



City of Canby

Staff Report File #: CUP 24-02 Canby Adult Center Relocation

HEARING DATE: Mach 10, 2025
STAFF REPORT DATE: February 28, 2025
TO: Planning Commission
STAFF: Brianna Addotta, AICP, Associate Planner

Applicant Request

The applicant, Canby Adult Center (CAC), is requesting approval of a Conditional Use Permit to relocate their operations from their current location at 1250 S. Ivy St. to 1520 N. Holly St. A Conditional Use Permit is required because 1520 N. Holly St. is zoned R-1, Low Density Residential. Canby United Methodist Church (CUMC) currently operates at the N. Holly site and intends to continue doing so. Preliminary partition approval has been granted to divide the property (approximately shown by the dashed line on the site map). Canby Adult Center will own the parcel with the existing building and Canby United Methodist Church will own the other parcel. The two parties will maintain agreements to share the facilities and parking lot.

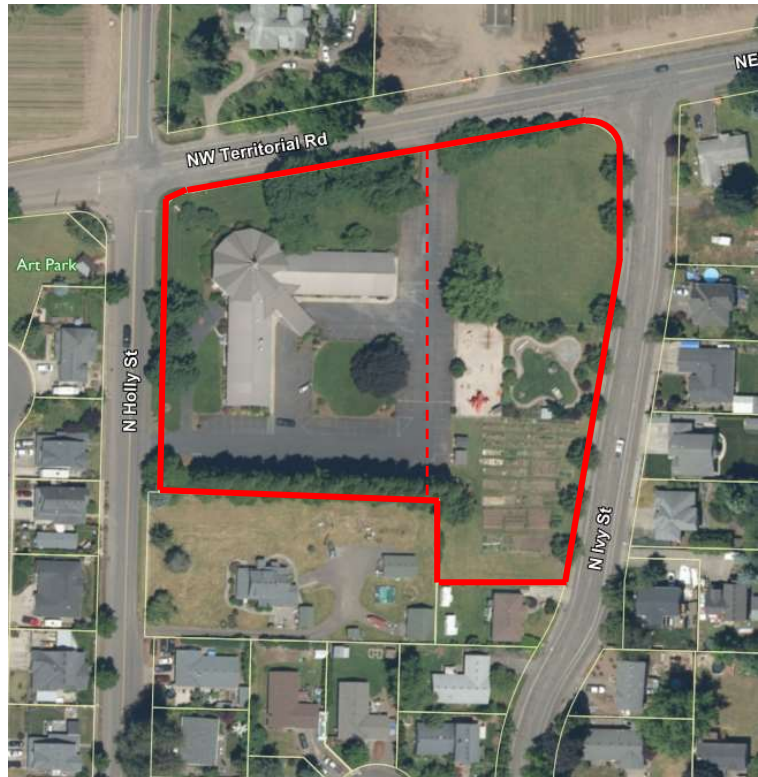


Figure 1. Site Map

Staff Recommendation

Based on the application submitted and the facts, findings and conclusions of this Staff Report, Planning Staff recommend **Approval** of CUP 24-02 pursuant to the conditions of approval identified in Section V of this Staff Report.

Property/Owner Information

This information reflects the property as one lot. Information about both newly created lots will be available after plat recordation.

| | |
|-----------------------------|---|
| Location: | 1520 N. Holly St. |
| Tax Lot : | 31E28CD01700 |
| Property Size: | 3.98 acres |
| Zoning: | R-1 Low Density Residential |
| Owners: | Canby Methodist United Church, (pending) Canby Adult Center |
| Applicant: | Canby Adult Center |
| App. Representative: | Bob Price |
| Application Type: | Conditional Use Type III |
| City File Number: | CUP 24-02 |

Attachments

A. Applicant Submittal

1. Land Use Applications Forms
2. Project Narrative
3. Site Plan
4. Traffic Analysis Letter (TAL)
5. Activity Schedule
6. Pre-Application and Neighborhood Meeting Materials

I. INTRODUCTION

Existing Conditions

The project site is located at the southeast corner of N Holly Street and NW Territorial Road and is the existing location of the Canby United Methodist Church (CUMC). The site is 3.9 acres and is developed with a 13,890 square foot building and a 103-space parking lot, as well as a community garden, playground and a few accessory buildings used primarily for storage. The site was developed before being annexed into City limits in 1997 and the church use was considered a preexisting conditional use. In 1999 the CUMC requested and received approval to modify their conditional use permit to include childcare services. In 2024 the site received preliminary approval to be divided into two parcels, so that ownership of the building may be transferred to the Canby Adult Center while the CUMC retains ownership of the second parcel which currently has a community garden and a few small accessory buildings on it. This division will not functionally affect the operations on site, as the two parties will sign a shared facilities agreement and the CUMC will continue to operate out of the existing building for the foreseeable future.

