

August 4, 2026

Benton County Commissioners.

Our comments are in reference to LU-25-067 RR2 53.215B

I'm W. Shand Dill along with my family, we purchased our NW Terrace home six years past for it's unique location and Rural life style. This home was most likely to be our last home & neighborhood. We left the hectic daily life of a large population and found Shangri-La. However now faced along with our community, living within a thousand feet of an Event Center. A prominent member of Northside referred BUILDING as "24 hour access place we have never had". The potential 500-1000 people coming and going due to their sponsored events / activities.

Over a three day period, I knocked on Power Estates resident doors. Asking the question; are you in favor or opposed to the Northside Church project on NW Powers Ave? Overwhelming response! NO! NO!...way 95% of the residents responded NO! Clearly the residents are opposed to this campus.

Northside's draw of hundreds of Albany, Corvallis citizens to their services or functions, an upon the 260 parking spaces filled, the shoulders of NW Powers Ave will not accommodate major events. Parking on either side of the Rural roadway or any side streets. We all have the responsibility to maintain our roads. We all have witnessed, the parking methods on NW Oak Grove. The potential of emergency First Responders on a vary narrow roadway as is NW Powers, could be disastrous.

The proposed Campus of Northside is not in anyway a Rural sized build, along with all of the required supporting infrastructure. This project should be built in an area that is free of all of the natural issues, IE. wetlands, flooding, Wildlife. roadway that is too small for everyone's safety. As per the planning commission statement, the entire NW Powers ave required to be upgraded for everyones safety due to the increased traffic volume. Septic system is vulnerable to failure within two back to back functions, as stated per planning commission; May 5, 2026. If this campus project is approved, your actions will dramatically change the character of our community without a doubt forever with the loss of wildlife. the addition of Lights, noise, buildings, parking lot.

Commissioner's, you have the right to deny this application. Our attorney Sean Malone as well as many of members of our neighbor are very willing to prepare findings for this denial. You have plenty of supporting evidence for RR2 53.215B. Letters from the residents, Albany and Corvallis. Benton County tax payers. Please listen to your constituents.

We respectfully request, The Commission reject and Deny LU-25-067

Thank you...W. Shand Dill

My name is Pam Barrett, and I live at 3557 NW Terrace Drive Albany, OR 97321. My home was the first house built on Terrace Drive, and I have resided here at this address for 55 years. One might say I have a vested interest in what happens here in this neighborhood and its surrounding area. We raised our two children here in this wonderful rural residential country setting, enjoying the quiet serene beauty of the countryside, the surrounding farm fields as well as the beautiful barn on Powers property. I would stop many times to take photographs of it as the sun or even the snow displayed such a breathtaking, magnificent view. The dark nights allow us to view the stars, absent of excessive building lights. It also made the drive to and from work every day so peaceful. I still enjoy the view driving by the property on a daily basis, as do my neighbors. This country setting is why many of us chose to live and raise our families here. The children could always play, ride their bikes, etc. and we knew they were safe because we knew WHO our neighbors were. We have always had wonderful neighbors that help each other and support one another. Through the years, neighbors have changed, and new families have moved into this Rural Residential country location with small children and the same expectation to raise their children in a safe, calm and quiet rural environment. The area was not even on maps for so many years because we are COUNTRY, Rural Residential. We want to maintain the peaceful, serene country setting as it is now.

I am appalled that this establishment is even considering to ruin and disrupt so many families' lives and lifestyles with such an invasive massive campus disguised as a religious facility. To my knowledge, worship facilities do not consist of Gymnasiums, Amphitheaters, Pickle Ball Courts, Day care centers and all-night parties that would clearly disrupt the residents' lives.

I am further appalled that Benton County Commissioners would even, for a moment, think this is the right place for such a campus. There is plenty of commercial property available that is already zoned appropriately for such a facility. It is not uncommon to find walkers, dog walkers, bikers, joggers, runners, parents and grandparents with strollers along Powers Ave taking in the beauty of nature and wildlife this area offers. Any establishment of this sort would inhibit this experience and damage the opportunities for the children learning about the love of nature. The surrounding roads are not equipped or conducive for the abundant influx of vehicle traffic this establishment would bring to the area. The main road in question, Powers Ave., is a very narrow two-lane road with steep drop-offs into drainage ditches and hills that hinder your view of on-coming traffic. Making it very unsafe for all of those pedestrians. Powers Ave is used daily by the residents from neighborhoods on Terrace Drive, Oak Grove, Terra Lynda, Knollwood, Scenic, Palestine, Dumbeck Ave, including but not limited to the extended neighborhoods far beyond. This is just not the appropriate site for this campus.

You say you care about the neighbors - - "ACTIONS speak louder than words."

Please WITHDRAW!

RE: Appeal of the Planning Commission Denying Northside Christian Church Conditional Use Permit (CUP) application (File #LU-25-067)

Hello and thank you for the opportunity to speak today,

I am here to respectfully request that you deny the appeal and uphold the denial of the conditional use permit for the proposed Northside Christian Church at 4500 NW Powers Avenue in Albany.

First, I would like to address the basis of the appeal. The appeal argues that the original denial was not supported by "adequate findings." However, there were several significant concerns identified during the review process that the applicant has been unwilling to address. One of the most important issues is the condition of NW Powers Avenue and the need for roadway improvements.

NW Powers Avenue is best described as a rural country road. It has limited width, lacks adequate shoulders, and contains several areas with limited visibility. Residents who regularly use the road understand these constraints and typically drive cautiously, often moving into the opposite lane when safe to provide additional space for pedestrians, cyclists, dog walkers, and other recreational users. Because most drivers are local residents, they have a direct interest in maintaining the safety of the road.

The proposed church would substantially increase traffic, particularly on Sundays, with hundreds of vehicles traveling to and from services within a relatively short period of time. This increase in traffic would significantly reduce the ability of neighborhood residents to safely walk, run, bike, or recreate along NW Powers Avenue. Given the lack of shoulders and the presence of blind spots, the additional traffic would create legitimate safety concerns for those who live nearby.

Despite these concerns, Northside Christian Church has indicated that it is unwilling to fund the roadway improvements necessary to make the increased traffic safer for residents. As a result, the road would become less safe while the costs associated with mitigating those impacts could be shifted onto Benton County taxpayers.

This raises an additional concern. The applicant has suggested that the County should bear the cost of improving the roadway infrastructure needed to accommodate the church's development. Doing so would set a troubling precedent in which taxpayers are asked to subsidize transportation improvements primarily required by a private development. It would also create pressure for similar large-scale developments in rural residential zones, potentially undermining the purpose and character of those zoning districts.

The scale of the proposal is also unprecedented for this area. Northside Christian Church is proposing an 18,902-square-foot facility designed to accommodate up to 500 attendees, and that

figure reflects only regular worship services, not special events or other gatherings. To my knowledge, there are no churches of comparable size located within Benton County's RR-2 zones.

