

Banks High School Addition and Remodel Consolidated Land Use Application

Date: November 2025 (Updated December 2025)

Submitted to: City of Banks
Community Development, Planning & Zoning
13680 NW Main Street
Banks, OR 97106

Applicant: Banks School District #13
42350 NW Trellis Way
Banks, OR 97106

AKS Job Number: 11619



Table of Contents

I.	Executive Summary	2
II.	Site & Application Information	4
III.	Applicable Review Criteria	4
	BANKS MUNICIPAL CODE SECTIONS	4
	Chapter 151: Zoning Code.....	4
	Residential Zoning Regulations	4
	Nonresidential Zoning Regulations	5
	On-site Pedestrian Access and Circulation.....	7
	Landscaping, Screening and Fencing.....	8
	Parking and Loading	12
	Outdoor Lighting	21
	Public Facilities	22
	Applications and Review Procedures.....	24
	Site Design Review	26
	Conditional Use Permits.....	32
	Modifications to Approved Plans and Conditions.....	34
IV.	Conclusion	36

Figures

Figure 1.	Planned Improvements Project Area	3
------------------	--	----------

Tables

Table 1.	Required Parking	15
-----------------	-------------------------------	-----------

Exhibits

Exhibit A:	Preliminary Plans (Updated December 2025)
Exhibit B:	Application Forms and Checklists (Updated December 2025)
Exhibit C:	Property Ownership
Exhibit D:	Washington County Assessor’s Map (Updated December 2025)
Exhibit E:	Mailing Labels of Owners (Updated December 2025)
Exhibit F:	Neighborhood Meeting Documentation
Exhibit G:	CWS Service Provider Letter
Exhibit H:	Preliminary Stormwater Report (Updated December 2025)
Exhibit I:	Pre-Application Conference Notes
Exhibit J:	Transportation Impact Study (TIS)
Exhibit K:	Circulation Diagram (Updated December 2025)
Exhibit L:	Banks Middle School Conditional Use Permit Notices of Decision (CUP-83-12 and MJM-CU 25-01/SDR 25-01) (Updated December 2025)
Exhibit M:	Banks School District Bicycle Parking Memo (Added December 2025)

Banks High School Addition and Remodel Consolidated Land Use Application

Submitted to: City of Banks
Community Development, Planning & Zoning
13680 NW Main Street
Banks, OR 97106

Applicant/Property Owner: Banks School District #13
42350 NW Trellis Way
Banks, OR 97106

Applicant's Consultant: AKS Engineering & Forestry, LLC
12965 SW Herman Road, Suite 100
Tualatin, OR 97062

Contacts: Melissa Slotemaker, AICP
Email: slotemakerm@aks-eng.com
Phone: (503) 563-6151

Site Location: 13050 NW Main Street, Banks, OR 97106

Washington County Assessor's Map: 2N331BC; Tax Lots 6500 and 6900
2N331CB; Tax Lots 2300

Site Size: ±12.3 acres

Zoning Map Designation: Community Facilities (CF)
Medium Density Residential-Low (MDR-Low)

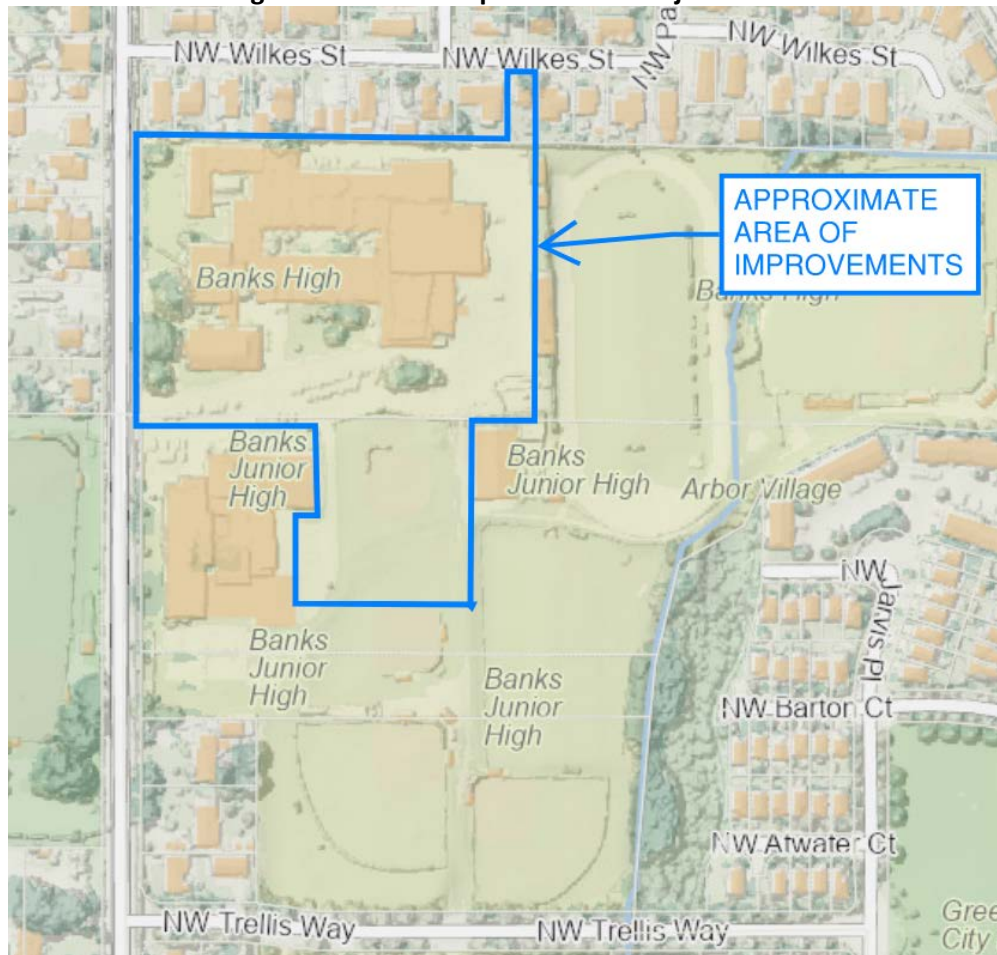
I. Executive Summary

In 2024, Banks School District #13's (BSD) bond measure was approved by voters to finance a number of bond projects that update the BSD schools' facilities which in turn improve the safety, health, and security of the students. Projects funded by the bond include the 20 Year Master Plan, a new auxiliary gymnasium (submitted in a separate land use application, File No. File No. CUP-83-12), and the Banks High School Addition and Remodel. This consolidated land use application addresses the planned improvements of the Banks High School Addition and Remodel. The planned improvements are summarized below:

- Converting the existing north and south wings of the high school to a new two-story high school building that includes specialized elective classrooms on the ground floor and general classrooms on the second floor
- Relocating and updating the district office to be attached to the main high school building with a separate entrance into the office
- Renovating the locker rooms on the east of the high school gymnasium/auditorium
- Updating and expanding the courtyard to the north of the main high school building
- Adding parking to the southwest corner of the high school parcel
- Adding additional landscape islands and pedestrian safety features, such as raised crosswalks, to the shared parking area between the Banks High School and Middle School
- Widening the drive lanes in the shared parking lot to create two access lanes with a dedicated loading zone and a bypass lane
- Adding a new emergency access to the high school via a gravel driveway with an asphalt pedestrian path that connects NW Wilkes Street to the campus
- Phase 2 (contingent upon funding): the emergency access driveway to NW Wilkes Street will be improved to a paved, two-way driveway a concrete pedestrian path

This application addresses the Banks Middle School and Banks High School as one campus. The planned improvements are to both the middle and high school parcels. Emergency access will be added onto a parcel abutting the northeastern corner of the high school parcel. A recent property line adjustment (PLA) has reduced the two school campus parcels in size (see Exhibit C for details), and the improvements will fall in the site area as depicted in Figure 1 below.

Figure 1. Planned Improvements Project Area



This application consolidates the three required permits for the planned improvements:

1. Type III (New) Conditional Use for the planned improvements on the Banks High School and NW Wilkes Street parcels. The public high school and associated use of the access driveway are permitted as a conditional use in the CF and MDR-L zoning districts. There is no existing land use documentation that demonstrates how the school was originally permitted; therefore, this requires a new conditional use permit (CUP) opposed to a modification.
2. Type III Major Modification for the planned improvements on the Banks Middle School parcel. The public middle school is permitted as a conditional use in the CF zoning district. As there is an existing land use decision for the middle school (File No. CUP-83-12) and a subsequent modification application for an auxiliary gymnasium, and the planned improvements result in an increase in paved area greater than 20 percent, a major modification to a CUP is required.
3. Type III Site Design Review (SDR) for the modernization improvements. The improvements involve a conditional use—an institutional use in the Community Facilities (CF) zoning district—which triggers the DR process pursuant to City of Banks (City) Municipal Code 151.252(B)(5).

As depicted in the Preliminary Plans (Exhibit A), there are two phases for the planned high school improvements. The first phase includes replacement of the main high school building, locker room renovations, a new parking lot, a new bus turnaround south of the middle school, and a new emergency access driveway off NW Wilkes Street. Construction for Phase 1 is tentatively planned to begin in Spring

2026 and end in Autumn of 2027. The second phase includes improving the emergency access driveway connecting the eastern parking lot of the high school with NW Wilkes Street to a two-way driveway. Whether the second phase is built depends upon available funding. If there is sufficient funding for the second phase, construction is tentatively planned to occur in the summer of 2027. The Preliminary Plans (Exhibit A) illustrate the Banks Middle and High School campus in both Phase 1 and Phase 2.

This application includes the City application forms, written materials, and preliminary plans necessary for City of Banks staff to review and determine compliance with the applicable approval criteria.

II. Site & Application Information

The high school is located at 13050 NW Main Street, Banks, OR 97106 (Washington County Assessor’s Map 2N331BC, Tax Lot 6900). The site is bordered by NW Main Street to the west, Banks Middle School to the south, athletic fields to the east, and residential dwellings to the north. The high school site is ±6.14 acres in size per the recently approved and recorded PLA.

The middle school is located at Washington County Assessor’s Map 2N331CB, Tax Lot 2300 and is ±6.03 acres in size. The middle school is bordered by residential dwellings to the east and south, NW Main Street to the west, and Banks High School to the north.

The emergency access driveway is planned for the ±0.13-acre Banks-School-District-owned property at 42270 NW Wilkes Street (Washington County Assessor’s Map 2N331BC, Tax Lot 6500). The site is currently being used as a secondary maintenance storage facility and is zoned Medium Density Residential-Low. The lot is surrounded by residential homes to the north, east, and west. Banks High School is to the south.