Project Overview

The Canby Adult Center intends to move operations from their current location at 1250 S. Ivy St. to the existing facility at 1520 N. Holly St. Because 1520 N. Holly St. is zoned R-1, low density residential, a Conditional Use permit is required in order for the CAC to begin operations. It is understood that if Conditional Use approval is granted, the CAC would subsequently apply for permits related to minor physical modifications to the site including additional of a walk in refrigeration unit, an emergency generator, and construction of an entry vestibule.

Applications

A Type III Conditional Use application has been submitted in order for the CAC to begin operating at 1520 N. Holly St., a property zoned R-1 low density residential.

II. ANALYSIS AND FINDINGS

A. Applicable Criteria

Applicable criteria used in evaluating this application are listed in the following sections of the City of Canby's Land Development and Planning Ordinance (Chapter 16 of the CMC):

- 16.08 General Provisions
- 16.10 Off-street Parking and Loading
- 16.16 R-1, Low Density Residential
- 16.43 Outdoor Lighting Standards
- 16.49 Site and Design Review
- 16.50 Conditional Uses
- 16.89 Application and Review Procedures

B. Facts and Findings

The following analysis evaluates the proposed project's conformance with applicable approval criteria and other municipal code sections, as listed above in Section A Sections of the CMC are analyzed in the order that they appear in the code.

Chapter 16.08: General Provisions

Section 16.08.150 *Traffic Impact Study*

This section of the CMC outlines requirements for studying the transportation impacts of a proposed project.

Finding 1: Scoping performed for the proposed project—based on the type, scale, and location of the project—determined that a Transportation Analysis Letter (TAL) would be required to analyze traffic impacts of the project. This report is attached to this Staff Report as Attachment A.4. The paragraphs below only summarize the findings of the TAL; please see the TAL for detailed analysis.

The CAC is proposed to be relocated from its current location at the northeast corner of the intersection at S Ivy Street and SE 13th Avenue to the southeast corner of the N Holly Street and NW Territorial Road intersection, where it will create a joint operating agreement for use of the existing church building located at 1520 N Holly Street. The Adult Center will take over the facilities of the existing church, while allowing the CUMC to continue to use the existing facilities until the Church determines its future.

The number of new vehicle trips generated by the previous and proposed uses were estimated using programming information provided by the applicant. The proposed combined uses at 1520 N Holly Street will be expected to generate 40 a.m. peak trips and 50 p.m. peak hour trips, while the previous uses at separate locations also generated 40 a.m. peak hour trips and 50 p.m. peak hour trips,

resulting in no change in the total peak hour trips on the transportation system as a whole. This is demonstrated in Table 1.

TABLE 1: NET TRIP GENERATION FOR THE PROPOSED USE

| USE | AM PEAK | | | PM PEAK | | |
|--|---------|-----|-------|---------|-----|-------|
| | IN | OUT | TOTAL | IN | OUT | TOTAL |
| EXISTING USES | | | | | | |
| CHURCH USES (1520 N HOLLY STREET) | 30 | 3 | 33 | 0 | 0 | 0 |
| CANBY ADULT CENTER (1250 S IVY STREET) | 6 | 1 | 7 | 5 | 45 | 50 |
| TOTAL (SEPARATE LOCATIONS) | 36 | 4 | 40 | 5 | 45 | 50 |
| PROPOSED USE (COMBINED AT 1520 N HOLLY STREET) | 36 | 4 | 40 | 5 | 45 | 50 |
| NET CHANGE (PROPOSED USE - PREVIOUS USE) | 0 | 0 | 0 | 0 | 0 | 0 |

The impact that the rerouted trips will have in moving from the current location of the Canby Adult Center to the new location at 1520 N Holly Street was also analyzed. For this analysis, the 7 existing a.m. peak trips and 50 existing p.m. peak trips were rerouted from the existing building to the proposed location and reassigned to the nearby roadway network. The reassigned routes for the trips were based on the travel patterns from the City of Canby travel demand model. No change was made to the travel route of the trips associated with the existing church uses, since those trips will remain the same.