The closest comparison is St. Anne Orthodox Church, which is approximately 4,000 square feet, less than one-quarter the size of the proposed Northside facility. Even during St. Anne's annual Greek Food Festival, parking demands frequently exceed available on-site capacity, requiring the use of Mount View Elementary School and resulting in roadside parking that can effectively limit two-way traffic. It is difficult to believe that a church more than four times larger would require less parking or have fewer impacts on traffic, road safety, and neighborhood use of NW Powers Avenue. Furthermore, special events, conferences, holidays, and community gatherings would likely generate attendance beyond typical Sunday services, increasing parking and traffic demands even further. This is not speculation; it is a reasonable conclusion based on the church's own projected attendance.

I would also like to address the issue of rural character within the RR-2 zone. While "rural character" can be difficult to define and is often interpreted broadly, it is the residents who live in these communities who are best positioned to understand what contributes to that character and what threatens it.

My family has lived in this area for 20 years. We chose to make our home here because of its quiet rural setting and the opportunities it provided to raise our children in a natural environment. Over the years, the area has changed, but those changes have not fundamentally altered its rural character. We continue to see wildlife such as deer, bald eagles, rabbits, foxes, and coyotes on a regular basis. The roads remain places where people walk, run, bike, and enjoy the landscape. Residents generally drive carefully, understanding that they share these roads with neighbors and wildlife.

The revised proposal does not adequately address concerns about preserving that rural character. Weekly services would bring hundreds of vehicles into the area, along with additional traffic generated by special events, meetings, and other activities. These periods often coincide with the times when residents recreate outdoors and when wildlife is most active. The cumulative impact would be a significant and permanent change to the nature of the area.

Rural character is not simply a box to be checked. It is defined by the lived experiences of the people who call this area home. It reflects the sense of place, the pace of life, the quiet environment, and the relationship residents have with the surrounding landscape. Those are precisely the qualities that rural zoning regulations are intended to protect.

This proposal is not a rural-scale development. It is a large institutional project that would be more appropriately located in an urban area with transportation infrastructure capable of supporting its size and intensity. If approved, it would permanently alter the character of the area

in ways that many neighboring residents have consistently and repeatedly expressed concern about throughout this process.

For these reasons, I respectfully ask that you deny this appeal. Approval of the permit would erode the rural character of the community, create substantial traffic and safety concerns, place pressure on Benton County taxpayers to fund roadway improvements necessitated by the development, and undermine the purpose of rural residential zoning protections. I urge you to uphold the original decision and preserve the character and safety of this rural community.

Thank you for your time and consideration.

Erika and Ken Wolters
4859 NW Dumbeck Ave
Albany, OR 97321



GREENLIGHT
ENGINEERING

August 3, 2026

Benton County Board of County Commissioners
4500 SW Research Way
Corvallis, Oregon 97333

**RE: Appeal of Northside Christian Church Conditional Use Permit (File #LU-25-067)–
Transportation Impact Review**

Commissioners:

I have been retained by Cary Hoffer to review the transportation-related materials submitted in support of the Northside Christian Church Conditional Use Permit (LU-25-067) for the property located at 4500 Powers Avenue NW in Benton County, Oregon.

Based on my review, the transportation materials submitted by the applicant do not provide sufficient technical evidence demonstrating that the proposed Northside Christian Church development can be approved consistent with Benton County transportation standards.

Benton County Code (BCC) 53.215 requires that a conditional use not impose an undue burden on public improvements, facilities, utilities, or services available to the area. The current transportation record does not establish whether the proposed development satisfies this criterion because the applicant has not provided the operational, safety, and access analyses necessary to determine whether the existing transportation system can accommodate the proposed use. However, the available information indicates that the proposed development would generate traffic volumes exceeding the levels anticipated for a local road classification.

A central transportation issue is whether NW Powers Avenue, as currently classified and designed, is intended to accommodate the traffic generated by the proposed church. Based on the County's review, the proposed development would generate traffic volumes exceeding the adopted assumptions for the roadway classification of NW Powers Avenue, including both the roadway's daily traffic volume cap and Design Hour Volume (DHV) threshold.

The appropriate transportation resolution is not to approve the development subject to roadway improvements that would effectively upgrade NW Powers Avenue beyond its adopted classification. Based on the current transportation record, the proposed development should not be approved unless and until the necessary transportation improvements and roadway classification issues are addressed through the appropriate planning process. If the roadway requires a higher classification and associated improvements to serve the proposed development, those changes should occur through the Benton County Transportation System

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Plan (TSP) update process rather than through a condition of approval for a single development. Accordingly, denial of the application is appropriate based on the applicant's failure to demonstrate that the proposed use can be accommodated consistent within the existing adopted TSP.

Executive Summary

The primary findings of this review are summarized below:

- The proposed development requires transportation improvements beyond the adopted function of NW Powers Avenue. NW Powers Avenue is classified as a local road under the Benton County TSP, with an adopted roadway cross section consisting of two 10-foot travel lanes and two-foot shoulders. The County has identified that accommodating the proposed church traffic would require a wider roadway section consisting of 24 feet of paved width and two-foot shoulders. A 24-foot paved roadway section is more consistent with a higher-function roadway, such as a minor collector, rather than the existing local road classification. If a higher roadway classification is needed, that change should occur through the TSP planning process rather than through a condition of approval for a single development.
- The appropriate transportation solution is denial of the application rather than conditioning approval on roadway improvements that have not been demonstrated to be feasible or consistent with the adopted transportation system. The applicant has argued that required off-site roadway improvements are not roughly proportional to the impacts of the proposed development. In addition, both the applicant and Benton County have questioned whether the identified improvements are feasible. The County should not approve a development based on a condition requiring improvements that would effectively implement a roadway upgrade beyond the adopted transportation plan.
- The proposed church exceeds the adopted transportation assumptions for NW Powers Avenue. In the June 17, 2026 Public Works memorandum, Benton County concluded that the daily volume cap of 700 vehicles per day would be exceeded, with projected traffic volumes reaching approximately 990 vehicles per day on the east end of NW Powers Avenue. This finding demonstrates that the proposed development would generate traffic volumes beyond the level anticipated for the roadway based on its adopted functional classification.
- The record contains potentially inconsistent information regarding the size of the proposed building. The applicant's traffic engineer based trip generation on 18,902 square feet gross floor area, but there are comments in the record that suggest the size of the building is much larger. Because trip generation forms the basis for evaluating transportation impacts, roadway adequacy, and parking requirements, the applicant should update the Traffic Impact Study to resolve this discrepancy and clearly identify the appropriate trip generation assumptions.
- The proposed church traffic alone exceeds the roadway's Design Hour Volume (DHV) threshold. Based on the trip generation estimates prepared by DKS Associates, the proposed church is expected to generate approximately 270 Sunday peak hour vehicle

trips. This exceeds the 100 vehicles/hour DHV threshold associated with the local road classification of NW Powers Avenue.

