vehicle trips generated by the proposed development shall not, in combination with other approved developments subject to this Section, exceed the IMA trip budget of 2,500.
2. Peak hour vehicle trips generated by the proposed development shall not exceed the maximum peak hour vehicle trips specified in Table 2.05A for the subject parcel, except:
 - a. Development may be allowed to exceed the maximum, if the development will contribute substantially to the economic objectives found in the Comprehensive Plan.
 - b. Residential development on a parcel zoned Commercial shall be allowed to exceed the maximum.
3. Transportation Demand Management (TDM) measures shall be required to minimize peak hour vehicle trips and shall be subject to annual review by the City.

Response: The site is within Subarea K of the Interchange Management Area Overlay District as outlined in WDO 2.05.02. The Applicant has provided a full Traffic Impact Analysis (TIA) and incorporated a Transportation Demand Management (TDM) section for review by the City and ODOT. The TIA also addresses the Interchange Management Area Overlay District.

2.06 Accessory Structures (Code sections that do not apply to the proposed project have been omitted)

2.06.01 Applicability

The following standards are applicable to accessory structures in all zones. Accessory Dwelling Units are exempt from these standards and are subject to the provisions of Section 2.07.20.

2.06.02 Fences and Walls

C. Height in Non-Residential Zones

1. In commercial, industrial, or public zones, the maximum height of a fence or wall located in a yard abutting a street shall be 6 feet, relative to the ground elevation under the fence or wall. Fence height may increase to 9 feet once flush with the building face, or 20 feet from street right-of-way.
2. Fences and walls may be constructed in the Street Widening Setback provided the property owner agrees to removal at such time as street improvements are made.

D. Fence Materials

1. **Materials:** Fences and walls shall be constructed of any materials commonly used in the construction of fences and walls, such as wood, stone, rock, or brick, or other durable materials.
2. **Coating and slats:** Chain link fences are acceptable as long as the fence is coated and includes slats made of vinyl, wood or other durable material. Chain link fence in a residential zone, except where part of refuse and recycling collection facility gates, is exempt from the slats requirement. Slats may not be required when visibility into features such as open space, natural areas, parks and similar areas is needed to assure visual security, or into on-site areas in industrial zones that require visual surveillance.

4. **Prohibition:** A fence constructed of materials that could cause bodily harm, including, but not limited to, those conveying electric current, barbed wire, razor wire, spikes and broken glass, is prohibited.

2.06.03 Structures

- A. **Accessory structures attached to a primary building shall be considered as a portion of the primary building and subject to the same requirements as the primary building.**
- B. **The minimum separation between detached accessory structures and the primary building shall be six feet.**

Response: The proposed project includes coated chain link fencing with vinyl slats in the following three locations: 1. A 42-inch-high fence at the southwest side of the Truck Dock for fall protection along the top of the dock retaining wall. 2. A 72-inch-high (6-feet) fence at the Covered Deck on the southwest side of the building connected to the Truck Dock to provide security and screening. This fence is flush with the building face. 3. A 42-inch-high fence along the southeast and northeast sides of the Compactor Dock also for fall protection. These fences are all well over 20-feet from the street rights-of-way and the proposed heights and materials are allowed per WDO 2.06.02. The Generator Enclosure walls are 12-feet, 6-inches high and are attached to the building. These walls as well as the Covered Deck roof structure meet the requirements of WDO 2.06.03 as accessory structures. See the Architectural Site Plan for locations of the proposed fencing, Generator Enclosure and Covered Deck.

VOLUME 3: DEVELOPMENT GUIDELINES AND STANDARDS

3.01 Streets, Greenways & Other Off-Street Bicycle/Pedestrian Corridors, and Bus Transit (Code sections that do not apply to the proposed project have been omitted)

3.01.01 Applicability

- A. Right-of-way standards apply to all public streets and public alleys.**
- B. Improvement standards apply to all public and private streets, public alleys, sidewalks, landscape strips, and on and off-street public bicycle pedestrian corridors. Standards do not exclude conformance with the public works construction code that the Public Works Department administers.**
- C. The Woodburn Transportation System Plan (TSP) designates the functional class of major thoroughfares and local streets.**
- D. This applies to all development as Section 1.02 defines, and is not limited to partitions, subdivisions, multi-family, commercial or industrial construction, or establishment of a manufactured dwelling or recreational vehicle park; however, a lesser set of standards applies to infill residential development of 4 or fewer dwellings and where no land division or Planned Unit Development is applicable, including construction of a single-family dwelling or placement of a manufactured dwelling on an infill lot. See Section 3.01.03C.2.**

3.01.02 Street General Provisions

- A. No development shall be approved, or access permit issued, unless the internal streets, boundary streets and connecting streets are constructed to at least the minimum standards set forth in this Section, or are required to be so constructed as a condition of approval.**

- C. Materials and construction shall comply with specifications of the City of Woodburn.**
- D. The standards of this Section may be modified, subject to approval of a Street Adjustment, Planned Unit Development, Zoning Adjustment, or Variance. Other sections restrict where and how these application types apply.**

3.01.03 Street Improvements Required for Development

- A. With development, the Internal, Boundary, and Connecting streets shall be constructed to at least the minimum standards set forth below.**

C. Boundary Streets

- 1. The minimum improvements for a Boundary Street may be termed “half-street”**

improvements and shall be as follows, except per subsection 2:

- a. One paved 11-foot travel lane in each direction, even though this results in required improvements being slightly more than half-street by exceeding what the applicable cross section figure would require for a half-street;
- b. On-street parking on the side of the street abutting the development, if the required cross section includes on-street parking;
- c. Curb on the side of the street abutting the development;
- d. Drainage facilities on the side of the street abutting the development;
- e. Landscape strip with street trees and lawn grass on the side of the street abutting the development; and
- f. Sidewalk on the side of the street abutting the development.

- G. ADA: The minimum standards of this Section 3.01 apply to development such that implementation includes constructing new or upgrading existing public improvements to be ADA-compliant.

- I. TSP and other adopted long-range plans: Where such plans identify improvements within a Boundary Street, on the subject property of a development, or abutting a side or rear boundary of the subject property, the improvement or a proportional share of the improvement shall apply as a public improvement standard for the development. Applying a proportionate share may necessitate a developer applying to modify, adjust, or vary from a standard where and as the WDO allows.
- J. Off-site public improvements: To provide for the safety of the traveling public and ensure improved access to a development site consistent with Comprehensive Plan policies and WDO purposes and objectives for orderly urbanization and extension of public facilities, the Director may require off-site improvements reasonably related to a development and concurrent with it.

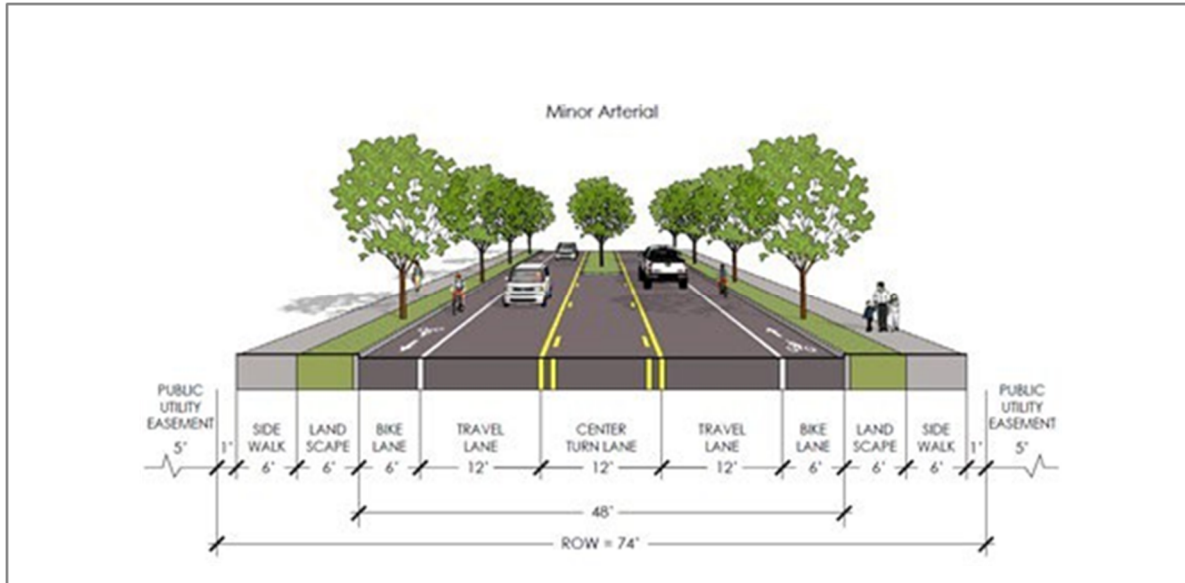
3.01.04 Street Cross Sections

- A. These standards are based on the functional classification of each street as shown in the Woodburn TSP. The street right-of-way and improvement standards minimize the amount of pavement and right-of-way required for each street classification, consistent with the operational needs of each facility, including requirements for pedestrians, bicycles, and public facilities.
- B. All public streets under the jurisdiction of the City of Woodburn shall comply with the cross-sections depicted in this Section, unless the developer obtains approval of Street Adjustment, modification through Planned Unit Development, Zoning Adjustment, or Variance as the WDO allows them to be applicable.