III. Applicable Review Criteria

BANKS MUNICIPAL CODE SECTIONS

Chapter 151: Zoning Code

Residential Zoning Regulations

(...)

151.036 PERMITTED LAND USES IN RESIDENTIAL ZONES.

The land uses listed in Table 2.2-A as "P" are permitted in the residential zones, subject to the provisions of this Code. Uses listed as "S" are permitted subject to the specific standards in §§ 151.075 through 151.085. Land uses designated with a "CU" require conditional use approval prior to development or a change in use, in accordance with §§ 151.270 through 151.273. Only land uses which are specifically listed as "P", "S" or "CU" in Table 2.2-A and land uses which are approved as "similar" to those listed in this table may be permitted.

Excerpt of Table 2.2-A: Land Uses Permitted in Residential Zones	
Land Use	MDR-L
Public and Private School	CU

Response: An emergency access gravel driveway with a paved pedestrian path is planned on the residentially zoned parcel. An emergency driveway and access are accessory uses to public and private schools; therefore, the driveway is permitted as a conditional use. In Phase 2, the emergency driveway will be improved to a paved two-way public access driveway with pedestrian path. Phase 2 is contingent on funding. This consolidated application includes a new Conditional Use Permit for the Banks High School and accessory driveway use. This standard is met.

151.037 DEVELOPMENT STANDARDS FOR RESIDENTIAL ZONES.

The development standards in Table 2.2-B apply to all uses, structures, buildings, and development allowed in the residential zones.

Excerpt of Table 2.2-B: Development Standards in Residential Zones	
Development Standard	MDR-L
Minimum lot width (feet)	40
Minimum lot depth (feet)	1.5 times the minimum lot width, or 100 feet, whichever is less
Setback Requirements:	
Minimum front yard (feet)	15
Minimum side yard (feet)	5
Minimum street side yard (feet)	10
Minimum rear yard (feet)	10
Minimum Landscaping (percent of total site)	15

Response: An emergency access gravel driveway with a paved pedestrian path is planned on the residentially zoned parcel. The planned improvements will not change the lot size, width, or depth. No buildings are planned for the parcel, so setbacks are not applicable. The emergency driveway will be gravel, and the area remaining outside of the gravel driveway and pedestrian path will be landscaped lawn. In Phase 2, the driveway will be improved to a paved two-lane driveway with concrete pedestrian path. As depicted on the Materials Plans (Exhibit A), about 33 percent of the residential parcel will be improved with landscaping. These standards are met as applicable.

Nonresidential Zoning Regulations

(...)

151.051 COMMUNITY FACILITIES ZONE; PERMITTED LAND USES.

- (A) The land uses listed here are permitted in the CF Zone as shown, subject to the provisions of this chapter. Only land uses that are specifically listed, and land uses that are approved as "similar" to those listed per § 151.006(A) may be permitted.
- (B) Conditional uses permitted. The following uses and accessory uses or expansions of existing uses may be permitted as conditional uses in accordance with the provisions of §§ 151.270 through 151.273:
 - (1) Public park and playground, swimming pool, community center, golf course and similar recreational facilities;
 - (2) Public school and associated facilities; and
 - (3) Government institution; community service facility; caretaker facility.

Response: The subject site includes an existing middle and high school. Public schools and associated facilities are permitted as conditional uses in the CF zoning district. There is no existing land use documentation for the Banks High School. Therefore, a new CUP application is included as part of this application for the planned improvements on the Banks High School parcel and residential parcel where a new emergency access driveway is planned.

The project also includes improvements on the existing Banks Middle School parcel. As the planned improvements include parking lot improvements that result in the paved area increasing by greater than 20 percent of the existing paved area, a major modification of the conditional middle school use is required. Therefore, this application

consolidates a new CUP and a Major Modification to a Conditional Use, which will be processed in the same manner as a Conditional Use application.

(...)

151.054 DEVELOPMENT STANDARDS FOR NONRESIDENTIAL ZONES.

(A) The development standards in Table 2.3-B apply to all uses, structures, buildings, and development allowed in the nonresidential zones.

Excerpt of Table 2.3: Development Standards for Nonresidential Zones	
Development Standard	CF
Minimum lot width and depth	None, unless setbacks are required ¹
Setback Requirements:	
Minimum front yard (feet)	None
Minimum side yard (feet)	
Abutting residential zone	10
All other	None
Minimum street side yard (feet)	None
Minimum rear yard (feet)	
Abutting residential zone	10
All other	None
Maximum building height (feet)	35, or 3 stories, whichever is less
Minimum landscaping (percent of total site) (See §§ 151.155 - 151.157)	10
Build-to line requirement	None

Notes:

1. If a side yard setback is required, a minimum lot width of 25 feet is required. If a rear yard setback is required, a minimum lot depth of 50 feet is required.

Response: The planned improvements include a new building addition to an existing high school. Changes to the lot dimensions are not part of this application; therefore, lot width and depth standards do not apply. As demonstrated by the Preliminary Plans (Exhibit A), the new building is planned to meet the minimum setback and height standards described above. As depicted in the Materials Plans (Exhibit A), approximately 31 percent of the site will be landscaped. Therefore, the applicable standards are met.

(B) Height bonus in the DC Zone. Allowed building height is increased by 15 feet for mixed-use buildings in the DC Zone when at least 75% of the gross floor area of the upper story(ies) is for one or more dwellings as demonstrated on building permit plans.

Response: The subject site is not located within the Downtown Commercial (DC) zoning district. This standard is not applicable.

(C) Build-to line requirement.

(...)

Response: As stated in Table 2.3 above, there is no build-to-line requirement in the CF zoning district. This standard is not applicable.

(D) Civic space bonus. A height bonus of 15 additional feet in building height is available to developments that provide a designated and improved as civic space (plaza, landscaped courtyard, or similar space) that is accessible to the public, pursuant to the following:

(...)

Response: The subject site does not feature a plaza, courtyard, or a similar civic space. Therefore, this standard is not applicable.

On-site Pedestrian Access and Circulation

(...)

151.141 APPLICABILITY.

The standards in this section apply to all new commercial, mixed-use, industrial, civic, and multi-family development.

Response: The subject site features an existing middle and high school, which are considered an institutional (civic) use in the CF zoning district. Therefore, the standards of this section are applicable.

151.142 STANDARDS.

(A) Continuous walkway system. An on-site pedestrian walkway system shall extend throughout the development site and connect to adjacent public sidewalks, if any, consistent with the following:

- (1) For commercial, civic and multi-family developments, on-site walkways shall provide direct connections between primary building entrances and all on-site parking areas, adjacent recreational areas and activity/commercial hubs, future phases of development if applicable, and public rights-of-way.

Response: As demonstrated by the Preliminary Plans (Exhibit A), the planned improvements include pedestrian walkways connecting the high school building addition to the existing buildings that will remain on-site to the north and to the east. Pedestrian walkways also connect the high school buildings to the sidewalk on NW Main Street and connect to striped crosswalks through the shared parking lot between the Banks Middle and High Schools. A pedestrian path is also planned with the new access driveway and provides a pedestrian connection between the school and the public right-of-way on NW Wilkes Street. Therefore, this standard is met.

(...)

- (3) Walkways shall be free from hazards and provide a smooth and consistent surface. The city may require landscape buffering between walkways and adjacent parking lots or driveways to mitigate safety concerns.

Response: As demonstrated by the Preliminary Plans (Exhibit A), the planned walkways will be paved and free from hazards. New landscaping and reseeding of existing landscaping is planned between the new pathways and adjacent parking areas as shown on the Landscape Plans of Exhibit A. Additionally, a courtyard is planned to the north of the main high school building replacement and provides a field area with trees and lawns between pathways. This standard is met.

- (4) The walkway network shall connect to all primary building entrances, consistent with Americans with Disabilities Act (ADA) requirements where required.

Response: As demonstrated by the Preliminary Plans (Exhibit A), new walkways are planned to connect to the primary entrances of the high school in accordance with Americans with Disabilities Act (ADA) requirements. This standard is met.

-
- (B) Except as required for crosswalks, per division (C) below, where a walkway abuts a driveway or street it shall be raised 6 inches and curbed along the edge of the driveway or street. Alternatively, the city may approve a walkway abutting a driveway at the same grade as the driveway if the walkway is physically separated from all vehicle maneuvering areas. An example of such separation is a row of bollards (designed for use in parking areas) with adequate minimum spacing between them to prevent vehicles from entering the walkway.

Response: As demonstrated by the Preliminary Plans (Exhibit A), new walkways abutting the northern and southern boundaries of the shared parking lot are raised and curbed. The planned walkway adjacent to the emergency driveway access off NW Wilkes Street in Phase 1 will be at grade. Bollards with a chain gate will keep vehicles separated from the pedestrian path. In Phase 2, the access driveway will be improved to a paved two-way driveway with curbs that separate the vehicle traffic from the adjacent pedestrian walkway. Therefore, this standard is met.

- (C) Crossings. Where a walkway crosses an on-site parking area or driveway, it shall be clearly marked with contrasting paving materials (e.g., pavers, light-color concrete inlay between asphalt, or similar contrasting material). The crosswalk may be part of a speed table to improve driver-visibility of pedestrians. Painted or thermoplastic striping and similar types of non-permanent applications may be approved for crossings not exceeding 24 feet in length.

Response: As demonstrated by the Existing Conditions Plan (Exhibit A), existing walkways crossing the shared on-site parking areas and driveways are clearly marked with pavement striping. As part of this project, these crosswalks will be improved by raising them and using a contrasting paving material (concrete) to denote the crossing. The pedestrian access connecting NW Wilkes Street to the school campus will have striping across the parking lot connecting the path to an existing entrance to the high school. This standard is met as applicable.

- (D) Walkway width and surface. Walkways shall be constructed of concrete, asphalt, brick or masonry pavers, or other durable surface, meeting ADA requirements, as approved by the City Engineer. Walkways shall be not less than 4 feet in width, except that concrete walkways a minimum of 6 feet in width are required in commercial developments. The city may also require 6-foot-wide, or wider, concrete sidewalks in other developments where pedestrian traffic warrants walkways wider than 4 feet.

Response: As demonstrated by the Preliminary Plans (Exhibit A), new walkways are planned to be constructed of concrete asphalt and meet ADA standards. New walkways are planned to be more than 4 feet wide and are primarily 6 feet or greater in width. This standard is met.

Landscaping, Screening and Fencing

151.155 LANDSCAPING REQUIREMENTS.

- (A) Applicability. The standards in this section apply to all new development requiring Site Design Review per §§ 151.250 through 151.256.

Response: This application includes SDR for planned improvements to the existing Banks Middle and High Schools and to the existing residential home. Therefore, the standards of this section are applicable.