- Benton County Code (BCC) 53.215 requires that the proposed use not impose an undue burden on public improvements, facilities, utilities, or services available to the area. The current transportation record does not demonstrate that this criterion has been satisfied.
- The applicant concludes that NW Powers Avenue will continue to operate within its functional capacity and that no operational or safety issues will result. The record does not include the engineering analyses typically relied upon to support those conclusions and determine that the proposed development will not place an undue burden on the transportation system, including:
 - intersection operational analysis;
 - queue analysis;
 - left-turn lane analysis;
 - crash analysis; or
 - a comprehensive safety evaluation.
- The applicant does not demonstrate compliance with Benton County access management standards. The proposed main driveway would be located within the required access spacing distance of an existing residential access point on the north side of NW Powers Avenue. This issue has not previously been addressed.
- The applicant does not evaluate potential safety issues at the NW Powers Avenue/NW Oak Grove Drive intersection despite possible sight distance constraints. Because this intersection is expected to serve a substantial portion of church-related traffic, adequate intersection sight distance should be verified.
- The applicant does not evaluate whether a left-turn lane or other operational improvements may be warranted at Scenic Ridge Drive/NW Powers Avenue. A substantial portion of church traffic is expected to use this route, yet the applicant provides no analysis of potential turning conflicts, delay, queuing, or operational impacts.

Roadway Functional Classification, Transportation System Plan Consistency, and Appropriate Resolution

A central transportation issue associated with the proposed Northside Christian Church development is whether NW Powers Avenue, as currently classified and designed, is appropriate to serve the traffic generated by the proposed use.

The Benton County TSP establishes roadway classifications and associated design expectations based on the intended function of each facility. These classifications are intended to guide both transportation investment decisions and land use decisions. A roadway classification should not be modified on a project-by-project basis solely to accommodate a single development that generates traffic beyond the assumptions established for the roadway.

The available record indicates that the proposed church exceeds the transportation assumptions established for NW Powers Avenue.

The County's own review has identified that the proposed development exceeds the applicable daily traffic threshold for NW Powers Avenue. In the June 17, 2026 Public Works memorandum, Benton County concluded that the daily volume cap of 700 vehicles per day would be exceeded, with projected traffic volumes reaching approximately 990 vehicles per day on the east end of NW Powers Avenue.

This finding is significant because the daily volume cap represents the level of traffic anticipated for the roadway based on its existing classification and intended function. A development that causes the roadway to exceed this threshold requires evaluation of whether the proposed use is consistent with the planned transportation system.

The proposed church also exceeds the roadway's DHV threshold per Benton County's analysis. Based on the trip generation estimates prepared by DKS Associates, the proposed church is expected to generate approximately 270 vehicle trips during the Sunday peak hour alone. This exceeds the 100 vehicles/hour DHV threshold associated with the local road classification of NW Powers Avenue.

The applicant's traffic engineer contends that "The Design Hourly Volumes (DHV) are typically the peak volume of the day and generally occur during the commuter time periods." The Oregon Department of Transportation's Analysis Procedures Manual identifies DHV as the 30th highest hourly traffic volume occurring during the entire year.

The proposed church represents a unique land use because its traffic generation is highly concentrated and occurs on a recurring weekly basis.

The applicant acknowledges this concentrated traffic pattern, stating:

"The church anticipates two Sunday morning services, currently scheduled for 8:30 a.m. and 10:15 a.m., with Sunday traffic generally spread between approximately 7:00 a.m. and 11:40 a.m....and occasional weddings or memorials limited to the capacity of the building."

This statement demonstrates that the proposed use will generate recurring peak periods throughout the year. With two Sunday services each week, the church is expected to create multiple Sunday morning periods annually when traffic volumes exceed typical conditions on NW Powers Avenue. Additional events identified in written comments, including weddings and memorial services and other events, will further contribute to concentrated traffic conditions.

Because the proposed church will generate recurring high-volume periods throughout the year, Sunday morning church traffic would reasonably be expected to represent the controlling DHV condition for NW Powers Avenue.

The significance of these traffic impacts is that roadway adequacy is not evaluated solely by the number of vehicles traveling on a roadway over an entire day. A roadway must also function during the periods when traffic demand is greatest. Church traffic is inherently concentrated, with a substantial number of vehicles arriving within a relatively short period before services and departing within a relatively short period afterward. These conditions are materially different from average weekday traffic patterns and are the conditions most relevant when evaluating whether the roadway can safely and adequately serve the proposed use.

The Benton County TSP identifies both average daily traffic and Design Hour Volume as important considerations when evaluating roadway function. The proposed development exceeds both measures.

The appropriate solution to these impacts is not to widen NW Powers Avenue through a condition of approval for this development. The purpose of the Benton County TSP is to establish roadway classifications and associated design standards based on the intended function of each facility. Those classifications guide land use decisions and transportation investments; they are not intended to be modified on a project-by-project basis solely to accommodate a single development that exceeds the planned capacity or function of the roadway.

NW Powers Avenue is currently classified as a local road. The County's adopted local road cross section consists of two 10-foot travel lanes and two-foot shoulders. This roadway standard reflects the intended function of a local road, including serving local access needs and accommodating traffic volumes consistent with that classification.

However, the County has identified that accommodating the traffic generated by the proposed church would require a wider roadway section consisting of 24 feet of paved width and two-foot shoulders. A 24-foot paved roadway width is more consistent with a higher-function roadway, such as a minor collector, rather than the existing local road classification.

If the traffic generated by the proposed development requires a roadway cross section beyond the standard applicable to a local road, the issue is not simply whether the roadway can physically be widened. The issue is whether NW Powers Avenue should be reclassified through the County's transportation planning process.

A change from a local road to a minor collector would occur through an update to the Benton County TSP supported by a broader evaluation of transportation needs, connectivity, funding, system impacts, and consistency with County transportation objectives. Such a change should not occur indirectly through a single conditional use permit approval.

The applicant has argued that required off-site roadway improvements are not roughly proportional to the impacts of the proposed development. At the same time, both the applicant and Benton County have questioned whether the identified improvements are feasible. These issues create a fundamental concern with relying on roadway widening as the solution to address the transportation impacts of the proposed use. The County should not approve an application

based on a condition of approval requiring improvements that have not been demonstrated to be feasible.

A condition of approval should address impacts created by a development within the context of the adopted transportation system. It should not be used to implement a roadway upgrade beyond the adopted classification of the facility. If the County determines that NW Powers Avenue should function as a higher classification roadway, that decision should be made through the appropriate TSP planning process before approving development that depends on that upgraded transportation system.