Landscape or planter strips shall have area remaining after street tree plantings landscaped with lawn grass or, if the Public Works Director in writing allows, a species of

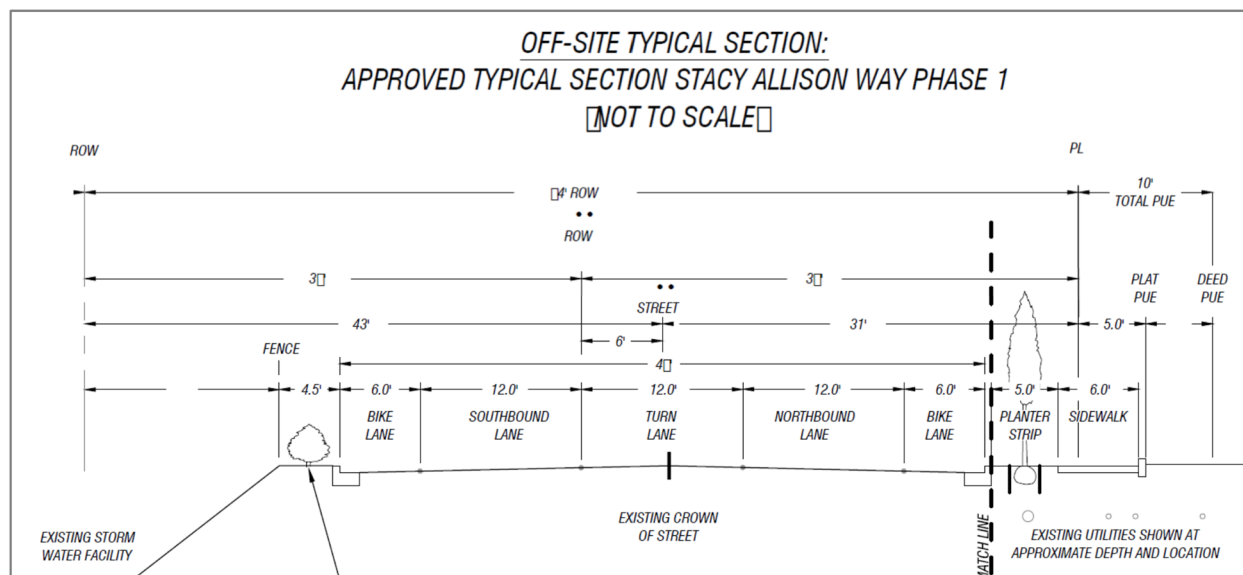
groundcover. Cobblestones, gravel, pebbles, and rocks are prohibited. Bark dust, mulch, or wood chips are permissible only within the immediate vicinity of a street tree trunk. The developer shall install landscape strip irrigation, and shall provide temporary irrigation during construction, per the public works construction code.

Figure 3.01C – Minor Arterial



(Note 3.01C: The illustrated median is conceptual, optional, and at the discretion of the Public Works Director.)

Stacey Allison Modified Cross-Section Approved for Allison Way Apartments Phase 1



Response: The proposed project fronts both Stacey Allison Way and Evergreen Road. Evergreen Road is a minor arterial street therefore improvements would match WDO Figure 3.01C. A new 6-foot-wide sidewalk is proposed to allow for a 6-foot-wide planter strip with new landscaping to meet WDO 3.01.03C.1.e, 3.01.04 and 3.06.03A. This will bring the Evergreen frontage improvements up to the requirements shown in Figure 3.01C.

As directed by City staff, proposed Stacey Allison Way frontage improvements include a new 6-foot-wide detached sidewalk and 5-foot planter strip to match the modified cross-section that was approved for the Allison Way Apartments Phase 1.

No additional ROW dedication is required along either Stacey Allison or Evergreen. New ADA compliant sidewalk curb ramps will be installed at all driveway access points from the subject site onto Stacey Allison and Evergreen.

3.01.05 Street Layout

C. Block Standards

1. **Block length shall not be less than 200 feet and not more than 600 feet, except where street location is precluded by any of the following;**
 - a. **Natural topography, wetlands, significant habitat areas or bodies of water, or pre-existing development;**
 - b. **Blocks adjacent to arterial streets, limited-access highways, collectors or railroads;**
 - c. **Residential blocks in which internal public circulation provides equivalent access.**
2. **In any block that is longer than 600 feet, as measured from the right-of-way line of the street to the right-of-way line of the adjacent street, a bikeway/ pedestrian facility shall be required through and near the middle of the block.**

4. **In a proposed development including partition and subdivision, or where redevelopment potential exists and a street connection is not proposed, one or more off-street bicycle/pedestrian facilities may be required as partition or subdivision connection paths or shortcut paths to connect a cul-de-sac or other public street to other public streets, to other bicycle/pedestrian facilities, or to adjoining land to allow for future connections.**

Response: The distance along Stacey Allison between Hooper Street to the south and Center Street to the north is more than 2,000 feet. Additional public streets between Hooper and Center are not feasible given the existing development.

The proposed project includes 717 feet of property frontage along Stacey Allison. An ADA compliant bikeway/pedestrian sidewalk is proposed along the southwest and south property lines to provide a pedestrian connection roughly mid-block from Stacey Allison to Evergreen. An additional ADA compliant pedestrian pathway is proposed roughly 420 feet further north to connect Stacey Allison to the main entrance and front walkway of the building. This pedestrian route will continue around the northeast side of the building and connect to Evergreen.

3.01.09 Bus Transit Improvements

- A. Purpose:** The purpose of this section is to provide for apparent, attractive, and dignified regional and City bus transit facilities, to improve service, especially to include and be equitable toward Woodburn residents who cannot or do not own private vehicles or drive, to extend the reach of those walking and cycling, to implement Woodburn Comprehensive Plan policies, to implement the Transportation System Plan (TSP), to implement the Transit Plan Update that supplements the TSP, to guide City capital improvement projects, and to have developers improve bus transit stops that have few or no improvements. The provision of bus transit improvements is guided also by the Highway 99E Corridor Plan and other WDO sections.
- B. Applicability:** The standards apply along a frontage for which development causes street improvements and either where a bus stop exists that lacks conforming improvements or the City has adopted a long-range transit plan identifying a new bus stop. The standards apply also to off-site bus stop improvements where and as conditioned.

Response: As of January 2026, the City will be implementing the preferred public transit service plan outlined in the City's 2023 Transit Development Plan. The plan identifies a new route running along Evergreen Road and an improved bus stop shelter for southbound busses along the proposed project frontage. The Applicant will coordinate with the City for the installation of the bus stop shelter to meet WDO 3.01.09 once the City implements the preferred service plan.

3.04 Vehicular & Bicycle/Pedestrian Access (Code sections that do not apply to the proposed project have been omitted)

The purpose of this Section is to establish procedures and standards for granting vehicular access to public streets. Pedestrian access to public streets and between buildings is required and specified by the Woodburn Development Code (WDO).

3.04.01 Applicability and Permit

A. Street Access

Every lot and tract shall have minimum access per subsection 1. or 2.:

- 1. Direct access to an abutting public street, alley, or shared rear lane; or**
- 2. Access to a public street by means of a public access easement and private maintenance agreement to the satisfaction of the Director, revocable only with the concurrence of the Director, and that is recorded. The easement shall contain text that pursuant to Woodburn Development Ordinance (WDO) 3.04.03B.3, the public shared access (ingress and egress) right of this easement is revocable only with the written concurrence of the Community Development Director.**

3.04.03 Access Management: Driveway Guidelines and Standards

- A. Purpose: To implement Woodburn Comprehensive Plan policies, to implement the Highway 99E Corridor Plan, to reduce vehicular points of conflict, to reduce driveways interrupting landscape strips and the pedestrian experience along sidewalk, to preserve the appearance of street-facing yards in developments of other than multiple-family dwellings, and to preserve on-street parking where existing or required of development.**
- B. Number of Driveways**

- 3. For nonresidential uses, the number of driveways should be minimized based on overall site design, including consideration of:**
 - a. The function classification of abutting streets;**
 - b. The on-site access pattern, including parking and circulation, joint access, turnarounds and building orientation;**
 - c. The access needs of the use in terms of volume, intensity and duration characteristics of trip generation.**

- 5. For all development and uses, the number of driveways shall be further limited through access management per subsections C & D below.**

C. Joint Access

- 1. Lots that access a Major Arterial, Minor Arterial, Service Collector, or Access Street should be accessed via a shared driveway or instead to an alley or shared rear lane.**

- 3. Every joint driveway or access between separate lots shall be per the same means as in Section 3.04.01A.2.**
- 4. Standards:**

- a. **Easement:** Per Section 3.04.01A.2 and minimum width 20 feet.
- b. **Improvements:** The easement and the drive aisle or aisles it follows shall align along centerline. Each shared access drive aisle shall extend to the property line with no terminating curb and no fixed barrier mounted to the drive aisle. The drive aisle minimum width is 20 feet if without side curbs and 21 feet inclusive of side curbs.

D. Access management:

2. **Commercial:** Any development within a commercial zoning district that Section 2.03A lists shall grant shared access to adjacent lots and tracts partly or wholly within any of the same districts. An alley or shared rear lane may substitute for meeting this standard if the alley provides equivalent public access. Zoning Adjustment is permissible.