-
- (B) Minimum landscape area. All lots shall conform to the minimum landscape area standard of the applicable zone.

Response: As demonstrated by Table 2.3 above, the minimum landscape area standard in the CF zoning district is 10 percent. The planned improvements include an expansion of the landscaped courtyard to the north of the main high school building replacement. As illustrated on the Materials Plan North in Exhibit A, the courtyard includes newly seeded lawns, outdoor seating areas, and trees. Additional trees are provided along pedestrian walkways and in parking areas. Approximately 31 percent of the site is landscaped. Therefore, this standard is met.

The planned emergency access driveway is zoned Medium Density Residential-Low (MDR-L). Residential zoning regulations are addressed in Sections 151.036 and 151.037. Please refer to the narrative above for responses on how these standards are met.

- (C) Plant selection. A combination of deciduous and evergreen trees, shrubs, and ground covers shall be used for all planted areas, the selection of which shall be based on local climate, exposure, water availability, and drainage conditions, among other factors. When new vegetation is planted, soils shall be amended and irrigation shall be provided, as necessary, to allow for healthy plant growth. The selection of plants shall be based on all the following standards and guidelines:

- (1) Use plants that are appropriate to urban areas and the local climate, exposure, and water availability. The presence of utilities and drainage conditions shall also be considered. The city may rely on Oregon State University Extension Service bulletins/University of Washington Urban Forestry Program guidelines/or other expert sources in evaluating landscape plans.
- (2) Plant species that do not require irrigation once established (naturalized) are required.
- (3) Trees shall be not less than 2-inch caliper at the time of planting. Trees to be planted under or near power lines shall be selected so they will not conflict with power lines at maturity.
- (4) Shrubs shall be planted from 5-gallon containers, minimum, where they are for required screens or buffers, and 2-gallon containers minimum elsewhere.
- (5) Shrubs shall be spaced in order to provide the intended screen or canopy cover within 2 years of planting.
- (6) All landscape areas, whether required or not, that are not planted with trees and shrubs or covered with allowable non-plant material, shall have ground cover plants that are sized and spaced to achieve plant coverage of not less than 75% at maturity.
- (7) Bark dust, chips, aggregate, or other non-plant ground covers may be used, but shall cover not more than 25% of any landscape area. Non-plant ground covers cannot be a substitute for required ground cover plants.
- (8) Where storm water retention or detention, or water quality treatment facilities are proposed, they shall be planted with water-tolerant species.
- (9) Existing mature trees that can thrive in a developed area and that do not conflict with other provisions of this Code shall be retained where specimens are in good health and do not present a hazard.

-
- (10) Landscape plans shall avoid conflicts between plants and buildings, streets, walkways, utilities, and other features of the built environment.
 - (11) Evergreen plants shall be used where a sight-obscuring landscape screen is required.
 - (12) Deciduous trees should be used where summer shade and winter sunlight are desirable.
 - (13) Landscape plans should provide focal points within a development, for example, by preserving large or unique trees or groves or by using flowering plants or trees with fall color.
 - (14) Landscape plans should use a combination of plants for seasonal variation in color and yearlong interest.
 - (15) Landscape plans shall provide for both temporary and permanent erosion control measures, which shall include plantings where cuts or fills, including berms, swales, storm water detention facilities, and similar grading, is proposed.
 - (16) When new vegetation is planted, soils shall be amended and irrigation provided, as necessary, until the plants are established and able to grow on their own.

Response: As demonstrated on the Planting Plan (Exhibit A), the planned landscaping improvements include reseeding any disturbed groundcover on the site, installing a landscaped courtyard to the north of the main building replacement, and adding native trees and shrubs around the pedestrian walkways and in parking lots. Additional details about plant types and locations are found in the Materials Plans and the Planting Plan in Exhibit A. Additionally, 8 trees will be preserved on-site. The Tree Preservation and Removals Plan (Exhibit A) depicts the location of preserved trees. This standard is met.

The planned access driveway is zoned MDR-L. Residential zoning regulations are addressed in Sections 151.036 and 151.037. Please refer to the narrative above for responses on how these standards are met.

- (D) Xeriscape requirements. All industrial and commercial development that is subject to the requirements of this chapter must incorporate the following xeriscape methods in any landscape plan submitted for city review. For residential development, xeriscape methods are encouraged but not required.

Response: This application does not involve industrial or commercial development. This standard is not applicable.

- (E) Landscaping plan required. A landscape plan is required for submittal and approval for all new subject developments. Submittal of a landscape plan drawn to scale shall show information and conform to requirements as follows:
 - (1) The location and height of existing and proposed fences, buffering or screening materials.
 - (2) The location, size, and type of existing trees having a 6-inch or greater diameter measured 4.5 feet above ground.
 - (3) Method of irrigation for proposed trees and plant materials.
 - (4) An arborist's report may be required for sites with mature trees to be preserved and protected during construction.

(5) Other information as deemed appropriate by the Planning Official.

Response: Landscaping plans are included in Exhibit A and provides the items listed above in the Tree Preservation and Removals Plan, Materials Plans, and Planting Plan. The site will be irrigated with sprinklers. The irrigation system will be controlled via automatic timers. The system has also been located with respect to the site's sun and shade conditions, so the irrigation system uses matched precipitation rate spray heads to reduce water use, runoff, and, in turn, lower evaporation of water. The irrigation system water is sourced from the City water supply and is not anticipated to increase the water demand management for the City. The maximum draw for the irrigation system will be 85 gallons per minute. This standard is met.

151.156 SCREENING AND BUFFERING.

- (A) Screening. Screening shall be used to eliminate or reduce the visual impacts of the following uses:
- (1) Commercial and industrial uses when abutting residential uses.
 - (2) Industrial uses when abutting commercial uses.
 - (3) Service areas and facilities, including garbage and waste disposal containers, recycling bins, and loading areas.
 - (4) Outdoor storage areas.
 - (5) Parking areas for 20 or more vehicles.
 - (6) At and above grade electrical and mechanical equipment, such as transformers, heat pumps, and air conditioners.

Response: As demonstrated in the Site Plan in Exhibit A, the new building addition will be setback from the northern property line. Thus, with the separation, screening is not needed for the new building. However, a chain-link fencing (6 feet tall) and a mix of coniferous and deciduous trees will aid in screening portions of the school from neighboring properties. A transformer is also planned on the northwest portion of the high school parcel. The transformer will receive screening as shown on the Materials Plan North in Exhibit A. The middle school bus loading area is screened from the right-of-way by the existing middle school. Therefore, the standards of this section are met as applicable.

The planned access driveway is zoned MDR-L and abuts residential zoning to the east and west. The east and west neighbors have existing fences that screen the planned access driveway and pedestrian path. See the Materials Plan North for details on the existing fence conditions.

(...)

151.157 FENCES.

(...)

- (B) *Permitting and fees.* All new fences and major renovations that change the height or location of an existing fence must have permits. It shall be unlawful for any person, firm, or corporation to construct a fence or modify an existing part thereof without compliance with the standards described herein and first obtaining a permit from the city. A fence permit application signed by the property owner shall include information regarding the type, height, and location of the proposed fence; agreement to maintain the landscape strip in

the front yard (if applicable); and be accompanied by a filing fee to cover the cost of permit review and site inspection.

Response: This standard is understood. The new fence on the north of the high school site will obtain the necessary fence permit prior to construction and pay the applicable fees.

(C) General fence provisions.

- (1) A fence on a corner lot shall not violate the 20-foot vision clearance triangle as specified in § 151.205.
- (2) In no instance shall a fence extend beyond the property line or be constructed higher than 6 feet above the finished grade of the lot. (A lower height fence may be required as described under division (E) below.)
- (3) Fencing shall be installed at least 3 feet from a utility pedestal or electrical transformer and not completely enclose them.
- (4) Requirements specified under divisions (C)(1) through (C)(3) above and the specific restrictions specified under divisions (E) through (G) below are applicable to site landscaping such as hedges, trees, and shrubbery.
- (5) Fencing for residential swimming pools shall comply with the barrier requirements specified in the International One- and Two-Family Dwelling Code, as administered by the Washington County Building Services Division.
- (6) The use of barbed wire, electric fencing (above grade), or other types of injury causing fencing material shall be prohibited in the residential and CF Zones.

Response: As demonstrated on the Materials Plan North (Exhibit A), the planned improvements include adding a chain-link fence between the gaps of the high school buildings—specifically on the north and west side. Three pedestrian gates are planned within the fencing, with two being to the north and one on the west. The proposed fences with pedestrian gates are 6 feet tall. Therefore, the standards of this section are met.

(D) Specific front and street side yard fence restrictions.

(...)

(E) Specific side and rear yard fence restrictions.

(F) Through lot fence restrictions.

Response: Fences are not planned within the front, side, or rear yards of the lot. The site is not a through lot. These standards are not applicable.

Parking and Loading

(...)

151.171 GENERAL PROVISIONS.

- (A) Where the regulations apply. The regulations of this chapter apply to all parking areas in all zones, at all times, whether parking is required by this Code or put in for the convenience of property owners or users.

Response: As demonstrated by the Preliminary Plans (Exhibit A), the planned improvements include the addition of new parking spaces on the southwest corner of the high school site. Therefore, the provisions of this section are applicable.

-
- (B) Occupancy. All required parking areas must be developed in accordance with the requirements of this code prior to occupancy of any structure on the subject site. Where landscaping, screening or other improvements are required pursuant to this Code, all such improvements must be installed and approved by the Planning Official prior to occupancy.

Response: This provision is understood. The parking lot on the high school parcel will be installed prior to students occupying the high school addition.

- (C) Calculations of amounts of required and allowed parking.
- (1) When computing parking spaces based on floor area, parking structures and non-leasable floor spaces, such as storage closets, mechanical equipment rooms, and similar spaces, are not counted.
 - (2) The number of parking spaces is computed based on the primary uses on the site except as stated in division (C)(3), below. When there are two or more separate primary uses on a site, the minimum and maximum parking for the site is the sum of the required or allowed parking for the individual primary uses. For shared parking, see § 151.172(D) below.
 - (3) When more than 20% of the floor area on a site is in an accessory use, the required or allowed parking is calculated separately for the accessory use. An example would be a 10,000 square foot building with a 7,000 square foot warehouse and a 3,000 square foot accessory retail area. The minimum and maximum parking would be computed separately for the retail and warehouse uses.