Therefore, based on the available record, the appropriate transportation resolution is not to condition approval on widening NW Powers Avenue. The proposed development exceeds the roadway's adopted functional assumptions, and the necessary transportation changes should occur through the County's transportation planning process. Until that process occurs, the proposed use is not consistent with the existing transportation system and the definition of the road classification. As a result, the application should be denied on this basis and not conditioned for improvements that may not be feasible and are not consistent with the TSP.

Applicant's Traffic Analysis Does Not Demonstrate That the Transportation Network Can Adequately Accommodate the Proposed Use

The applicant's transportation analysis largely consists of trip generation estimates and comparisons of average daily traffic volumes. While these are important components of transportation review, they do not by themselves demonstrate that a roadway or intersection will operate safely or adequately, particularly for a land use that generates concentrated traffic during short periods of time. This is very unique given the significance of the development proposed and despite Benton County's requirement that "The proposed use does not impose an undue burden on any public improvements, facilities, utilities, or services available to the area."

The applicant concludes that NW Powers Avenue will continue to operate within its functional capacity and that the proposed development will not create operational or safety concerns. However, the applicant provides little supporting analysis for these conclusions.

The traffic analysis does not include several evaluations typically relied upon to demonstrate that a proposed development can be adequately accommodated, including:

- intersection level of service or volume-to-capacity analysis;
- queue analysis;
- access spacing analysis;
- safety analysis of existing and future conditions; and
- left-turn evaluation.

These omissions are also significant because ORS 215.441(2)(b) expressly authorizes a county to deny an application for a place of worship if it finds that "the level of service of public facilities,

including transportation, water supply, sewer and storm drain systems is not adequate to serve the place of worship." The applicant has not provided any roadway or intersection level of service analysis, nor any operational analysis demonstrating the level of service at affected intersections. Without these analyses, the record does not demonstrate that the transportation system provides an adequate level of service for the proposed development.

These analyses are particularly important for this application because the proposed church will generate concentrated traffic during recurring Sunday arrival and departure periods. Evaluating average daily traffic alone does not demonstrate whether the transportation system can safely accommodate short-duration traffic surges associated with scheduled church services.

Despite the absence of these analyses, the applicant's transportation consultant reaches several conclusions regarding roadway operation, safety and the need for mitigation. The applicant states:

- "Traffic will disperse efficiently within the existing roadway network." However, there is not substantial evidence supporting this conclusion. The applicant does not provide an operational analysis demonstrating how traffic will disperse during the concentrated Sunday arrival and departure periods associated with church services.
- "The proposed development does not introduce a level of pedestrian or bicycle activity requiring dedicated facilities, a continuous widened shoulder is not warranted." However, there is not substantial evidence supporting this conclusion.
- "The projected traffic volumes do not result in sustained congestion, unsafe queuing conditions, or degradation of roadway operations." However, there is not substantial evidence supporting this conclusion. The applicant does not provide intersection operational analysis, or queue analysis demonstrating that the proposed church traffic can be accommodated without operational impacts.
- "No capacity, operational, or safety deficiency has been identified that would warrant roadway improvements associated with this development." However, this conclusion is not supported by the analyses necessary to identify whether such deficiencies exist or not.
- "Based on the projected volumes and roadway characteristics, extended queuing is not expected." However, there is not substantial evidence supporting this conclusion. The applicant does not provide any queuing analysis.
- "At low traffic volumes, vehicles departing the site will disperse quickly along the roadway network. While brief delays may occur during peak departure periods, these conditions are temporary and do not result in sustained congestion." However, there is not substantial evidence supporting this conclusion. This statement acknowledges that concentrated departure periods will occur but does not evaluate whether those conditions would exist or not.
- "While higher speeds increase gap requirements, traffic volumes on these facilities remain low. These low volumes result in sufficient gaps for vehicles entering and exiting onto these roadways. The addition of site-generated traffic will not materially affect gap availability or create unsafe turning conditions." However, there is not substantial

evidence supporting this conclusion. The applicant does not provide a gap analysis, offsite intersection sight distance evaluation, or operational analysis.

- “There is no evidence of a documented crash pattern or safety deficiency along the roadway that would warrant reconstruction or capacity improvements. The proposed development does not introduce traffic volumes or operational characteristics associated with increased crash risk, such as high traffic volumes, continuous turning conflicts, or substantial increases in pedestrian activity.” However, there is not substantial evidence supporting this conclusion. The applicant provides no crash history or analysis of crashes.

Benton County Mobility Standards Not Addressed

The Benton County TSP identifies mobility standards that are required to be considered when evaluating transportation impacts associated with development.

The TSP states:

“Prior to this TSP update, Benton County had no mobility standards for County facilities. These tools provide a metric for assessing the impacts of new development on the existing transportation system and for identifying where capacity improvements may be needed to sustain the transportation system as growth and development occur...All roadways and intersections owned by Benton County must operate at or below the following mobility targets.”

The TSP adopted the following standard:

“**Two-way Stop and Yield Controlled Intersections:** All intersection approaches serving more than 20 vehicles during the highest one-hour period on an average weekday (typically, but not always the evening peak period between 4 p.m. and 6 p.m. during the spring or fall) shall operate with a v/c ratio not higher than 0.90. Mobility targets do not apply to approaches at intersections serving 20 vehicles or fewer during the peak hour.”

For a significant development, the applicant’s TIA is very unique in that it does not provide evidence demonstrating that the applicable Benton County mobility standards are met at affected intersections. Specifically, the applicant does not provide intersection operational analysis or volume-to-capacity calculations demonstrating that affected intersections will operate within the adopted mobility targets.

Despite this lack of analysis, the applicant concludes that the proposed development will not create congestion or operational deficiencies.

The applicant’s conclusions regarding transportation adequacy are therefore unsupported by substantial technical evidence. The transportation record does not demonstrate that NW Powers Avenue and the surrounding roadway network can adequately accommodate the proposed use consistent with Benton County’s adopted transportation standards and a requirement that “The

proposed use does not impose an undue burden on any public improvements, facilities, utilities, or services available to the area.”

Trip Generation Methodology and Concentrated Church Traffic

The applicant’s trip generation methodology has changed throughout the review process. This issue is significant because the trip generation estimate forms the foundation for evaluating the transportation impacts of the proposed development.

Initially, Sandow Engineering prepared an independent local trip generation study using selected comparison churches to estimate the anticipated traffic impacts of the proposed development. Benton County reviewed that analysis and determined that the selected comparison sites were not sufficiently comparable to provide a reliable basis for estimating the traffic generated by the proposed church.

As a result, Benton County retained DKS Associates to independently evaluate trip generation for the proposed development. Following that review, Sandow appears to have abandoned its original local trip generation study and instead relied on the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, Land Use Code 560 (Church).

However, unlike DKS Associates, which estimated trip generation using the proposed seating capacity, the applicant’s analysis relies on the building’s gross floor area as the independent variable.