E. Interconnected Parking Facilities

1. All uses on a lot shall have common or interconnected off-street parking and circulation facilities.
2. Similar or compatible uses on abutting lots shall have interconnected access and parking facilities.

Table 3.04A

Access Requirements Table 3.04A		
		Commercial or Industrial Use

Paved Width of Driveway (feet) ^{3, 4, 7, 8}	2-way	Commercial/Mixed-Use: 20 minimum 24 maximum* *(Add 12 ft maximum if a turn pocket is added)

Throat Length (feet) ⁵	Major Arterial, Minor Arterial, Service Collector	Commercial: 36 minimum; Industrial: 50 minimum
	Access or Local Street	18 minimum
Corner Clearance (feet) Guidelines ¹ (See Figure 3.04B)	Access or Local Street	30 minimum
	Service Collector	50 minimum
	Minor Arterial	245 minimum
	Major Arterial	300 minimum
Driveway Separation Guidelines (feet) ^{1, 2} (See Figure 3.04B)	Driveway on the same parcel	50 minimum
	Access or Local Street	none
	Service Collector	50 minimum
	Minor Arterial	245 minimum
	Major Arterial	300 minimum

1. The separation should be maximized.
2. Driveways on abutting lots need not be separated from each other, and may be combined into a single shared driveway.
3. Driveways over 40 feet long and serving one dwelling unit may have a paved surface minimum 8 feet wide.
4. Notwithstanding the widths listed in this table, the minimum clearance around a fire hydrant shall be provided (See Figure 3.04D).
5. Throat length is measured from the closest off-street parking or loading space to the right-of-way. A throat applies only at entrances (See Figure 3.05B).
6. Maximum of 4 individual lots can be served from single shared driveway (See Figure 3.04A) except where and as Section 3.04.03D.3 "Flag Lots" supersedes.
7. It is permissible that the Oregon Fire Code (OFC) as administered by the independent Woodburn Fire District may cause driveway widths to exceed minimums and maximums. It is a developer's responsibility to comply with the OFC.
8. Width measurement excludes throat side curbing, if any.

Response: As a minor arterial street, only one driveway access is allowed along Evergreen Road pursuant to WDO 3.04.03B.3. The driveway is proposed to be roughly 150 feet from the existing driveway into the Cascade Meadow Apartments to the south. Per City staff the 245-foot separation shown in Table 3.04A is a guideline rather than a required standard. The Applicant is proposing this driveway location to allow easier (less circuitous) vehicle access into the site as well as more direct fire access to the building Fire Department Connection (FDC) that is on the southwest side of the building. Per the project Traffic Impact Analysis (TIA), traffic volumes at the Hooper Street/Evergreen Road intersection just south of the Oxford intersection are exceptionally low during peak hours. Hooper serves a similar function to Oxford and therefore would also have low traffic volumes at the intersection with Evergreen. The apartment access may be slightly busier than the Oxford intersection but traffic from both would be minimally impacted by the new, proposed access point to Evergreen.

All driveways are proposed to be no wider than 36-feet as allowed by Table 3.04A. The two driveways accessing Stacey Allison are separated by more than 400 feet, meeting the minimum separation distance required by Table 3.04A. To meet 3.04.03D.2 and 3.04.03C.4, a driveway will be installed to connect the subject property to the commercial properties and Center Street to the north. As indicated on the Architectural Site Plan, a future driveway will connect to commercial properties to the south.

3.04.05 Transportation Impact Analysis

- A. This section establishes when a proposal must be reviewed for potential transportation impacts; when developer must submit a transportation impact analysis (TIA) or transportation impact letter or memo with a development application in order to determine whether conditions are needed to mitigate impacts to transportation facilities; the methodology and scope of a TIA or letter or memo; who is qualified to prepare the analysis; and implements Woodburn Comprehensive Plan policies. Where the IMA Overlay District is relevant, see also Section 2.05.02.**
- B. A transportation study known as a transportation impact analysis (TIA) is required for any of the following:**
- **Comprehensive Plan Map Change or Zone Change or rezoning that is quasi-judicial, excepting upon annexation designation of zoning consistent with the Comprehensive Plan.**
 - **A development would increase vehicle trip generation by 50 peak hour trips or more or 500 average daily trips (ADT) or more.**
 - **A development would raise the volume-to-capacity (V/C) ratio of an intersection to 0.96 or more during the PM peak hour.**
 - **Operational or safety concerns documented by the City or an agency with jurisdiction, such as ODOT or the County, and submitted no earlier than a pre-application conference and no later than as written testimony entered into the record before the City makes a land use decision.**
 - **A development involves or affects streets and intersections documented by ODOT as having a high crash rate, having a high injury rate of persons walking or**

cycling, having any cyclist and pedestrian deaths, or that partly or wholly pass through school zones that ODOT recognizes.

- Where ODOT has jurisdiction and ORS or OAR, including OAR 734-051, compels the agency to require.

A developer shall submit a traffic impact letter or memo when the City or an agency with jurisdiction does not require a TIA. A development within the Downtown Development and Conservation (DDC) zoning district is exempt from TIA submittal.

- C. A TIA shall evaluate the transportation impacts projected of a development proposal, and where a development would fail to meet a transportation standard or would hinder public safety, shall list and describe mitigation to the satisfaction of the City. To bring about mitigation, the City may apply conditions having rational nexus and rough proportionality, and conditions may establish improvements, fees, and transportation demand management (TDM) for a development above and beyond WDO minimums.

- F. The methodology for a TIA shall be consistent with City standards, both below and where superseded by any of other sections of the WDO (such as Section 2.05.02 for the IMA Overlay District), another City ordinance, a resolution, written policy, or ODOT or County jurisdiction and application of more stringent agency standards. Vehicular level of service (LOS) and volume-to-capacity (V/C) ratio shall be as follows:

- For a signalized and all-way stop-control intersection, the minimum LOS shall be either "E" or if pre-development already operating at lower LOS, then at no lower LOS.
- For a signalized intersection, the minimum V/C ratio shall be either less than 1.00 regardless of LOS or if pre-development already operating at 1.00 or higher V/C, then at no higher V/C.
- For an unsignalized intersection, the minimum V/C shall be 0.95 or lower for minimum the major movement through the intersection, or, if pre-development already operating at higher V/C, then at no higher V/C.
- For developments within the Gateway Commercial General Overlay, Mixed Use Village (MUV), and Neighborhood Nodal Commercial (NNC) zoning districts and intersections partly or wholly within a district, the Director may allow the lower minimum of either LOS "F" or 1.00 V/C, whichever is more generous.
- Modeling assumptions: The vehicle trip background growth rate shall be minimum zero percent and maximum 0.5 percent. Vehicles per lane per hour shall be minimum 720 for a local class street with signalized intersections.
- The Director may specify what intersections a TIA is to study.
- A developer may propose, and the Director may allow, a different analysis and concurrent mitigation based on any of the ITE manual Designing Walkable Urban Thoroughfares: A Context Sensitive Approach and the NACTO Urban Street Design Guide.

Response: The aforementioned TIA submitted by the applicant meets the requirements of WDO 3.04.05.

3.04.06 Bicycle/Pedestrian Access between Sidewalk and Building Entrances

- B. Wide walkway:** Excluding residential development other than multiple-family dwellings, 1 wide walkway minimum or with each of two frontages for sites of two or more frontages. Where a development includes or abuts a public off-street bicycle/pedestrian facility, a wide walkway shall also connect to the facility. Minimum width 8 feet, ADA-compliant, and not gated. Gating is allowed only if the development driveway throat or throats are gated.

- D. Walkway and wide walkway crossings:** A development with crossings of drive aisles shall have one or more crossings made visually distinct from adjacent vehicular pavement and minimum width equal to that of the walkway.

- 1. Wide walkways:** Minimum width 8 ft each. Every crossing along a wide walkway shall be either an extension of wide walkway poured concrete at the same grade as adjacent vehicular area or in the form of a speed table, also known as a raised walkway crossing, minimum 4 inches high and with vehicular side ramps maximum slope ten percent and with striped warning triangles. ADA-compliant transitions or ramps shall be minimum 5 feet wide. For multiple-family dwelling development, the speed table option shall be a requirement.

Response: Wide walkways meeting WDO 3.04.06 are proposed from the building to both Stacey Allison Way and Evergreen Road. These walkways also connect to the privately owned on-site bicycle parking. The walkways will be ADA compliant and not gated.

3.05 Off-Street Parking and Loading (Code sections that do not apply to the proposed project have been omitted)

3.05.02 Applicability

The provisions of this Section shall apply to the following types of development:

- A. All requirements and standards of Section 3.05 shall apply to any new building or structure constructed after the effective date of the Woodburn Development Ordinance (WDO).**

D. Location

1. Off-street parking and loading spaces shall be provided on the same lot as the primary building or use except that:

- b. In any zone other than RS, R1S or RM, the parking spaces may be located on another site, if such site is within 500 feet of the site containing the primary building, structure or use.

2. Off-street parking shall be located either in the same zone, in a more intensive zone or in a zone where parking is allowed as a permitted use, or subject to approval as a conditional use.

4. In non-residential districts, off-street parking and storage shall be prohibited within a setback adjacent to a street, except if screened per Section 3.06.05B. Vehicle parking within the public right-of-way shall not be eligible for fulfilling any required off-street parking requirement.