TABLE 2: WEEKDAY PEAK HOUR TRIP ASSIGNMENT AT INTERSECTIONS

| INTERSECTION | NET NEW AM PEAK TRIPS TO INTERSECTION | NET NEW PM PEAK TRIPS TO INTERSECTION |
|-------------------------------------|---------------------------------------|---------------------------------------|
| N HOLLY STREET/ NW TERRITORIAL ROAD | 1 | 5 |
| N HOLLY STREET/ KNIGHTS BRIDGE ROAD | 2 | 15 |
| N HOLLY STREET/ NE 4TH AVENUE | 0 | 5 |
| N IVY STREET/ NW TERRITORIAL ROAD | 3 | 20 |
| N IVY STREET/ NE 4TH AVENUE | 1 | 0 |
| OR 99E/ IVY STREET | -1 | -10 |
| S IVY STREET/ 13TH AVENUE | 0 | 0 |

TABLE 3: WEEKDAY PEAK HOUR TRIP ASSIGNMENT ALONG ROADWAY SEGMENTS

| CORRIDOR | CORRIDOR LIMITS | NET NEW AM PEAK TRIPS TO CORRIDOR | NET NEW PM PEAK TRIPS TO CORRIDOR |
|------------------|--|---|---|
| TERRITORIAL ROAD | West of Project site driveway | 1 | 5 |
| | East of Project site driveway | 3 | 20 |
| N HOLLY STREET | North of Project site driveway | 1 | 5 |
| | Project site driveway to Knights Bridge Road | 2 | 15 |
| | South of Knights Bridge Road | 1 | 10 |
| | Territorial Road to NE 4 th Avenue | 1 | 0 |
| N IVY STREET | NE 4 th Avenue to OR 99E | -1 | -10 |
| | OR 99E to existing Adult Center Driveway on Ivy | -2 | -20 |
| | South of existing Adult Center Driveway on Ivy | 0 | 0 |
| | | | |

The model estimated that 40 percent of the trips will start or end south of the OR 99E/S Ivy Street intersection, 40 percent to/from north of the OR 99E/S Ivy Street intersection, and 20 percent to/from areas east of the proposed site along S Township Road.

Using these distributions, the existing trips for the Canby Adult Center were rerouted. Table 2 shows the net new trips at relevant intersections. Table 3 shows the trips that would be reassigned to relevant road segments should the CAC be relocated to 1520 N Holly Street. Some road segments will see additional peak trips, and some will see fewer. As Tables 2 and 3 show, no intersections or road segments will see more than 20 additional new net trips if the CAC were relocated from the S Ivy Street location to the N Holly Street location. This number of new net trips suggests that off-site traffic impact analysis is not warranted. The proposed combined uses are therefore consistent with the transportation approval criteria 16.08.160.F (i.e., adopted intersection mobility standards).

The site has frontage along N Holly Street and NE Territorial Road. NE Territorial Road has an estimated 44-foot existing paved width along the frontage of the site, with one travel lane in each direction and bike lanes, and an on-street parking lane. N Holly Street has an estimated 45-foot existing paved width along the frontage of the site, with one travel lane in each direction and on-street parking. Both frontages lack a sidewalk, although there is an existing sidewalk on the opposite side of N Holly Street.

Section 16.08.160 Safety and Functionality Standards

The City will not issue any development permits unless the proposed development complies with the City's basic transportation safety and functionality standards, the purpose of which is to ensure that development does not occur in areas where the surrounding public facilities are inadequate. At the time of development permit application submittal, the applicant shall demonstrate that the property has or will have the following:

- A. Adequate street drainage;

Finding 2: The property has already been developed and street drainage is not expected to be impacted by this conditional use permit.

B. Provides safe access and clear vision at intersections;

Finding 3: Access to the site is proposed to remain via two existing driveways, one to N Holly St. and one to NE Territorial Rd.

The existing driveway on N Holly Street will be maintained and will be approximately 220 feet from NE Territorial Road to the north and approximately 180 feet from the nearest existing off-site driveway to the south, complying with the spacing standard.

The existing driveway on NE Territorial Road will also be maintained and will be approximately 270 feet from NE Territorial Road to the west and approximately 180 feet from N Ivy Street to the east, also complying with the spacing standard.

C. Public utilities are available and adequate to serve the project;

Finding 4: The existing building is connected to public utilities, and they are sufficient to serve both uses on site. Utility providing agencies were sent the application package and comments were requested as part of this review, no comment have been provided.