The current record also contains a possible inconsistency regarding the building size used in the applicant's trip generation calculations and the building plans. The applicant's traffic analysis relies on a smaller gross floor area of 18,902 square feet of gross floor area, while comments in the record indicate that the building size may be much larger. Because the applicant selected gross floor area as the basis for estimating trip generation, this discrepancy could materially affect the estimated number of trips generated by the development and the resulting conclusions regarding transportation impacts. In contrast, both DKS Associates and Benton County based their trip generation estimates on the proposed seating capacity, meaning their estimates may not be affected by the revised building area. At a minimum, the discrepancy should be resolved through an updated traffic impact analysis that clearly identifies the correct building area, trip generation methodology, and resulting transportation impacts. The revised building area may also affect the minimum parking requirement applicable to the development.

ITE provides trip generation relationships for churches using multiple independent variables, including seating capacity and gross floor area. The selected independent variable should represent the characteristics of the proposed use that most directly influence traffic generation.

For a church use, seating capacity is a particularly relevant variable because traffic generation is primarily associated with the number of attendees arriving and departing during scheduled services. The number of available seats directly reflects the maximum number of attendees the

facility is designed to accommodate during worship services and therefore provides a direct relationship to the number of vehicle trips generated during concentrated church events.

The applicant's transportation materials do not appear to provide a technical justification explaining why gross floor area was selected over seating capacity, particularly after Benton County's independent consultant estimated trip generation using the proposed seating capacity. Without such justification, the applicant has not demonstrated that the selected methodology provides the most representative estimate of traffic generated by the proposed church.

This issue is important because the trip generation estimate affects all subsequent transportation conclusions, including the evaluation of roadway adequacy, operational impacts, safety conditions, and the need for mitigation. The accuracy of the trip generation estimate is therefore critical to determining whether the proposed use can be appropriately evaluated under the County's transportation standards.

Driveway Spacing Requirement Not Met

The Benton County TSP identifies access management as an important component of maintaining safe and efficient transportation operations. Proper driveway spacing reduces conflicts between vehicles entering and exiting properties, improves sight distance, and helps maintain the intended function of County roadways.

The TSP states:

"The spacing of street and driveway and intersections on a roadway is a key element of access management... Minimum public roadway intersection and private access spacing standards for County-owned roadways outside of an UGB are identified in Table 8 below. New roadways or redeveloping properties must comply with these standards to the extent practical, as determined by County staff."

Table 8 of the TSP establishes a minimum access spacing standard of 100 feet for private accesses on applicable County roadways.

The applicant's transportation materials do not evaluate whether the proposed main driveway complies with this access spacing standard. However, based on the submitted site plan, the proposed driveway appears to be located within the required spacing distance of an existing residential access point on the north side of NW Powers Avenue.

As shown on the site plan, the distance between the proposed church driveway and the existing residential driveway is approximately 30 feet when measured from edge to edge. When measured from driveway centerline to driveway centerline, the separation is approximately 65 feet. Both measurements are less than the 100 foot minimum access spacing standard identified in the Benton County TSP.

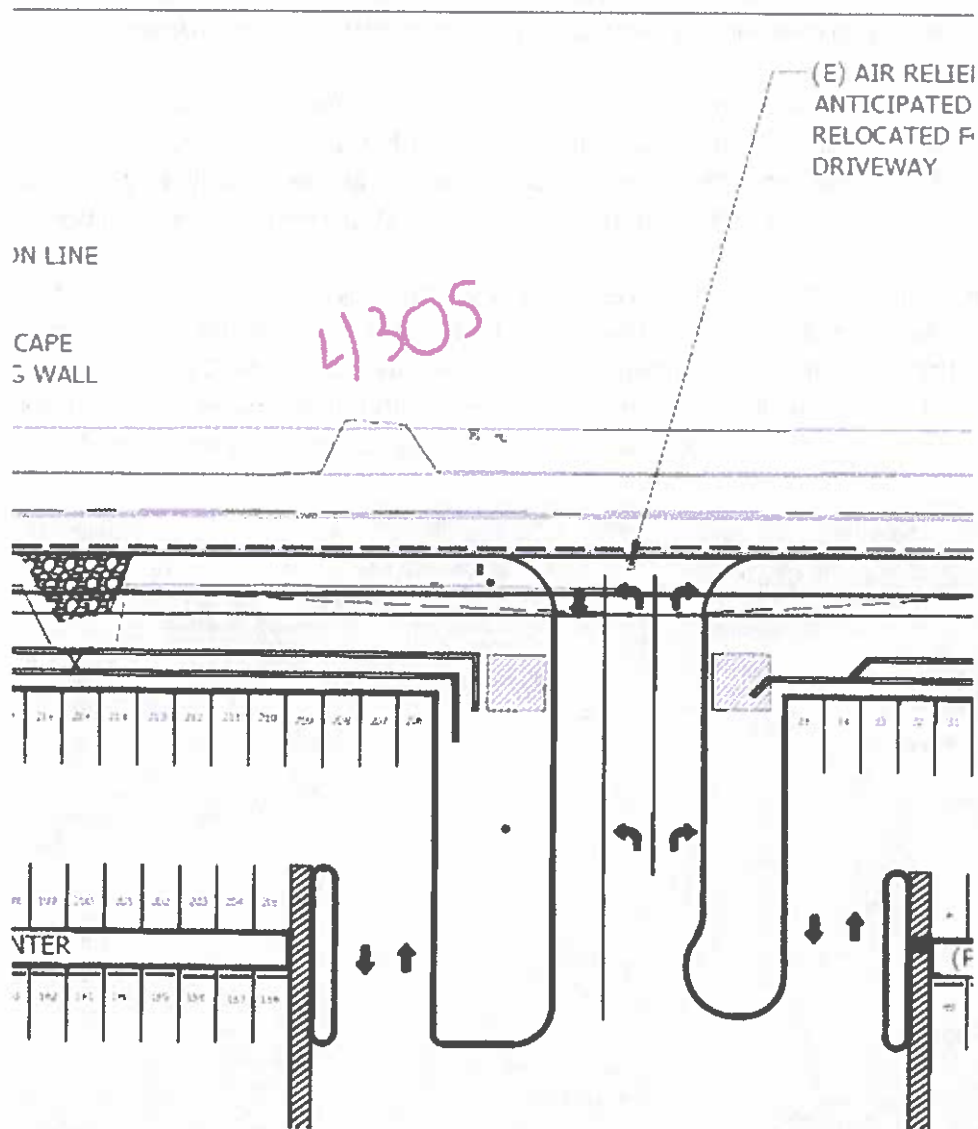


Figure 1: Excerpt of Site Plan Illustrating Distance between Main Driveway and 4305 NW Powers Avenue

The applicant has not provided an access management analysis demonstrating that the proposed driveway location satisfies the TSP standard or explaining why the standard cannot be met. The applicant also does not evaluate the operational and safety implications of placing two closely spaced driveways opposite each other, including potential conflicts between vehicles entering and exiting the church and vehicles accessing the existing residential property.