E. Setback

1. In commercial and industrial zones, the parking, loading, and circulation areas shall be set back from a street a minimum of five feet.
2. Parking, loading, and circulation areas shall be set back from a property line a minimum of five feet, excepting any of (a) interior lot lines of lots in a development that have the same owner or that have outbuildings as part of a complex of buildings sited amid parking, such as in an office or industrial park or strip mall, (b) a shared access and use agreement between or among landowners per Section 3.04, and (c) shared access in the specific context of residential development of other than multiple-family dwellings.

- F. All vehicle parking and loading areas shall be paved to the standards of this ordinance (Section 3.04.04), except that in the IP, IL, SWIR, and P/SP zones, storage areas used for equipment that may damage pavement may be stored on a gravel-surface storage area. A gravel storage area shall be constructed to a minimum of surfacing of: six inches of one inch minus to three inch minus gravel. If three inch minus is used, the top two inches shall be one inch minus. The property owner shall maintain a gravel storage area to ensure continued drainage and dust control. A paved access apron to any paved access road is required, regardless of the storage area surface.

- G. All vehicle parking, loading, and storage areas shall be graded and provide storm drainage facilities approved by the Director.

- H. All parking spaces, except those for residential development other than multiple-family dwellings, shall be constructed with concrete or rubber bumper guards or wheel barriers maximum 4 inches high that prevent vehicles from damaging structures, projecting over walkways so as to leave less than 4.5 feet of unobstructed passage, or projecting over wide walkways, abutting properties, or rights-of-way.

- I. Maneuvering areas shall be designed in compliance with this Section (Table 3.05B). Off-street parking areas shall be designed so that no backing or maneuvering within a

public right-of-way is required. These provisions do not apply to dwellings other than multiple-family.

- J. All uses required to provide 20 or more off-street parking spaces shall have directional markings or signs to control vehicle movement, and any dead-end drive aisle 50 feet or longer shall have an MUTCD-compliant “no outlet” sign.
- K. Except for dwellings other than multiple-family, off-street parking spaces shall be delineated by double parallel lines on each side of a space, except a side adjacent to any of curb or ADA parking accessible aisle. The total width of the lines shall delineate a separation of two feet. The lines shall be four inches wide (See Figure 3.05C).
- L. Parking area lighting for all developments shall conform to Chapter 3.11.

- N. Walkway crossings: Parking areas with multiple aisles shall have minimum 1 walkway or wide walkway that passes through the parking area to the aisle farthest from the building. Each walkway crossing shall conform to Section 3.04.06D.

3.05.03 Off-Street Parking

A. Number of Required Off-Street Parking Spaces

- 1. Off-street vehicle parking spaces shall be provided in amounts not less than those set forth in this Section (Table 3.05A).
- 2. Off-street vehicle parking spaces shall not exceed two times the amount required in this Section (Table 3.05A).

- B. ADA: Accessible parking shall be provided in amounts not less than those that ORS 447.233 requires. The number of accessible spaces shall be included as part of total required vehicle parking spaces.
- C. A maximum of 20 percent of the required vehicle parking spaces may be satisfied by compact vehicle parking spaces.
- D. Off-street vehicle parking spaces and drive aisles shall not be smaller than specified in this Section (Table 3.05B).
- E. A developer shall provide off-street bicycle parking per the minimums and standards in Tables 3.05D & G and the additional standards in Section 3.05.06.

Table 3.05A

Off-Street Parking Ratio Standards Table 3.05A	
Use ^{1, 2}	Parking Ratio - spaces per activity unit or square feet of gross floor area
COMMERCIAL / PUBLIC	

7. General retail sales (such as food and beverages, clothing, sporting goods, health and personal care items, and motor vehicle parts)	1/ 250 square feet

<p>1. The Director may authorize parking for any use not specifically listed in this table. The applicant shall submit an analysis that identifies the parking needs, and a description of how the proposed use is similar to other uses permitted in the zone. The Director may require additional information, as needed, to document the parking needs of the proposed use.</p> <p>3. There is no required parking ratio in the DDC zone per Section 3.07.07B.12.</p> <p>***</p>	

Table 3.05B

Parking Space and Drive Aisle Dimensions Table 3.05B							
Parking Angle	Type of Space	Stall Width (feet)	Curb Length (feet)	Stripe Length (feet)	Stall to Curb (feet)	Drive Aisle Width (feet)	
						1-way	2-way
A		B	C	D	E	F	G

90° (Perpendicular)	Standard	9.0	9.0	18.0	18.0	24.0	24.0 ⁸
	Compact	7.5	7.5	15.0	15.0	22.0	
	Car Accessible Aisle	6.0	6.0	18.0	18.0	24.0	
	Van Accessible Aisle	8.0	8.0	18.0	18.0		

8. Zoning Adjustment permissible.							

Response: Pursuant to WDO 3.05.02D.1, off-street vehicle parking is proposed on the same lot as the proposed building. Per Table 3.05A, a minimum of 336 off-street parking stalls must be provided as part of the proposed development. The number of stalls proposed (i.e., 504 stalls) exceeds that required by Table 3.05A, however, is less than double that required in order to stay under the limit imposed by WDO 3.05.03A.2. As required by WDO 3.05.02D.4 and 3.05.02E, no parking is proposed within the setbacks, and all parking and circulation areas


are setback a minimum of 5-feet from boundary streets as well as interior property lines.

All parking and circulation areas are paved, graded, and include storm drainage facilities in compliance with WDO 3.05.02F and G. Concrete curbs, wheel stops and steel pipe bumpers are proposed as necessary to meet the requirements of 3.05.02H. Stall width and length, accessible aisles and drive aisles meet or exceed the minimum dimensions shown in Table 3.05B and are in compliance with WDO 3.05.02I. Directional markings and double stall delineation lines are proposed pursuant to 3.05.02J and K. A wide walkway meeting WDO 3.04.06D is proposed to pass through the parking area and extend all the way to Stacey Allison way to meet 3.05.02N.

Proposed accessible parking meets all requirements of WDO 3.05.03B. No compact parking is proposed.

Parking area lighting and off-street bicycle parking are addressed under Sections 3.11 and 3.05.06 of this narrative, respectively.

Table 3.05C

<p style="text-align: center;">Carpool/Vanpool Parking</p> <p style="text-align: center;">Table 3.05C</p> <div style="text-align: center;">  </div>		
Development or Use	Description	Stall Minimum Number or Percent
1. Non-residential development within commercial zoning districts	Zero to 19 total minimum required off-street parking spaces	n/a
	20 to 33 total	1 stall
	34 to 65 total	2 stalls
	66 or more total	2 stalls or 3%, whichever is greater

1. Standard applies even if the site is not zoned P/SP. 2. See Section 3.05.03H for carpool/vanpool (C/V) development standards.		

H. Carpool/vanpool (C/V) stalls shall meet the following standards:


1. **Convenient locations:** The distance from a stall, in whole or in part, shall be maximum 50 feet to a building perimeter walkway or, where there is no perimeter walkway, a building main or staff-only entrance.
2. **Striping:** Stripe each stall in lettering 1 ft high min “CARPOOL/VANPOOL” or

similar.

3. **Signage:** Post at each stall a wall-mounted or pole-mounted sign for “Carpool/Vanpool” or similar. Each sign 1½ by 1 foot minimum with top of a posted sign between 5½ and 7 feet high max above vehicular grade.

Response: The Applicant is proposing carpool/vanpool parking stalls in compliance with WDO Table 3.05C.

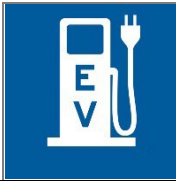
Table 3.05D

Off-Street Bicycle Parking Table 3.05D		
		
Development or Use	Description	Stall Minimum Number, Percent, or Ratio

2. Non-residential development within commercial zoning districts		Whichever of the two rates is greater: (1) 2 stalls or 15% of total minimum required parking spaces, whichever is greater; or (2) 2 stalls or equal to 0.6/ 1,000 square feet GFA, whichever is greater.

Response: Strict compliance with WDO Table 3.05D would require 50 bike parking stalls to be developed as part of the proposed project. The Applicant is requesting a variance to reduce this as described under the Requested Variances section of this narrative.

Table 3.05E

<p style="text-align: center;">Electric Vehicle Parking Table 3.05E</p> 		
Development or Use	Description	Stall Minimum Number or Percent

2. Non-residential development within commercial zoning districts	Zero to 19 total minimum required spaces	n/a
	20 to 39 total	2 stalls
	40 or more total	2 stalls or 5%, whichever is greater

<p>***</p> <p>2. The Director may authorize EV parking for any use that the Development or Use column does not clearly include.</p> <p>3. See Section 3.05.03I below for EV development standards.</p> <p>4. Administrative note: As of January 2022, electrical permitting remains through the County instead of the City by agreement between the City and County.</p>		

- I. Electric vehicle (EV) includes both electric vehicle and plug-in hybrid vehicle, and EV parking stalls shall meet the following standards:**
- 1. Convenient locations:** The distance from a stall, in whole or in part, shall be maximum 50 feet to a building perimeter walkway or, where there is no walkway, a building main or staff-only entrance.
 - 2. Charging level:** minimum Level 2 (240 volt alternating current [AC] charging), or faster charging.
 - 3. Striping:** Stripe each stall in lettering 1 ft high min “ELECTRIC VEHICLE CHARGING” or similar and stencil of an EV image or logo.
 - 4. Signage:** Post at each stall a wall-mounted or pole-mounted sign for “Electric Vehicle Charging” or similar and include an EV image or logo. Each sign 1½ by 1 foot minimum with top of a posted sign between 5½ and 7 feet high max above vehicular grade.