Response: As described in Table 3.6-A below, a school use requires one parking space per classroom. The planned high school improvements will leave two buildings on-site with seven existing classrooms to remain and will add a new two-story building with 16 new classrooms. In total, Banks High School will have 23 classrooms. The parking lot on-site serves both the Banks Middle and High Schools. Between the two schools there are 38 classrooms. Additionally, parking for the district office will also be served by the shared parking lot between the middle and high schools. Per Table 3.6-A, an office use is a commercial use and requires one parking space per 500 square feet. The new district office is ±3,500 square feet. Therefore, an additional seven parking spaces are needed for the office use. In total, a minimum of 45 parking spaces is required for the site. After the improvements, the planned parking will meet the minimum of 45 parking spaces available between the two schools. See Table 1 below for details. This provision is met.

- (D) Use of required parking spaces. Required parking spaces must be available for residents, customers, or employees of the use. Fees may be charged for the use of required parking spaces. Required parking spaces may not be assigned in any way to a use on another site, except for shared parking pursuant to § 151.172(D).

Response: The existing and planned parking spaces on the site are available to school visitors, students, and employees. This provision is met.

- (E) Proximity of parking to use. Required parking spaces for nonresidential uses must be located on the site of the use or in a parking area that has its closest pedestrian access point within 1,320 feet of the site.

Response: As demonstrated by the Existing Conditions Plan and the Overall Site Plan in Exhibit A, existing and planned parking spaces for the high school and middle school are located on-

site and on the adjacent parcels that are within ±1,320 feet of the schools. This provision is met.

- (F) **Improvement of parking areas.** Motorized vehicle parking is allowed only within garages, carports, and other approved structures, and on driveways or parking lots. For residential uses, tandem parking arrangements are allowed.

Response: Parking for the middle and high schools is provided in off-street parking lots. A new parking lot is planned on the high school parcel, and a parking lot conversion to a bus turnaround is planned on the middle school parcel. There are 10 existing on-street parking spaces on NW Main Street adjacent to Banks High School’s western property line. There are no on-street parking spaces adjacent to Banks Middle School. No changes to the existing on-street parking spaces are anticipated. This provision is met.

151.172 NUMBER OF REQUIRED PARKING SPACES.

Excerpt of TABLE 3.6-A: VEHICLE PARKING SPACE REQUIREMENTS	
Use	Minimum Number of Vehicle Parking Spaces Required
Commercial Uses	
Office uses (professional, medical, clinic)	1 per 500 sf. of floor area
Institutional Uses	
Schools	
Elementary and middle school	1 per classroom
High School	1 per classroom

- (C) **Maximum amount of parking allowed.** In the nonresidential zones, the maximum number of off-street parking spaces allowed per use is:
 - (1) One and one-fifth times the minimum parking required for uses fronting a street with adjacent on-street parking spaces; or
 - (2) One and one-half times the minimum parking required for uses fronting a street with no adjacent on-street parking
- (D) **Shared parking.** Required parking facilities for two or more uses, structures, or parcels of land may be satisfied by the same parking facilities used jointly, to the extent that the owners or operators show that the need for parking facilities does not materially overlap (e.g., uses primarily of a daytime versus nighttime nature; weekday uses versus weekend uses), and provided that the right of joint use is evidenced by a recorded deed, lease, contract, or similar written instrument establishing the joint use.

Response: As described above and demonstrated by the Preliminary Plans (Exhibit A), parking for school uses is based on the number of classrooms, and office uses are based on square footage. The planned improvements include replacing the main high school building and district office. The new building has a total of 23 classrooms, and the district office is ±3,500 square feet. The off-street parking is shared between the middle and high schools, but there is no reduction to the minimum required parking and the properties are all owned and managed by the School District. Between the district office, middle-, and high-schools, a maximum of 59 parking spaces are allowed. There are currently 183 parking spaces on the site. Although the parking lot redesign will result in 52 spaces being relocated across the shared parking area, the total number of parking spaces before and after the planned improvements will remain unchanged at 183 spaces. Therefore, these provisions are met as applicable.

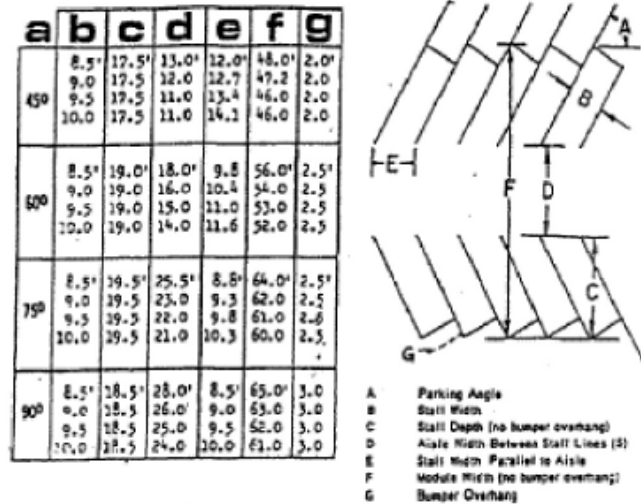
Table 1: Required Parking

	Parking Minimum	Adjacent to On-street Parking	Parking Maximum
Banks HS	23	Y— multiply by 1.2	27.6
District Office	7	Y—multiply by 1.2	8.4
Banks MS	15	N—multiply by 1.5	22.5
Total	45	-	58.5

(...)

151.174 OFF-STREET PARKING DESIGN STANDARDS.

(A) Generally. All off-street parking lots shall be designed in accordance with city standards for stalls and aisles as set forth in the below drawing and table.



(...)

(5) The minimum aisle width for 2-way traffic and for emergency vehicle operations area is 24 feet. The minimum aisle width for emergency vehicle access (one-way traffic) is 20 feet.

(...)

Response: As demonstrated by the Site Plan North (Exhibit A), the drive aisles serving the middle and high schools will be improved to be 20 feet wide. The bus access running north from NW Trellis Way is also planned for emergency vehicle access. This access has a minimum width of 20 feet of drivable surface and has been acknowledged as adequate access by the Fire Chief in a coordination meeting. Additionally, a 20-foot-wide gravel emergency access is planned to connect NW Wilkes Street to the schools. In Phase 2, the emergency access driveway will be improved to a paved two-lane driveway that provides public access from the existing parking areas to NW Wilkes Street. The planned paved driveway is ±24 feet wide in accordance with the requirements of this section. Therefore, this standard is met.

(B) Specifically.

(...)

(4) The stall width for self-parking of long duration is 8.6 feet; for higher turnover self-parking, is 9.0 feet; and for supermarkets and similar facilities is 9.5 to 10.0 feet.

Response: As illustrated on the Site Plan North (Exhibit A), the new parking stalls planned in the shared parking lot are 9 feet in width. This satisfies both the long-term parking of students and staff as well as the higher turnover, self-parking of school visitors. The bus turnaround planned to the south of the middle school has stalls that are 12 feet in width. This is to accommodate larger vehicles such as school buses and emergency vehicles. This standard is met as applicable.

(...)

- (C) *Surfacing. All off-street parking spaces and driveways shall be hard surfaced with concrete, asphaltic cement, or similar surface, which is resistant to dust, and mud. Type and thickness of this hard surface must be approved by the City Engineer.*

Response: As demonstrated by the Site Plan North and South (Exhibit A), the planned parking lot addition and improvements will be paved with asphalt. The emergency access driveway will be gravel surfaced. In Phase 2, the access driveway will be paved with asphalt. This standard is met as applicable.

- (D) *Bumper rails. All required off-street parking spaces, except those for single-family residences, must be equipped with bumper rails located in such a manner as to prevent vehicles from striking landscaping, fences, buildings, or walls, or from overhanging their spaces in a manner which might obstruct aisles, walks, or other spaces or property.*

Response: As illustrated in the Site Plan North (Exhibit A), wheel stops (bumper rails) are planned for the parking spaces directly adjacent to the middle and high school pedestrian paths. This standard is met as applicable.

- (E) *Access and maneuvering.*

- (1) *Groups of more than 4 off-street parking spaces shall be served by a driveway or aisle so that no backing movements or other maneuvering within a street other than an alley will be required.*

Response: The planned improvements include a new parking lot on the high school parcel and a new emergency access driveway on the northeast corner of the site. Neither the parking lot improvements nor the emergency access driveway will result in backing movements within a street. In Phase 2, the emergency access driveway will be converted to a paved two-way driveway with public access. The two-way driveway is not anticipated to result in backing movements within a street. This standard is met.

- (2) *Service drives or aisles to off-street parking areas shall be designed and constructed to facilitate the flow of traffic and to provide maximum safety to pedestrians and vehicular traffic on the site.*

Response: As depicted in the Circulation Diagram (Exhibit K) and further explained in the Transportation Impact Study (TIS) (Exhibit J), existing and planned driveways to off-street parking are designed to facilitate the flow of traffic. Parking lot improvements that are part of the project include widening the driveways to create a queueing lane and a bypass lane and creating a bus turnaround south of the middle school to keep buses out of the shared parking lot. These improvements will reduce congestion in the parking lot and improve the flow of traffic on-site. Additionally, there are designated pedestrian paths on

the middle and high school campus, including striped and raised crosswalks, to ensure pedestrian safety while crossing the parking lot and driveways. This standard is met.

- (3) Service drives or aisles shall be clearly and permanently marked and defined through the use of bumper rails, fences, buildings, walls, paintings, or other appropriate markers and shall not be considered as parking spaces.

Response: The emergency access driveway in the northeast corner of the site is planned to be appropriately marked to ensure it's not considered as parking. Bollards, a chain-link gate, and landscaping will also be installed to help denote that the driveway is not for parking. In Phase 2, the access drive will be curbed and retain the site landscaping. This standard is met.

151.175 PARKING LOT LANDSCAPING.

All the following standards shall be met for parking lots with 4 or more parking spaces. If a development contains multiple parking lots, then the standards shall be evaluated separately for each parking lot.

- (A) A minimum of 10% of the total surface area of subject parking areas, as measured around the perimeter of all parking spaces and maneuvering areas, shall be landscaped. Such landscaping shall consist of canopy trees distributed throughout the parking area. A combination of deciduous and evergreen trees, shrubs, and ground cover plants is required. The trees shall be planned so that they provide a 50% canopy cover over the parking lot when the trees reach maturity.

Response: Over 10 percent of the total surface area of the property's new parking area is planned to be landscaped through a combination of trees, shrubs, and groundcover. At maturity, tree canopy will cover 50 percent or more of the new parking lot. More details on the planting types, location, and schedule can be found on the Planting Plan in Exhibit A. This standard is met as applicable.

- (B) All parking areas with more than 20 spaces shall provide landscape islands with trees that break up the parking area into rows of not more than 10 to 12 contiguous parking spaces. Landscape islands and planters shall have dimensions of not less than 48 square feet of area and no dimension of less than 6 feet, to ensure adequate soil, water, and space for healthy plant growth.