Powers Avenue/Oak Grove Drive Intersection Safety

The applicant's transportation analysis does not evaluate the safety characteristics of the NW Powers Avenue/NW Oak Grove Drive intersection, despite the likelihood that this intersection will serve as a primary route for a substantial portion of church-related traffic.

Based on a preliminary review (without a field investigation), the intersection may have potential sight distance constraints associated with the vertical curvature of NW Oak Grove Drive.

NW Oak Grove Drive does not have a posted speed limit. Under Oregon's basic rule, a roadway without a posted speed limit may operate at speeds up to 55 mph. Using a conservative design approach, an assumed 55 mph operating speed would require approximately 610 feet of intersection sight distance consistent with AASHTO guidance for a stop-controlled intersection.

A preliminary review indicates that the required sight distance may not be available at this location due to the vertical curvature of NW Oak Grove Drive. This issue should be confirmed through a field evaluation and appropriate engineering analysis. Given that NW Oak Grove Drive is expected to serve as a primary route for church traffic, verification of adequate sight distance is an important component of demonstrating that the proposed use can be safely accommodated.

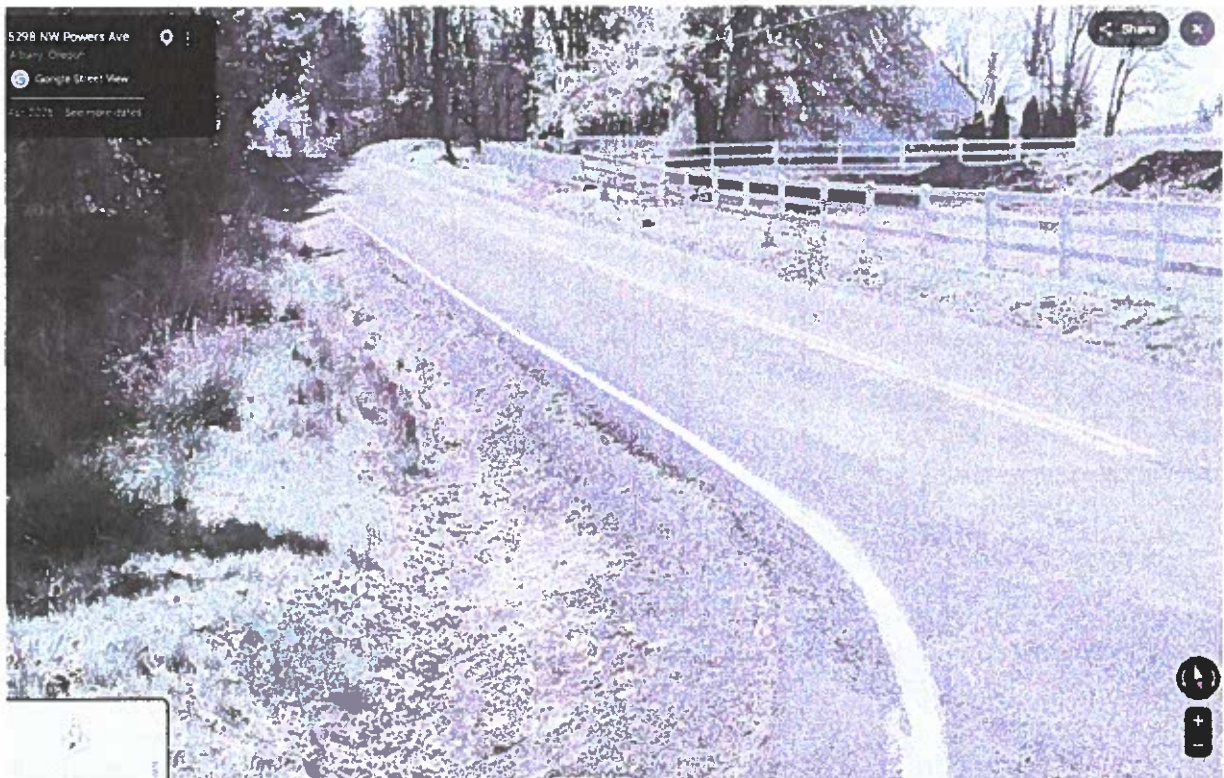


Figure 2: Google Street View Image of the NW Powers Avenue/NW Oak Grove Drive Intersection Looking South. The Background Illustrates the Vertical Curve on NW Oak Grove Drive That May Affect Available Intersection Sight Distance