It is anticipated but not required that the layout would be that each charging station would serve a pair of stalls.

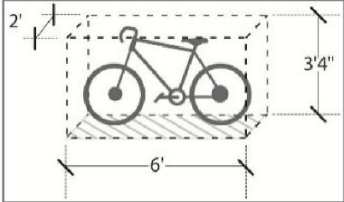
Response: Strict compliance with WDO Table 3.05E would require 17 Level 2 electric vehicle (EV) charging stalls to be developed as part of the proposed project. The Applicant is requesting a variance to provide a reduced number of charging stalls at a higher charging level (Level 3) as described under the Requested Variances section of this narrative. Proposed EV charging stalls otherwise meet all requirements of WDO 3.05.02I.

3.05.06 Bicycle Parking Standards

- B. Applicability:** Applies to total minimum required bicycle parking per Table 3.05D and any excess.
- C. Standards:** Developers shall install parking in lockers or racks that meet the following:
 - 1. Surface:** The area devoted to bicycle parking shall be paved if outdoors or otherwise hard surfaced if enclosed or indoors. Outdoor pavement shall be asphalt, bricks, cobblestone rectangular pavers, concrete pavers, poured concrete, structurally supported fiber cement or wood planking, or combination.
 - 2. Facility:** Where bicycle parking is provided with racks, they shall meet the following:
 - a.** The rack shall be designed so that the bicycle frame and one wheel can be locked to a rigid portion of the rack with a U-shaped shackle lock, when both wheels are left on the bicycle;
 - b.** If the rack is a horizontal rack, it shall support the bicycle at two points, including the frame; and
 - c.** The rack must be securely anchored with tamper-resistant hardware.
 - 3. Dimensions.** Bicycle parking spaces, aisles and clearances shall be per Table 3.05G, which Figures 3.05E, F, & G illustrate.
 - 4. Signage:** If bicycle parking is not visible from sidewalk, wide walkway, or the main entrance of the building(s), a developer must install a permanent sign, minimum 1 by 1.5 feet, at the main entrance of each primary building indicating the location of bicycle parking. Figure 3.05H illustrates examples.
 - 5. Proximity:** A developer shall construct or install bicycle parking within maximum 50 feet of the main entrance and per Figures 3.05J-L.
 - 6. Covered/sheltered:** A developer shall cover or shelter from precipitation among the total required bicycle parking minimum 50 percent of any and all parking that is outdoors.

8. **Plan review:** The developer or contractor shall submit the following information with applications for any of land use or building permit review:
- Location;** where not obvious, access route(s) to; and number of bicycle parking stalls;
 - Notated dimensions of all stalls, aisles, maneuvering areas, and clearances;** and
 - If applicable, information adequate to illustrate the racks and stalls that meet a particular set of standards.**

Table 3.05G

<p align="center">Bicycle Parking Stall Minimum Dimensions</p> <p align="center">Table 3.05G</p> 			
Dimension	Conventional Horizontal ¹ (feet)	Stall Minimum Number or Percent	
		Horizontal as Wall-Attached ³	Vertical or Wall-Mounted ^{1,4,5}
Length	6	6	3 ft, 4 inches
Width	2	2	1 ft, 5 inches
Height	3 ft, 4 inches	3 ft, 4 inches	6
Maneuvering Width ⁷	5	5	5
Clearance	0.5 ⁸	1 ⁹	n/a
<p>1. See Figure 3.05E.</p> <p>***</p> <p>4. See Figure 3.05G.</p> <p>5. Vertical or wall-mounted maximums:</p> <ol style="list-style-type: none"> Where the total minimum required bicycle parking is fewer than 4 stalls, vertical and wall-mounted stalls are prohibited. Where the total minimum required bicycle parking is 4 or more stalls, of the subtotal that is outside a building, maximum 50 percent may be vertical stalls. <p>***</p> <p>7. Sidewalk: Where a bicycle parking stall is adjacent to a sidewalk, off-street bicycle/pedestrian facility, walkway, or access way, the maneuvering area may overlap it.</p> <p>8. Measured to stall length or width boundary.</p> <p>9. Measured to centerline of outermost bar of facility.</p>			

Response: Strict compliance with WDO Table 3.05D and 3.05.06 would require 50 bike parking stalls to be developed as part of the proposed project. The Applicant is requesting a variance to reduce this as described under the Requested Variances section of this narrative. The proposed bicycle parking stalls are all covered and, as shown on the Architectural Site Plan and Bike Parking Enlarged Plan, otherwise meet all requirements of WDO 3.05.06.

3.06 Landscaping (Code sections that do not apply to the proposed project have been omitted)

3.06.02 General Requirements

- A. Building plans for all uses subject to landscaping requirements shall be accompanied by landscaping and irrigation plans.**
- B. All required landscaped areas shall be irrigated unless it is documented that the proposed landscaping does not require irrigation.**
- C. All shrubs and ground cover shall be of a size upon installation so as to attain 80% of ground coverage within 3 years.**

- G. Required plant units need not be allocated uniformly throughout specified landscaping areas, but may be grouped for visual effect.**
- H. Landscaped areas that are not covered by plant materials shall be covered by a layer of bark mulch or decorative rock, a minimum of two inches in depth.**
- I. A minimum 4 inch high and wide concrete curb shall be provided between landscaped areas and parking and circulation areas.**
- J. Plant materials shall be appropriate to the climate and environment of Woodburn. Inclusion of plants identified in “Suggested Plant Lists for Required Landscaping”, published by the Portland Bureau of Development Services, can be used to meet this standard. A landscape architect, certified arborist or nursery person may also attest to plant appropriateness.**
- K. Prohibited trees identified by this ordinance (Table 3.06C) do not count towards required landscaping.**

3.06.03 Landscaping Standards

A. Street Trees

The purpose of the street tree provisions is to get and preserve street trees, to shade those walking and provide them psychological protection from passing vehicles, to calm those driving, to help spatially define streets through canopy, to absorb stormwater and pollutants, to reduce the urban heat island effect, and to raise value of adjacent property. Within the public street right-of-way abutting a development, street trees shall be planted to City standards, prior to final occupancy or earlier if conditioned.

1. A number of trees equal to one tree per every 30 feet of street frontage within a block face, shall be planted within the right-of-way.
2. Street trees shall be planted according to the Boundary Street classification per the Transportation System Plan:
 - a. Large trees shall be planted along Major and Minor Arterial streets. Regardless of street classification, a developer shall plant large trees also along all streets that either are in the Neighborhood Conservation Overlay District (NCOD) or are boulevards, and for boulevards also in the medians;
 - b. Medium trees shall be planted along Service Collector and Access/Commercial Streets; c. Small trees shall be planted along all other streets.

Refer to Table 3.06B below for the definition of size categories at maturity.

3. Root barriers: The developer shall install root barriers per the public works construction code.

B. Site landscaping shall comply with Table 3.06A.

Table 3.06A

Planting Requirements Table 3.06A		
Location	Planting Density, Minimum	Area to be Landscaped, Minimum
1. Setbacks abutting a street	1 PU/15 square feet	Entire setback excluding driveways
2. Buffer yards	1 PU/20 square feet	Entire yard excluding off-street parking and loading areas abutting a wall
3. Other yards	1 PU/50 square feet	Entire yard, excluding areas subject to more intensive landscaping requirements and off-street parking and loading areas

4. Off-street parking and loading areas	<ul style="list-style-type: none"> • 1 small tree per 10 parking spaces; or ¹ • 1 medium tree per 15 parking spaces; or ¹ • 1 large tree per 25 parking spaces ¹ and 1 PU/20 square feet excluding required trees ²	<ul style="list-style-type: none"> • RS, R1S, RSN, RM, RMN, P/SP, CO, CG and MUV zones: 20% of the paved surface area for off-street parking, loading and circulation • DDC, NNC, IP, IL, and SWIR zones: 10% of the paved surface area for off-street parking, loading and circulation • Landscaping shall be within or immediately adjacent to paved areas
5. Common areas, except those approved as natural common areas in a PUD	3 PU/50 square feet	Entire common area
<ol style="list-style-type: none"> 1. Trees shall be located within off-street parking facilities, in proportion to the distribution of the parking spaces. 2. Required landscaping within a setback abutting a street or an interior lot line that is within 20 feet of parking, loading and circulation facilities may also be counted in calculating landscaping for off-street parking, loading and circulation areas. 		

C. Parking area landscape island standards: Landscape islands or peninsulas shall cap each aisle end to protect parked vehicles from moving vehicles, emphasize vehicular circulation patterns, and shade vehicles and pedestrians. Structured parking is exempted.