Response: The new parking lot will have landscaped islands to ensure there are rows of parking no greater than 12 contiguous parking spaces. As depicted in the Site Plan North (Exhibit A), the landscaped islands are greater than 6 feet in width to ensure adequate soil, water, and space for healthy plant growth. This standard is met.

- (C) All required parking lot landscape areas not otherwise planted with trees must contain a combination of shrubs and groundcover plants so that, within 2 years of planting, not less than 75% of that area is covered with living plants.

Response: As illustrated on the Planting Plan (Exhibit A), the parking lot landscaped areas not otherwise planted with trees are planted with a combination of shrubs and groundcover. This standard is met.

- (D) Wheel stops, curbs, bollards, or other physical barriers are required along the edges of all vehicle-maneuvering areas to protect landscaping from being damaged by vehicles. Trees shall be planted not less than two feet from any such barrier.

Response: Curbs are provided along all edges of the parking lot to protect the pedestrian walkways from vehicle traffic as well as to protect the landscaping from being damaged by vehicles. This standard is met.

- (E) Trees planted in tree wells within sidewalks or other paved areas shall be installed with root barriers, consistent with applicable nursery standards.

Response: Trees planned for installation will be installed with root barriers. This standard is understood and will be met as applicable.

151.176 PARKING LOT ENCLOSURE AND SCREENING.

- (A) Any portion of an off-street parking area, other than that for a single-family residence, which adjoins a residential zone shall be screened from the adjoining residential area by a sight-obscuring fence having a minimum height of 6 feet, and/or by a dense evergreen landscape screen which attains a height of at least 6 feet within 2 growing seasons.
- (B) Parking lots abutting a public street, sidewalk or walkway shall be screened using a sight-obscuring fence, low-growing hedge or low garden wall to a height of between 3 feet and 4 feet.

Response: The expansion of the parking area on the southwest corner of the high school property abuts NW Main Street—a public street. Shrubs are planned to screen the new parking lot from the public street and sidewalk. See the Planting Plan (Exhibit A) for details. Therefore, these standards are met as applicable.

151.177 BICYCLE PARKING.

All uses that are subject to site design review shall provide bicycle parking, in conformance with the standards in the table below, and following divisions.

- (A) Minimum required bicycle parking spaces. Uses shall provide long- and short-term bicycle parking spaces, as designated in the table below. Where 2 options are provided (e.g., 2 spaces, or 1 per 8 bedrooms), the option resulting in more bicycle parking is used.

USE CATEGORIES	SPECIFIC USES	LONG-TERM SPACES (COVERED OR ENCLOSED)	SHORT-TERM SPACES (NEAR BUILDING ENTRY)
Commercial Categories			
Office	-	2, or 1 per 10,000 sq. ft. of floor area	2, or 1 per 40,000 sq. ft. of floor area
Institutional Categories			
Schools	Grades 6-12	2 per classroom, or per CU review	4 per school, or per CU review

Response: The planned improvements include a new ±3,500-square-foot district office and a new building addition to the Banks High School. In total, the high school will have 23 classrooms. Between the district office (four spaces) and the high school (50 spaces), 54 bike parking spaces are required by code. There are seven existing bicycle parking spaces between the high school and district office. Pursuant to the minimum required bicycle parking table of Section 151.177(A) above, the number of bike parking spaces may also be adjusted per a Conditional Use review. Therefore, in this new CUP application for the Banks High School, Banks School District #13 (Applicant) requests that the number of required bike parking spaces be reduced. Please see the memo provided by the Banks School District (Exhibit M) which provides more detail on the need for a reduction to the

required bike parking, including the existing low use of bicycle parking, student transportation patterns, and the efficient use of public resources. The planned improvements include a total of 22 bicycle parking spaces for the school (and 2 for the District Office) to provide flexibility with fluctuations in enrollment and the potential for more bicyclists. The planned improvements do not include alterations to existing bicycle parking on the middle school parcel. The new bicycle parking at the high school campus will be provided near the main high school entrance, the rear northeast entrance, and the district office entrance (see the Materials Plan North in Exhibit A for details). Therefore, the standards of this section are met as applicable.

- (B) Exemptions. This section does not apply to single-family and two-family housing (attached, detached, or manufactured housing), home occupations, agriculture and livestock uses.

Response: This application is for an institutional use; therefore, the site is not exempt from bicycle parking.

- (C) Location. Bicycle parking should be no farther from the main building entrance than the distance to the closest vehicle space, or 50 feet, whichever is less. Long-term (i.e., covered) bicycle parking should be incorporated whenever possible into building design. Short-term bicycle parking, when allowed within a public right-of-way, should be coordinated with the design of street furniture, as applicable.

Response: The closest vehicle parking space to the main building entrance is 40 feet away. Therefore, the majority of bicycle parking is within 40 feet of the main building entrance as depicted on the Site Plan North (Exhibit A). Sixteen long-term (covered) bicycle parking spaces are provided, and six short-term (uncovered) bicycle parking spaces are provided. The planned improvements do not include alterations to existing bicycle parking on the middle school parcel. This standard is met.

- (D) Design. "Inverted U" or "staple" style racks should be considered. Bicycle racks shall provide a secure point of contact so that both the frame and wheel of a bicycle may be locked to the rack using a standard U lock. Bicycle racks are recommended to provide two points of contact between the rack and the bicycle in order to hold the bicycle securely and prevent pivoting or tipping. Individual "inverted U" or "staple" style racks shall be placed to encourage bicycles to be parked parallel to the rack and achieve maximum capacity. Where multiple racks are placed together, racks shall be placed parallel to each other spaced on 4-foot centers to allow access to both sides of each rack. Racks shall be placed so that a 6-foot bicycle may be parked without interference from nearby walls or fixed objects.

Response: The new high school and district office bicycle parking uses "staple" racks. As illustrated in the Site Plan North (Exhibit A), the staple racks meet the 4-foot by 6-foot dimensional standards. Additional bicycle parking for the middle school is not required. This standard is met as applicable.

- (E) Visibility and security. Bicycle parking for customers and visitors of a use shall be visible from street sidewalks or building entrances, so that it provides sufficient security from theft and damage.

Response: The primary bicycle parking area is visible from the high school's main building entrance, and the district office bicycle parking is visible from the office main entrance as well as the NW Main Street sidewalks. The rear bicycle parking area is adjacent to vehicle parking

spaces and close to existing entries; therefore, the bicycle parking is sufficiently visible and secure. Additional bicycle parking for the middle school is not required. This standard is met as applicable.

- (F) Options for storage. Long-term bicycle parking requirements for multiple family uses and employee parking can be met by providing a bicycle storage room, bicycle lockers, racks, or other secure storage space inside or outside of the building.

Response: This application is for an institutional use; therefore, this standard is not applicable.

- (G) Lighting. For security, bicycle parking shall be at least as well lit as vehicle parking.

Response: As illustrated in the Electrical Lighting Overall Campus Site Plan (Exhibit A), the new high school bicycle parking will be as well lit as vehicle parking.

- (H) Reserved areas. Areas set aside for bicycle parking shall be clearly marked and reserved for bicycle parking only.

Response: The area reserved for bicycle parking will be clearly marked as exclusive for bicycle parking only. This standard is met.

- (I) Hazards. Bicycle parking shall not impede or create a hazard to pedestrians. Parking areas shall be located so as to not conflict with vision clearance standards.

Response: The bicycle parking will not impede or create a hazard to pedestrians or vision clearance standards. The new high school bicycle parking is located between the new main entrance of the high school and the existing gymnasium hallway entrance. The location does not block vision clearance areas. This standard is met.

151.178 OFF-STREET LOADING REQUIREMENTS.

No building or structure subject to the use requirements of this section shall be erected, nor shall any such existing building or structure be altered in any zone so as to increase its gross floor area to an amount exceeding 25% of its existing gross floor area at the time of passage of this chapter, nor shall a change of use occur without prior provisions for off-street loading space in conformance with the requirements of this section.

- (A) *Number of required spaces.* The following numbers and types of berths shall be provided for the specified uses per Table 3.6-C below. The uses specified below shall include all structures designed, intended, or arranged for the use.

Excerpt of TABLE 3.6-C: OFF-STREET LOADING REQUIREMENTS			
Use	Aggregate Floor Area (sq. ft)	Berths Required	Type
Schools	Over 14,000	1	B

- (B) *Design standards.* Required off-street loading space shall be provided in berths which conform to the following minimum specifications.

(...)

- (2) Type "B" berths shall be at least 30-feet long by 12-feet wide by 14 feet 6 inches high, (inside dimensions), with 30-foot maneuvering apron.

Response: As demonstrated in the Site Plan South (Sheet LU-C04), a Type B loading berth is provided to the south of the Banks Middle School that is 30 feet long and at least 12 feet wide. This standard is met.

Outdoor Lighting

151.191 APPLICABILITY.

The standards in this subchapter apply to all new development in all zones.

Response: The planned improvements include the replacement of the main Banks High School building. Therefore, the standards of this section are applicable.

151.192 STANDARD.

All exterior lighting shall be shielded and reflected downward, as shown in Figure 3.7-A, to minimize glare and prevent light trespass on adjacent parcels, other land uses, and street rights-of-way.

Figure 3.7-A



Response: As depicted on the Electrical Lighting Overall Campus Site Plan (Exhibit A), the planned improvements include exterior lighting over exterior entrances and nine new parking lot lights. The NW Wilkes Street access driveway will also be improved with one new light. The planned lighting is shielded and directed downward to avoid glare into other properties or the public right-of-way. Therefore, this standard is met.

151.205 VISION CLEARANCE REQUIREMENTS

- (A) Generally, Corner lots shall have vision clearance as follows.
(...)

Response: The subject site is not a corner lot. This section is not applicable.

Public Facilities

151.215 TRANSPORTATION FACILITIES.

All land use and development applications shall comply with the following standards and procedures for the purpose of protecting the future operation of the Banks transportation system:

- (A) Development standards. The following standards shall be met for all new uses and developments:
- (1) All new lots created, consolidated, or modified through a land division, partition, lot line adjustment, lot consolidation, or street vacation must have frontage or approved access to a public street.
 - (2) Streets within or adjacent to a development shall be improved in accordance with the Banks street design standards (§ 152.052).
 - (3) Development of new streets, and additional street width or improvements planned as a portion of an existing street, shall be improved in accordance with this section, and public streets shall be dedicated to the applicable road authority.
 - (4) New streets and drives shall be paved.

(...)

Response: This application does not involve lot creation, the development of new streets, or street improvements. As discussed in Section 151.174 above, a new emergency access driveway is planned in the northwest corner of the subject site. In Phase 2, this driveway will become a paved two-way driveway that is publicly accessible. These standards are met as applicable.