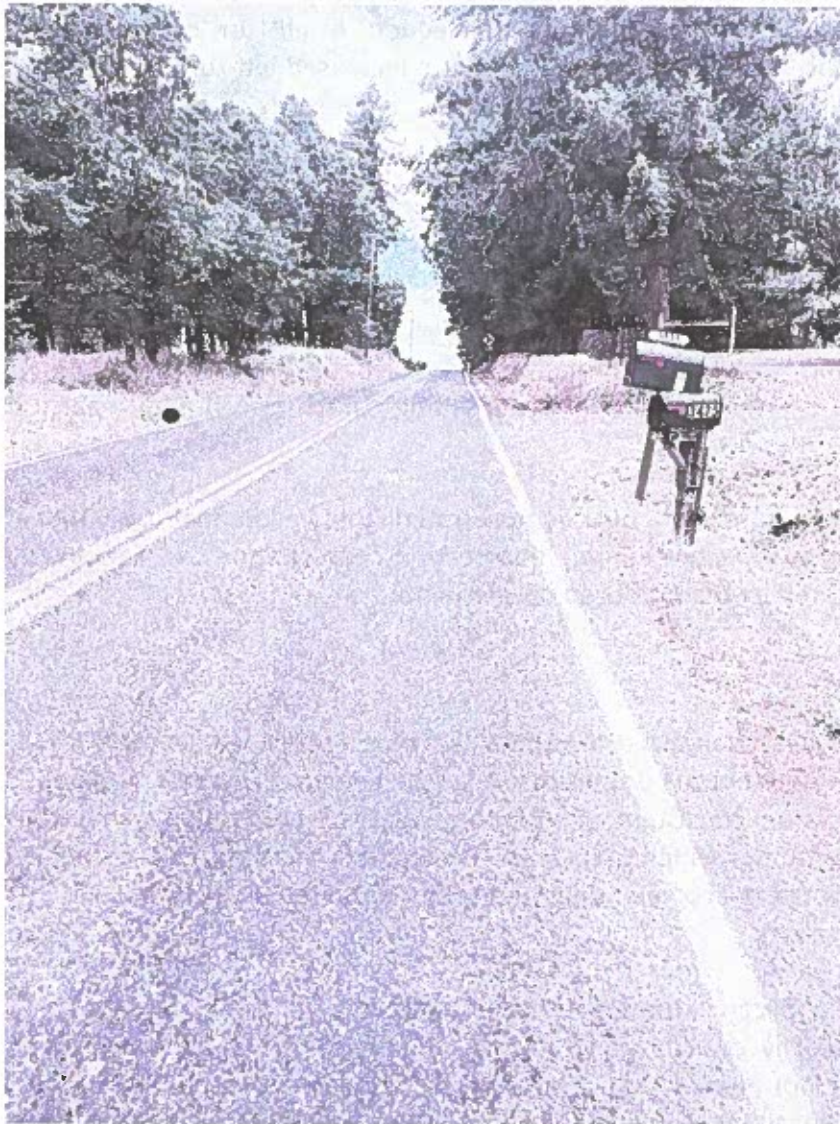


Figure 3: View from NW Oak Grove Drive Approximately 600 feet South of NW Powers Avenue. NW Powers Avenue is Not Visible.

Scenic Ridge/Powers Avenue Left-Turn Evaluation

The applicant did not evaluate whether operational improvements may be warranted at the NW Scenic Ridge Drive/NW Powers Avenue intersection, despite the expectation that a substantial portion of church-related traffic will travel through this intersection.

Based on the applicant's assumed trip distribution, NW Scenic Ridge Drive is expected to serve as a primary access route for vehicles traveling to and from the proposed church. Because church traffic will be concentrated during scheduled arrival and departure periods, the operational effects of turning movements at this intersection should be evaluated based on the peak conditions created by the proposed use, rather than average daily traffic conditions.

The applicant does not provide an evaluation of whether a northbound left-turn lane or other operational improvements may be warranted at the intersection. A left-turn evaluation is a standard component of transportation impact analysis because increased left-turn demand can create conflicts between turning vehicles and through traffic, increase delay, and create the potential for vehicle queues.

The applicant's analysis does not include:

- an evaluation of projected left-turn volumes;
- an assessment of left-turn lane warrants or need;
- a queue analysis for vehicles waiting to turn; or
- an operational analysis of intersection conditions during church arrival and departure periods.

Without this analysis, the applicant has not demonstrated that additional operational improvements are unnecessary or that the existing intersection configuration can adequately accommodate the traffic generated by the proposed development.

Conclusion

Based on my review of the transportation materials submitted for the proposed development, the applicant has not demonstrated that the proposed use can be adequately accommodated by the existing transportation system consistent with Benton County transportation standards. The transportation analysis does not provide the technical evaluations necessary to determine that the existing roadway network can accommodate the traffic generated by the proposed church without additional mitigation.

The primary deficiencies in the applicant's transportation analysis are:

1. The applicant relies heavily on trip generation estimates and average daily traffic comparisons but does not provide the operational analyses necessary to support conclusions regarding capacity, delay, queuing, intersection performance, roadway level of service, or the ability of the transportation system to accommodate concentrated church traffic conditions. The Benton County TSP identifies intersection operational analysis and mobility evaluation as necessary components of evaluating transportation impacts, yet the applicant provides no intersection operational analyses or volume-to-capacity calculations demonstrating compliance with the County's adopted mobility standards. Likewise, the applicant has not demonstrated that the transportation system provides an adequate level of service as contemplated by ORS 215.441(2)(b).
2. The applicant does not demonstrate compliance with Benton County TSP access spacing standards for the proposed driveway configuration.
3. The applicant does not adequately evaluate safety conditions at the NW Powers Avenue/NW Oak Grove Drive intersection, including potential sight distance limitations associated with the existing roadway geometry.

4. The applicant does not evaluate whether operational improvements may be warranted at the NW Scenic Ridge Drive/NW Powers Avenue intersection to accommodate concentrated turning movements associated with church traffic.

Benton County Code (BCC) 53.215 requires that the proposed use not impose an undue burden on public improvements, facilities, utilities, or services available to the area. In addition, ORS 215.441(2)(b) authorizes the County to deny a place of worship if the level of service of public facilities, including transportation facilities, is not adequate to serve the proposed use. Because the applicant has not performed roadway or intersection level of service analyses or other operational analyses demonstrating transportation adequacy, the current record does not provide substantial evidence that either standard has been satisfied.

The transportation impacts associated with the proposed development require improvements beyond the existing function and adopted design assumptions of NW Powers Avenue. However, the roadway improvements necessary to serve the proposed development cannot simply be imposed as conditions of approval because they would effectively upgrade NW Powers Avenue beyond its adopted local road classification and exceed the transportation function and volume thresholds established for that facility. Such changes should occur through the Benton County TSP planning process rather than through approval of an individual development.

Therefore, based on the current record, the proposed development should be denied because the applicant has not demonstrated that the existing transportation system can accommodate the proposed use, and the roadway improvements necessary to serve the development are not consistent with the adopted classification and intended function of NW Powers Avenue.

Sincerely,

Rick Nys, P.E.
Principal Traffic Engineer



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August 3, 2025

Via Email

Benton County Board of Commissioners
c/o Bob Richardson,
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Re: Testimony on behalf of Cary Hoffer Testimony before the Board of Commissioners on Appeal of a Denial of a Conditional Use Application for a Church, Daycare Center, Gymnasium, Offices, Storage Area, Playground, *etc.* in the RR Zone (File # LU-25-067, Northside Christian Church)

Dear Board of Commissioners,

Please accept this testimony on behalf of Cary Hoffer in support of the Planning Commission's denial and in opposition to the application (File # LU-25-067, Northside Christian Church). I respectfully request that the Board of Commissioners affirm the Planning Commission's denial¹ for the reasons set forth below, in the testimony of affected constituents, and the Greenlight Engineering Report. I am available to prepare or assist County staff in preparing findings in support of a denial of the application.

¹ During their deliberation, the Planning Commission commented that the proposed development would introduce an institutional use with a building footprint, parking area, and level of activity that differs from the current surrounding pattern of residential and agricultural development, and discussed whether this introduction would be compatible with the established character of the surrounding rural residential neighborhood. In addition, they spoke to the burden of the proposal on Powers Road from the influx of traffic and other issues.

The Applicant Submitted Inconsistent Factual Information in Support of the Requested Uses

The applicant has submitted inconsistent factual information in support of its revised application. Inconsistent factual information fundamentally undermines the analysis performed by staff and frustrates review by opponents and the Board of Commissioners. The Board of Commissioners should not accept these glaring contradictions in basic factual information from an applicant, and the Board of Commissioners is well within its authority to deny the application based upon the inconsistent factual information because it undermines satisfaction of the applicable criteria.