1. Each south, southwest, and west island or peninsula cap of a parking aisle shall be minimum 84 square feet within back of curbing, narrowest dimension 6 feet within back of curbing, and contain a tree.
2. Remaining islands and peninsulas shall be minimum 28 square feet within back of curbing and narrowest 2 feet within back of curbing, except where subsection 3 below supersedes.
3. There shall be no more than 10 consecutive parking spaces in a parking aisle without a mid-aisle landscape island or peninsula. For consecutive parking spaces that include one or more accessible/ADA spaces and their aisles, the maximum shall be 9 consecutive parking spaces. Mid-aisle landscape islands or peninsulas shall be to the same standards as subsection 1 above.
4. At drive aisle crossings of walkways and wide walkways that respectively Sections 3.04.06D and 3.05.02N describe, each south, southwest, and west side shall have a landscape island or peninsula to the same standards as subsection 1 above.

Table 3.06B

Plant Unit (PU) Value Table 3.06B		
Material	Plant Unit (PU) Value	Minimum Size
1. Significant tree ¹	15 PU each	24" Diameter
2. Large tree (60-120 feet high at maturity) ¹	10 PU each	10' Height or 2" Caliper
3. Medium tree (40-60 feet high at maturity) ¹	8 PU each	10' Height or 2" Caliper
4. Small tree (18-40 feet high at Maturity) ¹	4 PU each	10' Height or 2" Caliper

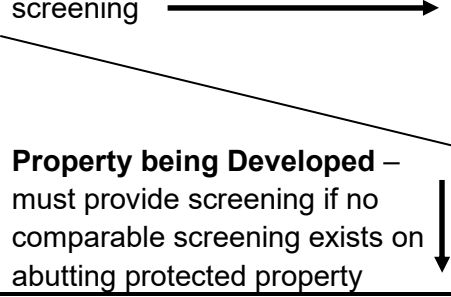
Response: The Applicant has provided a proposed Landscape Plan and Legend showing full compliance with plant unit (PU) requirements as outlined in WDO Tables 3.06A and 3.06B. Street trees are proposed along Stacey Allison and Evergreen Road to meet the requirements of 3.06.03. Proposed parking area islands cap each aisle, emphasize vehicular circulation and all exceed 84 square feet with narrowest clear dimensions of 6-feet. All islands contain a tree except the island with the flagpole (and an adjacent light pole). This island is on the southeast side of the parking area and therefore allowed to be without a tree per WDO 3.06.03C.1 and 2. The islands divide the parking area so there are no more than 10 consecutive parking spaces (or 9 at accessible stalls) between islands. Proposed walkway crossings meet WDO 3.06.03C.4.

3.06.05 Screening

A. Screening between zones and uses shall comply with Table 3.06D.

Table 3.06D

Screening Requirements Table 3.06D
N = No screening required F = Sight-obscuring fence required W = Architectural wall required D = Architectural wall, fence, or hedge may be required in the Design Review process

Adjacent properties – zone or use that receives the benefit of screening 	RS, R1S, or RSN zone	RM or RMN zone	DDC or NNC zone	CO zone	CG or MUV zone	IP, IL, or SWIR zone	P/SP zone	Same label as Row 9	Multiple-family dwelling, child care facility, group home or nursing home ^{5, 8}	Nonresidential use in a residential zone	Manufactured dwelling park

5. CG or MUV zone	W ²	W ²	D	D	D	D	D	W ²	W ²	D	W ²

*** 2. Six to seven feet in height ***											
General notes: 9. Screening is subject to height limitations for Vision Clearance Areas (Section 3.03.06) and adjacent to streets (Section 2.01.02). 10. No screening is required where a building wall abuts a property line. 11. Where a wall is required and is located more than two feet from the property line, the yard areas on the exterior of the wall shall be landscaped to a density of one plant unit per 20 square feet.											

- B. All parking areas, except those for single-family dwellings and dwellings other than multiple-family, abutting a street shall provide a 42-inch (3.5-foot) vertical visual screen from the abutting street grade. Acceptable design techniques to provide the screening include plant materials, berms, architectural walls, and depressed grade for the parking area. All screening shall comply with the clear vision standards of this ordinance (Section 3.03.06).**

3.06.06 Architectural Walls

- A. This Section shall apply to required architectural walls.**
B. Design Standards and Guidelines

- 1. An architectural wall shall meet the texture, color, and articulation requirements on the face away from the proposed development.**
- 2. An architectural wall should meet the texture, color, and articulation requirements on the face toward the proposed development.**

3. An architectural wall shall have a minimum three inch horizontal articulation of at least one linear foot of the wall of intervals not more than 40 feet; and
4. An architectural wall shall have a minimum six inch vertical articulation of at least one linear foot of the wall of intervals not more than 40 feet.
5. An architectural wall shall incorporate at least two colors.
6. An architectural wall shall have an earth tone coloration other than grey on at least eighty percent (80%) of the surface.
7. An architectural wall shall be architecturally treated with scoring, texture, or pattern on at least eighty percent (80%) of the surface.

Response: Plant materials are proposed between Stacey Allison Way and the proposed parking area to meet the screening criteria required per WDO 3.06.05B.

Per WDO Table 3.06D a 6-7-foot-high architectural screen wall is required between the proposed project and the adjacent residential (RMN) property to the south. An existing 6-foot-high CMU wall is already located along this property line. The Applicant proposes to leave this wall in place since it meets the screen wall height and texture/pattern requirements of WDO Table 3.06D and section 3.06.06B.7. The existing wall does not meet the full intent of 3.06.06B.3-4 because it doesn't have the required, small horizontal and vertical articulation. However, replacing the wall with a similar wall that meets these articulation requirements would result in an almost identical wall in appearance and be a bothersome and intrusive process to the existing Cascade Meadows Apartments residents. The Applicant proposes to clean and paint the wall to meet sections 3.06.06B.5 and 6.

All other adjoining (adjacent) properties are zoned commercial and therefore do not require screening from the proposed project per WDO Table 3.06D.

3.07 Architectural Design (Code sections that do not apply to the proposed project have been omitted)

3.07.01 Applicability of Architectural Design Standards and Guidelines

- A. For a Type I review, the criteria of this Section shall be read as “shall” and shall be applied as standards. For a Type II or III review, the criteria of this Section shall be read as “should” and shall be applied as guidelines.

3.07.06 Standards for Non-Residential Structures in Residential, Commercial and Public/Semi Public Zones

- A. The following design guidelines shall be applicable to all non-residential structures and buildings in the RS, RSN, R1S, RM, RMN, CO, CG, and P/SP zones.
- B. Architectural Design Guidelines

1. Mass and Bulk Articulation Guidelines

- a. Building facades visible from streets and public parking areas should be articulated, in order to avoid the appearance of box-like structures with unbroken wall surfaces.
- b. The appearance of exterior walls should be enhanced by incorporating three-dimensional design features, including the following:
 - (1) Public doorways or passage ways through the building
 - (2) Wall offsets or projections
 - (3) Variation in building materials or textures
 - (4) Arcades, awnings, canopies or porches

2. Materials and Texture Guidelines

- a. Building exteriors should exhibit finishes and textures that reduce the visual monotony of bulky structures and large structural spaces. Building exteriors should enhance visual interest of wall surfaces and harmonize with the structural design.
- b. The appearance of exterior surfaces should be enhanced by incorporating the following:
 - (1) At least 30% of the wall surface abutting a street should be glass.
 - (2) All walls visible from a street or public parking area should be surfaced with wood, brick, stone, designer block, or stucco, or with siding that has the appearance of wood lap siding.
 - (3) The use of plain concrete, plain concrete block, corrugated metal, plywood, T-111 and sheet composite siding as exterior finish materials for walls visible from a street or parking area should be avoided.
 - (4) The color of at least 90 percent of the wall, roof and awning surface visible from a street or public parking area should be an “earth tone” color containing 10 parts, or more of brown or a “tinted” color, containing 10 parts or more white.
 - (5) Fluorescent, “day-glo,” or any similar bright color shall not be used on the building exterior.

3. Multi-Planed Roof Guidelines

- a. The roof line at the top of a structure should establish a distinctive top to the building.
- b. The roof line should not be flat or hold the same roof line over extended distances. Rather, the roof line should incorporate variations, such as:
 - (1) Offsets or jogs in the plane of the roof;
 - (2) Changes in the height of the exterior wall for flat roof buildings, including parapet walls with variations in elevation or cornices

4. Roof-Mounted Equipment Guidelines

All roof-mounted equipment, except solar collectors, should be screened from view by:

- a. Locating roof-mounted equipment below the highest vertical element of the building, or**
- b. Screening roof-mounted equipment using materials of the same character as the structure's basic materials**

5. Weather Protection Guidelines

All building faces abutting a street or a public parking area should provide weather protection for pedestrians. Features to provide this protection should include:

- a. A continuous walkway at least eight feet wide along the face of the building utilizing a roof overhang, arcade, awnings or canopies**
- b. Awnings and canopies that incorporate the following design features:**
 - (1) Angled or curved surfaces facing a street or parking area**
 - (2) A covering of fabric, or matte finish vinyl**
 - (3) A constant color and pattern scheme for all buildings within the same development**
 - (4) No internal back lighting**

C. Building Location Guidelines

- 1. Within the prescribed setbacks, building location and orientation should complement abutting uses and development patterns.**
- 2. The maximum setback from each street should/shall be 80 feet. Minimum 80 percent of the width of a street-facing façade should/shall meet the setback maximum.**

Response: Per WDO 3.07.01, architectural design criteria for a Type III review are guidelines rather than requirements. The proposed project would fall under the guidelines of 3.07.06. While the proposed building follows many of these guidelines, it does not strictly adhere to all of them.