D. Access onto a public street with the minimum paved widths as stated in Subsection E below.

Finding 5: Access to the site is proposed to remain via two existing driveways, one to N Holly Street and one to NE Territorial Road. All driveways will continue to be full access, allowing for ingress/egress to the on-site parking areas for vehicles and bicycles.

E. Adequate frontage improvements as follows: ... For collector and arterial streets, a minimum paved width of 20 feet along the site's frontage.

Finding 6: The proposed site has frontage along N Holly Street and NE Territorial Road, which are classified as Collector streets and subject to Subsection E.2. NE Territorial Road has an estimated 44-foot existing paved width along the frontage of the proposed site, with one travel lane in each direction and bike lanes, and an on-street parking lane. N Holly Street has an estimated 45-foot existing paved width along the frontage of the proposed site, with one travel lane in each direction and on-street parking.

F. Compliance with mobility standards identified in the Transportation System Plan (TSP). If a mobility deficiency already exists, the development shall not create further deficiencies.

Finding 7: While the proposed combined uses results in no new net peak trips on the transportation system, the estimated existing site generated traffic for the Canby Adult Center (i.e., 7 existing a.m. peak and 50 existing p.m. peak trips) was rerouted from the existing building to the proposed location at 1520 N Holly Street and reassigned to the nearby roadway network. No change was made to the travel routes of the trips associated with the existing church uses since those trips will remain.

All intersections and segments will see fewer than 20 new net peak hour trips after the travel routes of these existing trips are adjusted (i.e., the trips already existed on the transportation system and were rerouted to the new site with the proposed project).

Therefore, the proposed combined uses at 1520 N Holly Street met criteria for a TAL level of analysis. Peak hour intersection operations will not be degraded by proposed developments that generate fewer than 25 a.m. and/or p.m. peak trips since these trips are distributed system wide and do not all impact a single location, including intersections and roadway segments. Proposed developments that meet the TAL criteria are deemed consistent with this approval criteria (i.e., adopted intersection mobility standards).

For the above reasons, Planning Staff finds that this request is consistent with applicable provisions of the CMC.

Chapter 16.10: Off-Street Parking and Loading

This chapter of the CMC identifies requirements for vehicular parking, bicycle parking, loading facilities, and access standards when new development occurs.

Finding 8: There are existing parking facilities on-site that include 103 spaces and an additional 8 handicapped spaces. The division of the property will split the easternmost drive aisle of the parking lot effectively in half, but the two parcels will share the parking lot and are prepared to record a shared parking and facilities agreement.

Table 16.10.050 states the minimum standards for off-street vehicle parking for “places of public assembly including churches” is 1 space for every four seats or eight feet of bench length. The building has a seating capacity of 250, which means that 63 parking spaces are required to serve the use. ($250/4 = 62.5$). The applicants have also provided a schedule of activities for the CAC that show CAC and CUMC activities largely will not overlap, and when they do, combined attendance numbers aren’t expected to exceed approximately 70 at any given time. The schedule of activities is provided as Attachment A.5 to this report.

As a condition of approval for this project (see Condition #1) the applicant has agreed to restripe the parking lot, given the faded condition of the paint lines currently there. The applicant has provided an estimate of the cost of the restriping work, and a financial assurance deposit in the amount of the estimate. The deposit shall be refunded after the restriping work is completed and inspected by city staff.

For the above reasons, Planning Staff finds that this request is consistent with applicable provisions of Chapter 16.10 and sufficient off-street parking will be provided.

Section 16.10.060 Off-street loading facilities

Finding 9: Loading berths are not required for assembly uses.

Section 16.10.070 *Parking lots and access.*

Finding 10: The configuration of the parking lot is existing and will not be changed under this conditional use permit. It will be restriped as a condition of approval.

The existing accesses will remain and not be modified by the proposed conditional use.

Section 16.10.100 *Bicycle parking*

Finding 11: Per Table 16.10.100, religious institutions must provide one bicycle parking space per 40 seats. Community/senior centers do not have a bicycle parking standard, but staff believe the need would be comparable to a religious facility. Given that there is a 250-seat capacity for the building, 6 bicycle parking spaces are required ($250/40=6.25$). There are currently 8 bicycle parking spaces available onsite. The standards of CMC 16.10.100 are met.

Chapter 16.16: R-1 Low Density Residential

The purpose of this chapter is to provide regulations for the R-1 zone. The chapter regulates permitted uses, setbacks, and more.