151.216 CITY MAY REQUIRE TRAFFIC IMPACT ANALYSIS.

- (A) The city may require a traffic impact analysis (TIA) prepared by a qualified professional to determine access, circulation, and other transportation requirements in conformance with TIA results. TIA's shall be required for all proposed development that will generate more than 100 a.m. or p.m. peak hour trips per day or 600 average daily trips. Trip calculation shall be based upon Trip Generation, 8th Edition (2008) published by the Institute of Transportation Engineers.
- (B) Amendments that affect transportation facilities. Amendments to the comprehensive plan and land use regulations which significantly affect a transportation facility shall assure that allowed land uses are consistent with the function, capacity, and level of service of the facility. This shall be accomplished by one of the following:
- (1) Adopting measures that demonstrate that allowed land uses are consistent with the planned function of the transportation facility;
 - (2) Amending the Comprehensive Plan to provide transportation facilities, improvements, or services adequate to support the proposed land uses; such amendments shall include a funding plan to ensure the facility, improvement, or service will be provided by the end of the planning period;

-
- (3) Altering land use designations, densities, or design requirements to reduce demand for automobile travel and meet travel needs through other modes of transportation;
 - (4) Amending the planned function, capacity, or performance standards of the transportation facility; or
 - (5) Providing other measures as a condition of development or through a development agreement or similar funding method, specifying when such measures will be provided.

Response:

The planned improvements include a new building addition, a new parking lot addition, and a new access driveway. The access driveway is planned to be paved and widened to a two-way public driveway in Phase 2, contingent upon funding. The Banks High School Addition and Remodel Project will not change the capacity of the school as the number of classrooms and parking spaces will remain the same. A TIS is included in Exhibit J, and as the traffic engineer explains, the high school improvements are expected to improve traffic flow. Additional transportation and parking management strategies planned for the Banks Middle and High School campus include the following:

- Relocating the middle school student drop-off and pick-up location further east to prevent traffic from queueing onto NW Main Street.
- Widening the parking lot drive aisles to create a drop-off lane and bypass lane.
- Assigning the existing parking spaces between the NW Main Street entrance and exit driveway throat to middle school staff. This eliminates unsafe backing motions into the driveway during student pick-up and drop-off.
- Installing protective measures to improve pedestrian circulation. This includes raised crosswalks between the middle and high schools through the parking lot, sidewalks protected by curbs, wheel stops, landscaping, and ADA-compliant ramps.

Further, the new NW Wilkes Street driveway will provide secondary emergency access. The Phase 2 improvements will connect the shared middle and high school parking lots to NW Wilkes Street. As illustrated in the Circulation Diagram (Exhibit K), this is anticipated to improve traffic flow throughout the campus and help disperse the traffic exiting on NW Main Street. This standard is met.

151.217 WHEN TRAFFIC IMPACT STUDY IS REQUIRED; PREPARATION.

The purpose of this section of the code is to assist in determining which road authorities participate in land use decisions, and to implement Section 660-012-0045(2)(e) of the State Transportation Planning Rule that requires the city to adopt a process to apply conditions to development proposals in order to minimize impacts and protect transportation facilities. This chapter establishes the standards for when a proposal must be reviewed for potential traffic impacts; when a traffic impact analysis must be submitted with a development application in order to determine whether conditions are needed to minimize impacts to and protect transportation facilities; what must be in a traffic impact analysis; and who is qualified to prepare the study.

- (A) *When a traffic impact study is required.* The city or other road authority with jurisdiction may require a Traffic Impact Analysis (TIA) as part of an application for development, a change in use or a change in access. A TIA shall be required when a land use application involves one or more of the following actions:

- (1) A change in zoning or a plan amendment designation;
 - (2) Any proposed development or land use action that a road authority states may have operational or safety concerns along its facility(ies);
 - (3) An increase in site traffic volume generation by 300 Average Daily Trips (ADT) or more;
 - (4) An increase in peak hour volume of a particular movement to and from the state highway by 20% or more; or
 - (5) An increase in use of adjacent streets by vehicles exceeding the 20,000-pound gross vehicle weights by 10 vehicles or more per day;
 - (6) The location of the access driveway does not meet minimum sight distance requirements, or is located where vehicles entering or leaving the property are restricted, or such vehicles queue or hesitate on the state highway creating a safety hazard; or
 - (7) A change in internal traffic patterns that may cause safety problems, such as back up onto a street or greater potential for traffic accidents.
- (B) *Traffic impact study preparation.* A traffic impact analysis shall be prepared by a professional engineer in accordance with the requirements of the road authority. If the road authority is the Oregon Department of Transportation (ODOT), consult ODOT's regional development review planner and OAR 734-051-180.

Response: The planned development does not involve the actions described in (A) above. However, a TIS has been put together by a professional engineer to document the impact the new driveway on the northeast corner of the subject site will have on trip distribution and traffic flow on the school campuses. The TIS is included in Exhibit J.

Applications and Review Procedures

151.230 PURPOSE AND APPLICABILITY.

- (A) **Purpose.** This chapter establishes standard decision-making procedures for the review of land use and development applications, affording the public a means of participating in the local decision-making process in an efficient manner. Table 4.1-A provides a key for determining the applicable review procedure for land use approvals in the City of Banks.
- (B) **Applicability of review procedures.** All land use and development permits and approvals in the city shall follow the procedures contained in this chapter. The procedure "type" assigned to each application governs the decision-making process for that permit or approval. There are 4 types of permit/approval procedures as described below and as identified in Table 4.1-A.
 - (1) **Type I procedure (staff review - zoning checklist).** Type I decisions are made by the City Planning Official, or their designee, without public notice and without a public hearing. Type I decisions are not appealable. A Type I procedure is used in applying city standards and criteria that do not require the use of discretion (i.e., there are clear and objective standards).
 - (2) **Type II procedure (administrative/staff review with notice).** Decisions are made by the City Planning Official, with public notice and an opportunity for appeal to the Planning Commission. Alternatively, the City Planning Official may refer an administrative land use application to the Planning Commission for its review and decision in a public meeting.

- (3) Type III procedure (quasi-judicial review - public hearing). Type III decisions are made by the Planning Commission after a public hearing, with an opportunity for appeal to the City Council; or in the case of a quasi-judicial zone change (e.g., a change in zoning on one property to comply with the Comprehensive Plan), a Type III decision is made by the City Council on recommendation of the Planning Commission. Quasi-judicial decisions involve discretion but implement established policy.
- (4) Type IV procedure (legislative review). The Type IV procedure applies to the creation or revision, or large-scale implementation, of public policy (e.g., adoption of regulations, zone changes, annexation, and comprehensive plan amendments). Type IV reviews are considered by the Planning Commission, which makes a recommendation to City Council. City Council makes the final decision on a legislative proposal through the enactment of an ordinance. Appeals of a City Council Type IV decision go to the Oregon Land Use Board of Appeals (LUBA).

Excerpt of TABLE 4.1-A: SUMMARY OF APPROVALS BY TYPE OF REVIEW PROCEDURE		
Approvals*	Review Procedures	Applicable Regulations
Conditional Use Permits	Type III	§§ 151.270 - 151.273 Conditional Use Permits
Site Design Review	Type I, II or III	§§ 151.250 - 151.256 Site Design Review

*The applicant may be required to obtain building permits and other approvals from other agencies, such as a road authority or natural resource regulatory agency. The city's failure to notify the applicant of any requirement or procedure of another agency shall not invalidate a permit or other decision made by the city under this Code.

Response: This application involves the construction of the Banks High School modernization building addition. Planned improvements include upgrading the main high school building, expanding the courtyard to the north of the main high school building, adding additional parking to the shared parking lot between the Banks Middle and High Schools, and a new emergency access driveway that connects the schools to NW Wilkes Street. Contingent upon funding, the new driveway will be improved from a gravel emergency access to a two-way paved public access driveway. The existing schools are considered a conditional use in the CF zoning district. The planned improvements to the high school require a new Type III CUP as there is no existing documentation for the original high school conditional use. The renovations will also increase the paved area on the existing middle school parcel by greater than 20 percent. Therefore, per Section 151.287(A)(1), the planned improvements are considered a Major Modification to a CUP and will be processed through a Type III procedure. This application also includes SDR for the planned improvements across the middle and high schools as well as the access driveway to NW Wilkes Street.

(...)

151.236 NEIGHBORHOOD CONTACT.

- (A) Purpose and applicability. Applicants for master planned development, subdivision, or site design review on projects involving parcels or lots larger than one acre, and property owner-applicants for zone changes, are required to contact neighboring property owners, residents and tenants and offer to hold a meeting with them prior to submitting an application. This is to ensure that affected property owners are given an opportunity to preview a proposal and offer input to the applicant before a plan is formally submitted to the city,

thereby raising any concerns about the project and the project's compatibility with surrounding uses early in the design process when changes can be made relatively inexpensively.

Response: This application includes a new CUP, Major Modification to a CUP, and a SDR. Therefore, a neighborhood meeting is required.

- (B) Notice. Notice of the meeting must be given in writing and delivered in person, or by certified mail, to all of the property owners, residents and tenants whose property is located within 300 feet of the site, at their addresses of record at the Washington County Assessor's office, at least 14 days before the meeting and at least 21 days before submitting the application to the city. The notice must state the time, place, and purpose of the meeting, including a description of the proposed development.

Response: A notice for the neighborhood meeting was sent on September 23, 2025, and included the required information. A copy of the notice is included in the Neighborhood Meeting Documentation (Exhibit F).

- (C) Meeting place, date, and time. The meeting must be held within the city limits at a location obtained or provided by the applicant with sufficient room for the expected attendance. The meeting place must be accessible to persons with disabilities. It must be scheduled at a date and time reasonably calculated to allow maximum participation by interested property owners, typically weekdays after 6:00pm or on weekends.
- (D) Conduct of meeting. At the meeting, the applicant, or the applicant's agent/representative, must present sufficient information about the proposed development to inform the property owners in attendance of the nature of the proposal and impacts it may have on neighboring properties, including transportation impacts. Persons attending must be allowed to ask questions and make comments. The applicant, or the applicant's agent/representative, must make a sound or video recording or keep written minutes of the meeting that give a true reflection of the matters discussed at the meeting and the views of the participants. The applicant must also make a list of names of persons attending the meeting.
- (E) Filing requirements. Proof of having held the meeting, even if no affected property owners attend, is required and must be submitted to the city with a land use application for the application to be deemed complete. Copies of the following information must accompany the land use application: a copy of the notice mailed, certified mail receipts, all addresses for which notice was mailed (e.g., copy of mailing labels), a certificate of personal service for those persons who were provided notice by personal service (including the date of service and the name of the person who provided service), a record or minutes of the meeting with a list of attendees, and copies of the meeting notice and all other written materials provided prior to or distributed at the meeting.