The exterior building walls are proposed as composite precast sandwich wall panels. The panels contain continuous rigid insulation between layers of concrete in order to meet current Energy Code requirements. The exterior of the panels is textured with four-inch on center horizontal scores along the bottom, a random vertical scoring at the dark colored pilasters and an exposed aggregate finish throughout the remainder of the panels. The panels will be painted as indicated on the Exterior Building Elevations. The proposed design does not include significant horizontal articulation on the Left (north) and Rear (east) walls and the building in general has minimal glazing. The addition of horizontal offsets would not benefit the project, and we believe that faux architectural elements do not add to the overall architectural quality or aesthetics of the building. The building offers an attractive, inviting main entry point. The

remainder of the design mimics the same quality of materials and is designed with functionality and material efficiency in mind. Rooftop equipment is proposed to be screened with metal wall panels matching the Entry/Exit canopy panels in profile as seen on the Exterior Building Elevations.

3.10 Signs (Code sections that do not apply to the proposed project have been omitted)

3.10.10 Permanent Sign Allowances

Permanent signs shall not exceed the number, size, or height specified in the following tables, and shall comply with the other regulations noted in the following tables.

Table 3.10.10B

Permanent Signs in the CG Zone Table 3.10.10B		
Pole Signs ¹		
Frontage	Freeway Overlay (See Figure 3.10L)	Elsewhere

600-999 feet	<ul style="list-style-type: none"> • Maximum 1 per single-tenant site or complex • Maximum 45 feet high • Maximum 300 square feet or 6.7 square feet per foot of actual height, whichever is less 	<ul style="list-style-type: none"> • Maximum 1 per single-tenant site or complex • Maximum 20 feet high • Maximum 100 square feet

Monument Signs ¹		
Frontage	Allowance	

300 feet or more	<ul style="list-style-type: none"> • Maximum 1 per frontage on the same street • Maximum 4 signs per single-tenant site or complex. • Maximum 8 feet high • Maximum 32 square feet each 	

Wall Signs
<ul style="list-style-type: none"> • Minimum 20 square feet • Maximum 6 percent of facade or 200 square feet, whichever is less • Allowance increases by 50 percent if the wall is more than 200 feet from the public right-of-way

Flags
<ul style="list-style-type: none"> • Maximum 2 • Maximum 40 square feet each • Maximum 40 feet high • Exempt from application and permit requirements

<p>1. A monument sign may not be established on the same frontage as a pole sign.</p>

Response: Proposed building mounted signage meets the standards outlined in WDO Table 3.10.10B other than a request for a variance to increase the allowable signage area on the front elevation by 153 sf as described below. Free standing pole mounted and/or monument signs will be designed and permitted separately from this Design Review submittal and will meet all requirements of WDO 3.10, Figure 3.10L and Table 3.10.10B. One 30-foot-high flagpole with a 40 square foot flag pursuant to Table 3.10.10B is proposed in front of the building.

3.11 Lighting (Code sections that do not apply to the proposed project have been omitted)

3.11.02 Standards

A. Full cut-off: All exterior lighting shall be full cut-off or fully shielded. Figure 3.11A illustrates examples of both unacceptable and acceptable fixtures.

B. Heights: Mounting height limits as measured to light fixture underside shall be:

1. **Wall:** 8 feet above finished grade within 5 feet.

a. Within a commercial or industrial zoning district and above a loading bay, berth, or dock, the height limit shall instead be 14.5 feet above vehicular grade.

b. For all developments and uses, ground floor wall-mounted fixtures are exempt if:

- (1) placed under a canopy, fixed awning, roof overhang, secondary roof, or building recess;**
- (2) a ground floor canopy or fixed awning is minimum 96 square feet and 8 feet narrowest dimension;**
- (3) a roof overhang or secondary roof is minimum 72 square feet and 8 feet narrowest dimension;**
- (4) a building recess is minimum 72 square feet and 8 narrowest dimension;**
- (5) an adjacent combination of building recess and, projecting from the main wall plane, either (a) a ground floor canopy or fixed awning or (b) a roof overhang or secondary roof, total minimum 72 square feet and 8 narrowest dimension;**
- (6) a ground floor canopy, fixed awning, roof overhang, secondary roof, or building recess is with maximum 14 feet height clearance above grade; and**
- (7) the fixture is mounted no lower than at the same level as the underside of the ground floor canopy or fixed awning or within and flush with the building recess ceiling.**

- 2. Poles within parking areas: 14.5 feet above vehicular grade within 5 feet of any parking or vehicular circulation area or its curbing. Parking area poles within 24 feet of ROW, greenways, or off-street public bicycle/pedestrian facilities, shall have the public-facing perimeter of the fixture underside with housing or a shield minimum 6 inches high.**
- 3. Other poles: 10 feet above finished grade. Includes poles along walkways, wide walkways, and off-street bicycle/pedestrian facilities where they do not pass through or along parking areas. Within an industrial zoning district operations or storage yard, minimum 20 feet from a lot line the height limit shall instead rise to 20 feet.**

- C. Hue / color temperature: Excepting industrial development, if a fixture uses light emitting diode (LED) technology, it shall emit a warm, yellowish white light instead of cool, bluish white light. A color temperature within the range of 2,700 to 4,000 degrees Kelvin presumptively meets the requirement.**
- D. Property line: Lighting shall not shine or reflect onto (1) ROW, (2) greenways, (3) off-street public bicycle/pedestrian corridors, or (4) adjacent residentially zoned property. Pole-mounted fixtures other than those in parking areas, and wall-mounted fixtures, that abut any of (1)-(3) are exempt if they are sited within 20 feet of any of (1)-(3), and conform to subsection B.1 or 3 above.**
- F. Plan review: The developer or contractor shall submit information, such as a site plan of fixture type installation locations and vendor cut or spec sheets, adequate to demonstrate conformance.**

Response: Proposed project exterior lighting is via full cut-off (shielded) building wall and pole mounted fixtures. Wall mounted fixtures are proposed to meet the height requirements of WDO3.11.02B.1. The Applicant is requesting a variance to increase the height of the parking area light poles as described under the Requested Variances section below. The light fixtures are proposed as 4,000-degree Kelvin LED's to meet 3.11.02C. To comply with 3.11.02D, fixtures have been placed and directed to eliminate noticeable illumination beyond the property lines except as required to light the proposed access drive to Center Street. Site Plans and fixture specifications have been included in the Design Review drawings as required by 3.11.02F.

VOLUME 4: ADMINISTRATION AND PROCEDURES

4.01 Decision-Making Procedures (Code sections that do not apply to the proposed project have been omitted)

4.01.13 Pre-application Conference (Completed August 14, 2025, at Woodburn City Hall)

- A. Applicability:** Prior to submitting an application, the requestor or potential applicant shall request a pre-application conference with City staff to discuss the proposal before submitting any land use application, except as the Director exempts. A pre-application conference is advisory in nature.
- B. Purpose:** The purpose of a pre-application conference is to provide staff from all affected City departments the opportunity to provide the applicant with information on the likely impacts, limitations, requirements, approval standards, fees and other information that may affect the proposal. The Director shall provide a written summary of the pre-application conference.
- C. Requirements for a Pre-application Conference:** To schedule a pre-application conference, a complete City application, accompanying information, and filing fee must be submitted to the Director.
- D. No Waiver of Requirements:** Notwithstanding any representations by City staff at a pre-application conference, staff is not authorized to waive any requirements of the Woodburn Development Ordinance and any omission or failure by staff to recite to an applicant all relevant applicable land use requirements shall not constitute a waiver by the City of any standard or requirement.

Response: While a pre-application conference is not required, the Applicants agent requested one with City staff and submitted preliminary drawings for staff review and comment.

VOLUME 5: APPLICATION REQUIREMENTS

5.03 Type III (Quasi-Judicial) Decisions (Code sections that do not apply to the proposed project have been omitted)

5.03.02 Design Review, Type III

B. Type III Design Review is required for the following:

- 3. Structures greater than 2,000 square feet in the CO, CG, MUV, DDC, and NNC zones.**

5.03.12 Variance

B. Criteria: A variance may be granted to allow a deviation from development standard of this ordinance where the following criteria are met:

- 1. Strict adherence to the standards of this ordinance is not possible or imposes an excessive burden on the property owner, and**
- 2. Variance to the standards will not unreasonably impact existing or potential uses or development on the subject property or adjacent properties.**

Response: The proposed project is for a building greater than 2,000 square feet in the CG zone therefore a Type III Design Review is required per WDO 5.03.02.B.3. The Applicant is requesting the following four variances as allowed by section 5.03.12. A description of the criteria required by 5.03.12B is included in the description of each of the following variances.

Requested Variances:

- 1. Variance to reduce Off-Street Bicycle Parking from 50 to 38 spaces and to locate that parking more than 50 feet from the main entrance:**
Strict adherence to WDO Table 3.05D and 3.05.06 would require the Applicant to develop 50 bike parking spaces with 25 of those covered or sheltered from precipitation. All such bike parking would have to be within 50 feet of the main entrance. Doing so imposes an excessive burden on the Applicant because it would compromise the

Applicant's ability to provide accessible parking stalls as required by the Oregon Structural Specialty Code and ADA.

Placing 50 bike stalls within the parking lot is possible but placing them within 50 feet of the entry would eliminate eight vehicle stalls needed for required accessible parking. In addition, based on observation and experience at other WinCo locations, these accessible parking stalls will be in much higher demand than the 12 additional bike parking spaces.