Section 16.16.020 *Conditional Uses*

Finding 12: Conditional uses in the R-1 zone include institutional uses such as schools, hospitals, churches and day care facilities. Staff believe that while a senior community center is not specifically listed, it is similar to these uses and would reasonably be accepted under 16.16.020.Q., Other developments customarily found within a residential zone, as determined by the Planning Commission. The property where the CAC is currently located is also zoned R-1.

Conditional uses need to show their proposed use will be compatible with the surrounding neighborhood. Compliance with conditional use criteria is addressed in the Findings for CMC Chapter 16.50, below.

Section 16.16.030 *Development Standards*

Finding 13: The property is already developed and complies with the R-1 standards, as shown on the site plan included in Attachment A.3. Any work proposed in the future would be reviewed through a Type 1 site plan process and adherence to the standards would be evaluated at that time.

Chapter 16.50: Conditional Uses

Section 16.50.010 *Authorization to grant or deny conditional uses.*

A conditional use listed in this title shall be permitted, altered, or denied in accordance with the standards and procedures of this chapter. In the case of a use existing prior to the effective date of the ordinance codified in this title as a conditional use, a change in the use, or reduction in lot area, or an alteration of the structure, shall require the prior issuance of a conditional use permit. In judging whether or not a conditional use permit shall be approved or denied, the Planning Commission shall weigh the proposal's positive and negative features that would result from authorizing the particular development at the location proposed and to approve such use, shall find

that the following criteria are either met, can be met by observance of conditions, or are not applicable.

A. The proposal will be consistent with the policies of the Comprehensive Plan and the requirements of this title and other applicable policies of the city;

Finding 14: As demonstrated in this Staff Report, the proposal is consistent with the Development Code to the extent feasible. Goal 1 of the Land Use Element of the Comprehensive Plan is “to guide the development and uses of land so they are orderly, efficient, aesthetically pleasing and suitabl[y] related to one another.” The CUMC has operated out of the building on the site for over 40 years and has shown it to be beneficial to the surrounding residential uses through, for example, the community garden, playground, and day care program. Church services are held on Sundays from approximately 10am to 2pm. The CUMC has seen declining attendance numbers over the years and have partnered with the CAC so that they will be able to remain in their longstanding location and continue serving the community. By utilizing the existing development, the CAC has avoided proposing a new construction project elsewhere in the city, which would have a greater impact on surrounding land uses. The CAC has provided their activity schedule, which includes classes and activities for seniors, and shows that there will be little overlap of CAC and CUMC activities and when there is overlap, the attendance numbers will still be well below the building capacity. The City of Canby does not have an institutional zone and does not have an abundance of vacant land where a new institutional use could be established. Therefore, requesting this conditional use in order to share existing facilities with a compatible and longstanding institution meets Land Use Element Goal 1.

Based on the above findings, the proposal is consistent with the Canby Comprehensive Plan and Development Code.

B. The characteristics of the site are suitable for the proposed use considering size, shape, design, location, topography, existence of improvements and natural features;

Finding 15: The site is currently developed with a building that includes community spaces, a kitchen and dining room, and classroom/office spaces that would serve a senior center well. There is also substantial green space on-site that can be enjoyed by the senior center attendees. The site is almost 3 acres, landscaped, flat, and has the required utility connections to serve the existing building. The parking lot has spaces in excess of what is required by the code.

Based on the above findings, the site is suitable for the proposed use.

C. All required public facilities and services exist to adequately meet the needs of the proposed development;

Finding 16: The proposal is for a new conditional use to be established in an existing development. The new use would utilize all existing infrastructure on site and does not propose activities that would require additional utility load. The traffic study shows that there is not a net increase of trips generated by the proposed use, as the existing trips that were assigned to the current location of the CAC will now be assigned to the new location.

Typically, physical public improvements can only be required by land use decision if substantial physical development is being constructed. Because this application is to establish a conditional use and not to physically redevelop the site, staff believe requiring installation of public sidewalk along Territorial and Holly along the property's perimeter is more than would be typically expected, and this is consistent with proportionality requirements based on the lack of significant traffic impacts. Staff and the applicant team are both aware that, under Section 16.50.040, the Planning Commission does have the authority to place conditions on a project that comes before them for decision, and "improving the street and/or expanding the right-of-way" is identified as one of the possible conditions the Planning Commission can impose in order to avoid detrimental impact and otherwise protect the best interests of the surrounding area.