(...)

Response: A neighborhood meeting was held on October 7, 2025, at Banks Middle School. The neighborhood meeting notes are provided in Exhibit F. Therefore, these requirements are met.

Site Design Review

(...)

151.251 APPLICABILITY.

- (A) Site design review approval is required for new development and redevelopment that meets the thresholds of § 151.252 below. Site design review approval is also required to expand a nonconforming use or development per § 151.355.

Response: This application includes improvements at the Banks Middle and High Schools and a driveway on NW Wilkes Street. Therefore, an SDR application is required.

(...)

151.252 REVIEW PROCEDURE.

- (A) Site design review shall be conducted using the Type II procedure in § 151.232, except those proposals that exceed any one of the thresholds in division (B) below.
- (B) Proposals exceeding any one of the thresholds below shall be reviewed using the Type III procedure in § 151.233:

(...)

- (5) The proposal involves a conditional use (new or expanded);

(...)

Response: This application includes both a new CUP (Banks High School and access driveway) and an expansion to an existing CUP (Banks Middle School). Therefore, the SDR application is being reviewed through a Type III procedure.

151.253 APPLICATION SUBMISSION REQUIREMENTS.

All of the following information is required for site design review application submittal, except where the City Planning Official determines that some information is not pertinent and therefore is not required.

- (A) General submission requirements.
- (1) Information required for Type II or Type III review, as applicable (see §§ 151.230 through 151.238).

Response: The application information required is provided in this narrative and in the exhibits included herein. This requirement is met.

- (2) Public facilities and services impact study. The impact study shall quantify and assess the effect of the development on public facilities and services. The city shall advise as to the scope of the study. The study shall address, at a minimum, the transportation system, including required improvements for vehicles and pedestrians; the drainage system; the parks system; water system; and sewer system. For each system and type of impact, the study shall propose improvements necessary to meet city requirements. The city may require a traffic impact analysis pursuant to § 151.216.

Response: As described in this narrative, the planned improvements will not affect the development of public facilities and services as described above. Therefore, an impact study is not required for the planned improvements. However, a TIS is included in Exhibit J, a Clean Water Services (CWS) service provider letter (SPL) is included in Exhibit G, and a Preliminary Stormwater Report is included in Exhibit H. This requirement is not applicable.

- (B) Site design review information. In addition to the general submission requirements per §§ 151.230 through 151.238, an applicant for site design

review shall provide the following information, as deemed applicable by the City Planning Official. The City Planning Official may request any information they need to review the proposal and prepare a complete staff report and recommendation to the approval body.

- (1) Site analysis/existing conditions map. The site analysis map shall contain all the following information, as the City Planning Official deems applicable:
 - (a) The applicant's entire property and the properties within 100 feet, and the relationship between the proposed development site and adjacent property and development. The property boundaries, dimensions, and gross area shall be identified;
 - (b) Topographic contour lines at 2-foot intervals for slopes, except where the Public Works Director determines that larger intervals will be adequate for steeper slopes;
 - (c) Identification of slopes greater than 15%, with slope categories identified in 5% increments (e.g., 0%-5%, >5%-10%, >10%-15%, >15%-20%, and so forth);
 - (d) The location and width of all public and private streets, drives, sidewalks, pathways, rights-of-way, and easements on the site and adjoining the site;
 - (e) Potential natural hazard areas, including, as applicable, the base flood elevation identified on FEMA Flood Insurance Rate Maps or as otherwise determined through site specific survey, areas subject to high water table, and areas designated by the city, county, or state as having a potential for geologic hazards;
 - (f) Areas subject to overlay zones;
 - (g) Site features, including existing structures, pavement, large rock outcroppings, areas having unique views, and drainage ways, canals, and ditches;
 - (h) The location, size, and species of trees and other vegetation (outside proposed building envelope) having a caliper (diameter) of 6 inches greater at 4 feet above grade (DBH);
 - (i) North arrow, scale, and the names and addresses of all persons listed as owners of the subject property on the most recently recorded deed; and
 - (j) Name and address of project designer, engineer, surveyor, and/or planner, if applicable.

Response: An Existing Conditions Plan is included in the Preliminary Plans (Exhibit A). This requirement is met.

- (2) Proposed site plan. The site plan shall contain all the following information:
 - (a) The proposed development site, including boundaries, dimensions, and gross area;
 - (b) Features identified on the site analysis map that are proposed to remain on the site;
 - (c) Features identified on the site analysis map, if any, which are proposed to be removed or modified by the development;

- (d) The location and dimensions of all proposed public and private streets, drives, rights-of-way, and easements;
- (e) The location and dimensions of all existing and proposed structures, utilities, pavement, and other improvements on the site. Setback dimensions for all existing and proposed buildings shall be provided on the site plan;
- (f) The location and dimensions of entrances and exits to the site for vehicular, pedestrian, and bicycle access;
- (g) The location and dimensions of all parking and vehicle circulation areas (show striping for parking stalls and wheel stops);
- (h) Pedestrian and bicycle circulation areas, including sidewalks, internal pathways, pathway connections to adjacent properties, and any bicycle lanes or trails;
- (i) Loading and service areas for waste disposal, loading, and delivery;
- (j) Outdoor recreation spaces, common areas, plazas, outdoor seating, street furniture, and similar improvements;
- (k) Location, type, and height of outdoor lighting;
- (l) Location of mailboxes, if known;
- (m) Name and address of project designer, if applicable;
- (n) Locations of bus stops and other public or private transportation facilities; and
- (o) Locations, sizes, and types of signs.

Response: An Overall Site Plan with both Phase 1 and Phase 2 illustrated is included in Exhibit A. This requirement is met.

- (3) Architectural drawings. Architectural drawings shall include, as applicable:
 - (a) Building elevations with dimensions;
 - (b) Building materials, colors, and type; and
 - (c) Name and contact information of the architect or designer.

Response: The Exterior Elevations and Materials Board are included in Exhibit A. This requirement is met.

- (4) Preliminary grading plan. A preliminary grading plan prepared by a registered engineer shall be required for development sites one-half acre or larger, or where otherwise required by the city. The preliminary grading plan shall show the location and extent to which grading will take place, indicating general changes to contour lines, slope ratios, slope stabilization proposals, and location and height of retaining walls, if proposed. Surface water detention and treatment plans may also be required.

Response: An Overall Grading Plan is included in Exhibit A. This requirement is met.

- (5) Landscape plan. Where a landscape plan is required, it shall show the following, pursuant to §§ 151.155 through 151.157:
 - (a) The location and height of existing and proposed fences, buffering, or screening materials;

- (b) The location of existing and proposed terraces, retaining walls, decks, patios, shelters, and play areas;
- (c) The location, size, and species of the existing and proposed plant materials (at time of planting);
- (d) Existing and proposed building and pavement outlines;
- (e) Specifications for soil at time of planting, irrigation if plantings are not drought tolerant (may be automatic or other approved method of irrigation), and anticipated planting schedule; and
- (f) An arborist's report may be required for sites with trees of 6 inches DBH or greater that are to be retained and protected.

Response: A Tree Preservation and Removals Plan, Materials Plans, and Planting Plan are included in Exhibit A. This requirement is met.

- (6) Deed restrictions. Copies of all existing and proposed restrictions or covenants, including those for roadway access control.

Response: A copy of the applicable deeds are in Exhibit C. The deeds do not have any restrictions or covenants. This requirement is met.

- (7) Narrative. Letter or narrative report documenting compliance with the applicable approval criteria contained in § 151.255.

Response: This narrative provides responses to the applicable code provisions. This requirement is met.

- (8) Traffic impact analysis, when required by § 151.216.

Response: A TIS is included in Exhibit J. This requirement is met.

- (9) Other information determined by the City Planning Official. The city may require studies or exhibits prepared by qualified professionals to address specific site features or project impacts (e.g., traffic, noise, environmental features, natural hazards, etc.), as necessary to determine a proposal's conformance with this Code.

Response: The additional applicable information is provided in the exhibits herein. This requirement is met as applicable.

151.254 APPROVAL CRITERIA.

- (A) An application for site design review shall be approved if the proposal meets all the following criteria. The city decision-making body, in approving the application, may impose reasonable conditions of approval, consistent with the applicable criteria.

- (1) The application complies with all of the applicable provisions of the underlying land use zone, including, but not limited to, building and yard setbacks, lot area and dimensions, density and floor area, lot coverage, building height, building orientation, and other applicable standards;

Response: As demonstrated in the responses to Section 151.054, the Banks High School Addition and Remodel meets the provisions of the underlying zoning. This criterion is met.

- (2) The proposal includes required upgrades, if any, to existing development that does not comply with the applicable land use zone standards, pursuant to § 151.355 Nonconforming Situations;

Response: The planned improvements comply with the applicable land use zone standards. This criterion is not applicable.

- (3) The proposal complies with all of the community design standards of this chapter as applicable.

Response: The community design standards apply to buildings in the General Commercial (C), DC, and Mixed-Use (MU) zoning districts. The planned improvements are in the CF and MDR-L zoning districts; therefore, this requirement is not applicable.

- (4) For Type III reviews of commercial and residential developments that do not meet clear and objective building design standard in §§ 151.110 and 151.111 or §§ 151.125 through 151.127, the proposal must demonstrate how it meets the stated guideline(s) for those standard(s) not being met.

Response: This application is for a Type III review of an institutional (civic) building addition and associated improvements and not a commercial or residential development. This criterion is not applicable.

- (5) The proposal complies with any applicable regulations of:
- (a) Sections 151.075 through 151.085 Special Use Standards
 - (b) Sections 151.270 through 151.273 Conditional Use Permits.
 - (c) Section 151.355 Nonconforming Situations.

Response: This application includes a new CUP, Major Modification of a CUP, and a SDR. Compliance with Sections 151.270 through 151.273 is discussed later in this narrative. This application does not involve a special use or nonconforming situation. This criterion is met as applicable.

- (6) For nonresidential uses, all adverse impacts to adjacent properties, such as light, glare, noise, odor, vibration, smoke, dust, or visual impact, are avoided; or where impacts cannot be avoided, they are minimized; and

Response: As described above, adverse impacts to adjacent properties are not anticipated. This criterion is met as applicable.

- (7) The proposal meets all existing conditions of approval for the site or use, as required by prior land use decision(s), as applicable.

Response: The Banks High School does not have a prior land use decision for the conditional institutional use on-site. Therefore, a new CUP is included as part of this application.