The Applicant is proposing 38 bike parking spaces, all of which would be covered and within 200 feet of the main building entrance. The path of travel to the building entrance as proposed provides a clearly distinguished and dignified pedestrian route from the bike parking. The bike parking surface will be paved to meet WDO 3.05.06C.1. The proposed bike racks and layout meet the requirements of 3.05.06C.2-3. Signage is not required since the cover structure and bicycle racks will be easily seen from the site entry points as riders approach the building. Reducing the bike stalls from 50 to 38 would not unreasonably impact the subject property or adjacent properties. WinCo owns and operates numerous grocery stores throughout Western Oregon that are similar to the proposed project. Based on the use of bike parking at those locations, there would not be demand for 50 bike stalls by users of the subject property (or adjacent properties). Please reference the attached photos recently taken at WinCo's locations in Roseburg, Albany, and Eugene Oregon. The Roseburg and Albany locations offer considerably less bike parking than is proposed. The Eugene location has roughly the same number of bike stalls as proposed. Bike parking at all three locations is reported by the respective Store Manager's to never be fully utilized. They have not received customer complaints of a lack of bike parking.

2. Variance to reduce Electric Vehicle (EV) Parking by Nine Spaces:

Strict adherence to WDO Table 3.05E and section 3.05.03I would require 5 percent of the required parking stalls to be minimum Level 2 EV charging spaces. This equates to 17 EV stalls. This many EV charging stalls imposes an excessive burden on the Applicant and proposed project because it is not a practical quantity based on feedback from Tesla. Eight Level 3 Tesla Superchargers via separate electrical service are proposed in lieu of this requirement with eight more proposed to be installed once charging demand warrants.

Installation of eight Level 3 charges in lieu of 17 Level 2 chargers provides more charging power, would not unreasonably impact the subject property or adjacent properties and should be considered an upgrade to the WDO EV parking requirement. Tesla, one of the nation's largest EV charging manufacturers and providers, has recommended eight Level 3 charging spaces for this site based on active utilization monitoring of their existing regional charging locations. If EV charging demand increases, additional stalls would be added later as warranted. Level 3 charging provides up to two hundred miles of range in 15 minutes vs. 7-10 miles per 15 minutes of charge time with Level 2 chargers (20x faster charging).

3. Variance to Increase Allowable Signage Area at Front Elevation:

Strict adherence to WDO Table 3.10.10B and section 3.10 would allow 300 square feet of signage on the front and left building elevations because those facades are more than 200-feet from the public right-of-way. It would allow 200 square feet of signage on the rear elevation. The Applicant is meeting this

standard on the left and rear elevations but is requesting a variance to increase the front elevation signage by 153 square feet to 453 square feet. The front of the proposed building is 365 feet from the edge of Stacey Allison Way. Strict compliance with the front elevation signage limit imposes an excessive burden on the Applicant because it forces some of the sign lettering to be reduced to 12-inches high which will be illegible from the public right-of-way.

The proposed increase in signage area would not unreasonably impact the subject property or adjacent properties. The front of the building and associated signage face directly toward both Stacey Allison Way and Interstate 5. It will not be visible from any neighboring residential properties. In addition, the increased legibility will benefit the development and the subject property.

4. Variance to increase Parking Light Pole Height by 10 Feet:

Strict adherence to WDO 3.11.02 would require the Applicant to restrict parking area light poles to 14.5 feet above grade. Doing so imposes an excessive burden because it would necessitate nearly double the number of site lighting poles and fixtures. The additional poles would encroach into parking stalls necessary to meet customer parking demand. The Applicant proposes 24.5-foot-tall light fixtures (to underside of fixture).

Taller parking area light poles would not unreasonably impact the subject property or adjacent properties. Full cut-off or shielded fixtures will still be utilized to prevent light encroachment into Right-of-Ways and adjacent residential properties.

CONCLUSION

Other than the four requested variances, the proposed WinCo Foods grocery store in Woodburn, Oregon adheres to the standards and intent of the applicable Woodburn Development Ordinance as most recently amended on July 22, 2024.

We appreciate the City's consideration of the proposed project and look forward to working with City staff through the Design Review process. Please do not hesitate to contact me with any questions or for additional information.

Sincerely,

Byron T. Hills, NCARB
b.hills architecture, P.C.

EXHIBIT A – TAX MAP

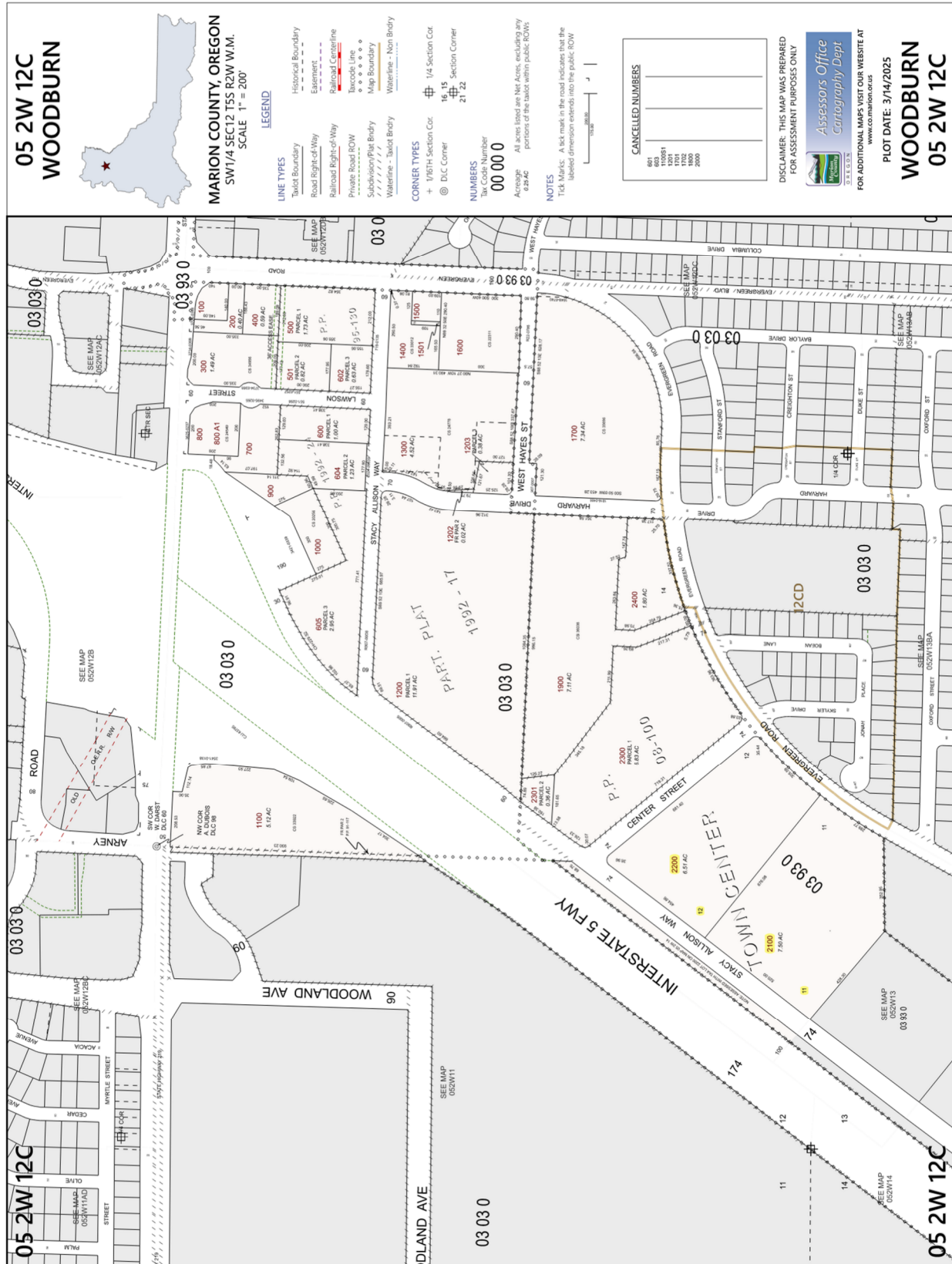


EXHIBIT B – SITE PHOTOS



LOOKING SOUTH ALONG STACEY ALLISON WAY FRONTAGE OF SUBJECT PROPERTY



LOOKING EAST-SOUTHEAST ACROSS SUBJECT PROPERTY FROM STACEY ALLISON WAY



LOOKING NORTH ALONG STACEY ALLISON WAY FRONTAGE OF SUBJECT PROPERTY

EXHIBIT C – BIKE PARKING AT OTHER WINCO FOODS GROCERY STORES



ALBANY, OREGON WINCO FOODS GROCERY STORE BIKE PARKING. BIKE PARKING RARELY USED ACCORDING TO STORE MANAGER.



EUGENE, OREGON WINCO FOODS GROCERY STORE BIKE PARKING. AVERAGE OF 2-3 BIKES PARKED AT ANY GIVEN TIME ACCORDING TO STORE MANAGER.



ROSEBURG, OREGON WINCO FOODS GROCERY STORE BIKE PARKING. BIKE PARKING RARELY USED ACCORDING TO STORE MANAGER.