D. The proposed use will not alter the character of the surrounding areas in a manner which substantially limits, or precludes the use of surrounding properties for the uses listed as permitted in the zone.

Finding 17: The site has long been developed and has proven to be compatible in design and character with the surrounding properties and uses. The activities of a senior center are community oriented, serving people and not conducting commercial business or fabrication of any product. This is very similar to the activities of the church, which has been utilizing the facilities and grounds for over 40 years. The use of this property as a senior center would not preclude any surrounding property from being developed for any of the other uses listed as permitted in the R-1 zone, which are primarily residential uses.

Given these factors, the proposed development will not alter the character of the surrounding area or preclude the use of the surrounding properties. Planning Staff finds the standard is met.

Section 16.50.040 *Placing conditions on a permit.*

In permitting a new conditional use or the alteration of an existing conditional use, the Planning Commission may impose conditions which it finds necessary to avoid a detrimental impact and to otherwise protect the best interests of the surrounding area or the community as a whole. These conditions may include the following:

- A. Limiting the manner in which the use is conducted, including restricting the time an activity may take place, and restraints to minimize such environmental effects as noise, vibration, air pollution, glare and odor;*
- B. Establishing a special yard, other open space or lot area or dimensions;*
- C. Limiting the height, size or location of a building or other structure;*
- D. Designating the size, number, location, and nature of vehicle access points;*
- E. Improving the street and/or expanding the rights-of-way;*
- F. Designating the size, location, screening, drainage, surfacing or other improvement of a parking area or truck loading area;*
- G. Limiting or otherwise designating the number, size, location, height and lighting signs;*
- H. Limiting the location and intensity of outdoor lighting and requiring its shielding;*

- I. Requiring diking, screening, landscaping or other facility to protect adjacent or nearby property and designating standards for its installation and maintenance;*
- J. Designating the size, height, location and materials for a fence;*
- K. Protecting and preserving existing trees, vegetation, water, resources, wildlife habitat or other significant natural or open space areas;*
- L. Limiting the number, location, and design of street accesses and requiring shared access when appropriate;*
- M. Other conditions to assure that the development complies with standards and criteria listed in section 16.50.010*

Finding 18: Staff and the applicant team both acknowledge that the Planning Commission does have the authority to place conditions on a project that comes before them for decision in order to avoid detrimental impact and otherwise protect the best interests of the surrounding area. However, Planning Staff assert that the categories of conditions listed above are generally not applicable to the proposed project due to its nature and scope, which is the adaptive reuse of an existing building that is already used for semi-public, community-oriented activities.

Chapter 16.89: Application and Review Procedures

This chapter describes the required procedures for the various application review procedure types. This application is subject to a Type III procedure.

Section 16.89.060 Type III procedure

Finding 19: The application has met the required of a Type III application, including a pre-application conference, neighborhood meeting, public notice, and the pending Planning Commission public hearing.

III. PUBLIC AND AGENCY COMMENTS

Notice of this application and the opportunity to provide comment was forwarded to property owners and residents within a 500-foot radius and also to the appropriate public agencies and departments.

A. Public Comments

As of February 27, 2025, no public comments have been received.

B. Partner Agencies, Departments, and Utility Providers Comments

Notice to the following agencies was sent on January 17, 2025, and a request for comment was made. No comments from these agencies have been received as of February 27, 2025. Staff notes these agencies had representatives attend the pre-application conference for this project and no concerns regarding provision of utility or public service were presented.

- **Canby Fire Department – Matt English**
- **Canby Utility Water – Lonnie Benham, Brian Hutchins, Veolia**
- **Canby Utility Electric – Josh Muravez**
- **DirectLink – Matt Downs**
- **Public Works – Spencer Polack**

IV. CONCLUSION

Staff have reviewed the applicant's project narrative and submitted application materials and finds that the application listed above conforms to the applicable review criteria and standards, subject to the conditions of approval noted in Section V of this Staff Report. Planning Staff recommend that the Planning Commission **Approve** Conditional Use Permit (CUP 24-02) subject to the identified conditions of approval below.

V. CONDITIONS OF APPROVAL

Prior to Occupancy:

1. Prior to occupancy, parking striping consistent to what is shown on the site plan shall be installed and inspected by City of Canby Planning Staff.
2. This land use approval is for the scope of use described in the application materials and in this staff report. The applicant shall notify the Planning Staff before establishing a new use. Any significant deviation of use will require additional land use review.