The Banks Middle School has approved prior land use decisions (CUP-83-12 and MJM-CU 25-01/SDR 25-01). The Banks Middle School Notices of Decision are included in Exhibit L. This Type III application is seeking to modify the parking lot and circulation on the middle school parcel; therefore, this application will be reviewed and approved by the Planning Commission. This criterion is met as applicable.

- (B) Note. Compliance with other city codes and requirements, though not applicable land use criteria, may be required prior to issuance of building permits.

Response: This requirement is understood and will be met.

151.255 ASSURANCES.

Public improvement required as part of a site design review approval shall be subject to the performance guarantee and warranty bond provisions of § 151.218, as applicable.

Response: This requirement is understood.

(...)

Conditional Use Permits

151.270 PURPOSE.

There are certain uses which, due to the nature of their impacts on surrounding land uses and public facilities, require a case-by-case review and analysis. Conditional uses are identified in §§ 151.035 through 151.038 and §§ 151.050 through 151.054. The purpose of this chapter is to provide procedures and standards for permitting conditional uses.

151.271 APPROVALS PROCESS.

The Planning Commission using a Type III procedure, per § 151.233, reviews conditional use applications. Modifications to conditional use permits are subject to §§ 151.285 through 151.288 Modifications to Approved Plans and Conditions.

151.272 APPLICATION SUBMISSION REQUIREMENTS

In addition to the submission requirements for a Type III review under § 151.233, applications for conditional use permits shall include a description of existing conditions, a site plan, and information on any existing and any proposed restrictions or covenants. (For a more detailed description of each item, please refer to § 151.253 Site Design Review Application Submission Requirements). An application for a conditional use permit shall also contain a narrative report or letter responding to the applicable approval criteria in § 151.273.

Response: Exhibits depicting existing conditions and a site plan are included in the Preliminary Plans (Exhibit A). There are no restrictions or covenants on the middle and high school properties. There are also no restrictions or covenants on the emergency access driveway tax lot. A copy of the deeds is included in the ownership information (Exhibit C). This application narrative discusses the applicable approval criteria for CUPs; therefore, these requirements are met.

151.273 CRITERIA, STANDARDS AND CONDITIONS OF APPROVAL.

The Planning Commission shall approve, approve with conditions, or deny an application for a conditional use, including requests to enlarge or alter a conditional use, based on findings of fact with respect to all of the criteria and standards in divisions (A) and (B), below.

(A) *Use criteria.*

- (1) The site size, dimensions, location, topography, and access are adequate for the needs of the proposed use, considering the proposed building mass, parking, traffic, noise, vibration, exhaust/emissions, light, glare, erosion, odor, dust, visibility, safety, and aesthetic considerations;

Response: The site size, dimensions, location, topography, and access are adequate for the needs of the high school renovations. Two existing high school buildings will be preserved. The remaining buildings will be demolished, and the site will be cleared and graded prior to the replacement building, locker room renovation, and new parking being installed. The high school improvements will not increase enrollment or the number of vehicle trips

generated to the school. The number of parking spaces will also not be increased. This requirement is met.

The site size, dimensions, location, topography, and access are adequate for the needs of the middle school improvements. The existing parking lot to the south of the middle school will be updated to create a bus drop-off route that is separate from the shared parking lot of the Banks Middle and High Schools. As depicted on the Circulation Diagram (Exhibit K), this will help facilitate traffic on-site.

The site size, dimensions, location, topography, and access are adequate for the needs of the access driveway. The residential parcel is large enough to accommodate the 20-foot gravel emergency access driveway planned in Phase 1, as well as the 24-foot paved public access driveway planned in Phase 2.

- (2) The negative impacts of the proposed use, if any, on adjacent properties and on the public can be mitigated through application of other Code standards, or other reasonable conditions of approval;

Response: The planned improvements are not anticipated to have negative impacts on adjacent properties or the public. The building renovations will provide modernized facilities to students attending both the Banks Middle and High Schools. The emergency access driveway (Phase 1) provides safe secondary emergency access to the school campuses. Any visual impacts will be mitigated through landscaping between NW Main Street and the schools, as well as through existing fencing. This requirement is met.

The Phase 2 driveway is anticipated to increase traffic on NW Wilkes Street during A.M. and P.M. hours surrounding school drop-off and pick-up. Landscaping and screening requirements in Sections 151.155 and 151.156 will mitigate any visual impacts of the improvements to adjacent parcels. It's understood that the Phase 2 driveway may be subject to conditions of approval.

- (3) All required public facilities, including water, sanitary sewer, and streets, have adequate capacity or are to be improved to serve the proposal, consistent with city standards; and

Response: All required public facilities have adequate capacity as discussed in the pre-application meeting with City staff. As depicted in the Composite Utility Plan (Exhibit A), the replacement building will connect into existing utility lines to the north, south, and west. See the Composite Utility Plan in Exhibit A for more details. This requirement is met.

- (4) A conditional use permit shall not allow a use that is prohibited or not expressly allowed under this chapter; nor shall a conditional use permit grant a variance without a variance application being reviewed with the conditional use application.

Response: Pursuant to Section 151.051, public schools and associated facilities are permitted as a conditional use in the CF and MDR-L zoning districts. Therefore, the middle and high school improvements are permitted as a conditional use, and this requirement is met.

- (B) Conditions of approval. The city may impose conditions that are found necessary to ensure that the use is compatible with other uses in the vicinity, and that the negative impact of the proposed use on the surrounding uses and

public facilities is minimized. These conditions include, but are not limited to, one or more of the following:

- (1) Limiting the hours, days, place, and/or manner of operation;
- (2) Requiring site or architectural design features which minimize environmental impacts such as noise, vibration, exhaust/emissions, light, glare, erosion, odor, and/or dust;
- (3) Requiring larger setback areas, lot area, and/or lot depth or width;
- (4) Limiting the building or structure height, size, lot coverage, and/or location on the site;
- (5) Designating the size, number, location, and/or design of vehicle access points or parking and loading areas;
- (6) Requiring street right-of-way to be dedicated and street improvements made, or the installation of pathways or sidewalks, as applicable;
- (7) Requiring landscaping, screening, drainage, water quality facilities, and/or improvement of parking and loading areas;
- (8) Limiting the number, size, location, height, and/or lighting of signs;
- (9) Limiting or setting standards for the location, type, design, and/or intensity of outdoor lighting;
- (10) Requiring berms, screening, or landscaping and the establishment of standards for their installation and maintenance;
- (11) Requiring and designating the size, height, location, and/or materials for fences;
- (12) Requiring the protection and preservation of existing trees, soils, vegetation, watercourses, habitat areas, drainage areas, historic resources, cultural resources, and/or sensitive lands; and
- (13) Requiring improvements to water, sanitary sewer, or storm drainage systems, in conformance with city standards.

Response: This requirement is understood.

- (C) Approved conditional uses and uses existing prior to the effective date of this chapter and now classified in this chapter as a conditional use must apply for a new conditional use permit prior to any change in the use or in lot area, or alteration or enlargement of any structure. The City Planning Official may waive this requirement for minor alterations, i.e., those that will have no impact on neighboring properties and/or the general public.

Response: The planned improvements will modify the existing CUP of Banks Middle School and a new CUP will be submitted for the high school. Therefore, this Consolidated Land Use Application includes a new CUP and a Major Modifications of a CUP—processed as a Type III CUP—for both the middle and high school improvements. This requirement is met.

Modifications to Approved Plans and Conditions

151.285 PURPOSE.

The purpose of this section is to provide an efficient process for modifying land use decisions and approved development plans, in recognition of the cost and complexity of land development and the need to conserve city resources.

151.286 APPLICABILITY.

This chapter applies when an applicant proposes to modify an approved application or condition of approval.

Response: The planned improvements propose to modify the existing Banks Middle School which has an approved CUP. Therefore, the requirements of this section apply.

151.287 MAJOR MODIFICATIONS.

(A) Major modifications. The Planning Commission reviews applications for major modifications through the quasi-judicial procedure under § 151.233. Any 1 of the following changes constitutes a major modification:

- (1) A change in land use, from a less intensive use to a more intensive use, as evidenced by, an estimated increase in automobile or truck trips (peak and/or average daily trips), an increase in hours of operation, an increased demand for parking, additional paved area, or similar factors, where the increase is 20% or more;

(...)

Response: The planned improvements include a Major Modification to the existing middle school: a conversion of the existing faculty parking lot into a bus turnaround that results in an increase in paved area that is greater than 20 percent of the existing paved area. This application includes narrative responses for a Major Modification to Banks Middle School. This requirement is met.

(B) Major modification applications; approval criteria. Requests for major modifications shall conform to all of the following procedures and criteria:

- (1) The applicant shall submit an application form, filing fee, a narrative or letter describing the modification, and a site plan using the same plan format as in the original approval. The city may require other relevant information, as necessary, in evaluating the request;

Response: This application includes form and fee, an application narrative, and a site plan in Exhibit A. These requirements are met.

- (2) The application shall be subject to the same approval criteria used for the initial project approval; except that a modification adding a conditional use to a project approved without a conditional use shall require findings in conformance §§ 151.270 through 151.273;

Response: This application is subject to the same approval criteria used for the initial Banks Middle School land use decision as well as the CUP approval criteria. Responses to the applicable approval criteria are included in this application narrative. This requirement is met.

- (3) The scope of review shall be limited to the modification request. Notice shall be provided in accordance with §§ 151.230 through 151.238; and

Response: This requirement is understood and will be met.

- (4) The Planning Commission shall approve, deny, or approve with conditions an application for major modification based on written findings on the applicable Code criteria, which shall be the same as for the original land use approval (e.g., subdivision, site design review, conditional use, etc.).

Response: This provision is understood.

IV. Conclusion

The required findings have been made, and this written narrative and accompanying documentation demonstrate that the application is consistent with the applicable provisions of the City of Banks Municipal Code. The evidence in the record is substantial and supports approval of the application.

Exhibit A: Preliminary Plans (Updated December 2025)

Exhibit B: Application Forms and Checklists **(Updated December 2025)**

Exhibit C: Property Ownership

**Exhibit D: Washington County Assessor's Map
(Updated December 2025)**

Exhibit E: Mailing Labels of Owners (Updated December 2025)

Exhibit F: Neighborhood Meeting Documentation

Exhibit G: CWS Service Provider Letter

Exhibit H: Preliminary Stormwater Report (Updated December 2026)

Exhibit I: Pre-Application Conference Notes

Exhibit J: Transportation Impact Study (TIS)

Exhibit K: Circulation Diagram (Updated December 2025)

**Exhibit L: Banks Middle School Conditional Use
Permit Notices of Decision
(CUP-83-12 and MJM-CU 25-01/SDR 25-01)
(Updated December 2025)**

**Exhibit M: Banks School District Bicycle Parking
Memo (Added December 2025)**