Significant discrepancy in square footage

The applicant alleged to have scaled back its proposal from an 18,902 square foot gymnasium/temporary sanctuary/ multi-use facility (phase 1) and approximately 54,000 square foot sanctuary (phase 2) (as well as daycare center, amphitheater, pickleball courts, recreational fields, *etc.*) to just the alleged 18,902 square foot church/gymnasium/daycare center/offices/playground and roughly 2,000 square foot storage building.² The applicant has repeatedly emphasized this reduction and its alleged oversized parking lot to accommodate for overflow parking. The problem, however, is that the plans submitted and relied upon by the applicant show that the square footage will exceed the alleged 18,902 square feet by as much as approximately 10,000 square feet.³ That is a significant change in the building's size and capacity that, in and of itself, should require a revision in the application, resulting in an approximately 28,536 square foot multi-use building, including a sanctuary/gymnasium/day care center/offices/flex rooms/*etc.*

One may simply add up the square footage of each room in the applicant's submitted plans, though even those plans omit the square footage for certain rooms. Doing so leads to a figure well in excess of the alleged square footage. One may also use the applicable Benton County Code and Oregon Structural Specialty Code provisions. *See* BCC 11.155 (adopting the Oregon Structural Specialty Code); Oregon Structural Specialty Code (2025 ed), Chapter 2, § 202 ("FLOOR AREA, GROSS. The floor area within the inside perimeter of the exterior walls of the building under consideration,

² A gymnasium is not an activity that is "customarily associated with the practices of the religious activity." ORS 215.441(1).

³ The reason for these inconsistent figures is not known, but it is certain that they are inconsistent.

exclusive of vent shafts and courts, without deduction for corridors, stairways, ramps, closets, the thickness of interior walls, columns or other features. The floor area of a building, or portion thereof, not provided with surrounding exterior walls shall be the usable area under the horizontal projection of the roof or floor above."). See Josanna Biddle-Croco and Andrew Biddle submission, dated July 23, 2026: "Using the definitions in the code, the gross floor area includes the first floor (110'-3" by 171'-7" = 18,917 square feet) and the second floor (110'-3" by 87'-3" = 9,619 square feet). $18,917 + 9,619 = 28,536$ square feet gross floor area." Regardless of what method is used, the conclusion is the same: the applicant has not been candid with the public or the Board of Commissioners, and the Board of Commissioner should reject an application that has repeatedly miscalculated basic figures that are central to the application.

Aside from getting a basic understanding of the proposal's size and scope, the problem with dramatically underestimating the square footage is that it undermines compliance with the approval criteria. See BCC 91.605(5) ("A place of public assembly including church, stadium, arena, club, lodge, auditorium, meeting room, and undertaking establishment shall provide 1 space for each 100 square feet of gross floor area or 1 space for each 8 seats, whichever is greater."). As it stands now, the applicant is out of compliance with BCC 91.605 now that the inconsistent figures have been identified. Instead of lauding itself for providing extra parking (for what will be major events that cause overflow parking), the applicant has actually undersized its parking lot, contrary to the Benton County Code. In addition, the underestimating the square footage can underestimate the number and frequency of daily automobile trips to and from the site, an important issue for the public and neighbors. See BCC 53.215(2); ORS 215.441(2)(b).

Significant discrepancy in the number of "attendees"

In addition to the square footage inconsistencies, the applicant's site plans demonstrate that the multi-use building has a much greater capacity than the applicant is presenting (which is 500 seats⁴) to the Commissioners. This makes sense when understanding that the multi-use building has a far greater square footage than has been disclosed. When accounting for the capacity identified in the applicant's site plans and architectural renderings, the number of attendees for the church and its many rooms and uses is far greater than what has been proposed. First, adding up the seating and capacity that is disclosed (and many rooms do not disclose a capacity), the result is 829, which is

⁴ Again, the applicant has not been clear. While at times the applicant alleges 500 seats, the figure in the initial architectural drawings lists 478 seats. See Staff Attachment at K.61.

far greater than the 500 presented to the Board of Commissioners. *See* Staff's Attachment K.61-62. However, the most recent architectural renderings at Staff's Attachment B.122-123 rarely disclose capacity, which further obfuscates the Board of Commissioner's review of the application. Second, accounting for the number of toilets proposed for the structure, the building can accommodate 1,300-2,250 persons and likely more.⁵ Third, just looking at the day care center's capacity, the number is far greater than what has been disclosed. The applicant alleges that the maximum number of enrollees at the daycare center is 35, yet the capacity is for, at least, 81 persons.⁶ *See* Staff Attachment K.61. If the applicant wants a 500-person building or a day care center for 35 enrollees, then the applicant should do so, instead of an oversized building that will undercount attendees and traffic impacts, which results in inadequate levels of service, undue burdens on the facilities, inadequate septic system capacity, and impacts to neighbors. *See* BCC 53.215(2); ORS 215.441(2)(b).

As with the case above, some figures related to traffic counts can be estimated based upon the square footage of the church or the number of seats or capacity of the church. However, this is no ordinary church because it includes a day care center, flex spaces, offices, a playground, a gymnasium, and so forth. There is more to this proposal than a modest church. The DKS traffic report based its traffic count on 500 people, but the reality is closer to 829 people (or even thousands of people based on how many people can be accommodated by the number of toilets), not counting the many rooms that were unaccounted for in terms of capacity. Again, the applicant has not set forth realistic estimates for this project when compared to the site plans and architectural renderings that the applicant is relying upon.

⁵ Depending on how the space is used under the Oregon Structural Specialty Code, 30 toilets can support roughly 1,300 to 1,500 people in a business office, about 2,250 people in a restaurant or assembly space, or 1,500 students in a school. This proposal contains 37 toilets. Again, there is no apparent reason to oversize the proposal and present inconsistent figures.

⁶ This assumes the day care center is consistent with the initial architectural renderings, which showed a nursery room, toddler room, preschool room, and elementary room, with a collective occupancy for 81 people. In the revised renderings, there is only a nursery with a host of other "flex rooms" and "offices," yet the applicant alleges that it will accommodate 35 enrollees. The "nursery" room is not big enough to accommodate 35 enrollees, as indicated in the architectural drawings. Again, the applicant is not providing candid information in its submissions. This serves to further obfuscate a clear picture of what the applicant is requesting, and it is yet another reason why the code requires new applications after revisions.

The applicant champions its own “oversized” parking lot, but, when accounting for the increased square footage and capacity, the number of parking spaces is inadequate to satisfy the standard. *See* BCC 91.605(5) (“A place of public assembly including church, stadium, arena, club, lodge, auditorium, meeting room, and undertaking establishment shall provide 1 space for each 100 square feet of gross floor area or 1 space for each 8 seats, whichever is greater.”); BCC 91.605(6) (“A day care center, residential facility, residential home, preschool nursery or kindergarten shall provide 2 spaces for each teacher or supervisor.”). The applicant alleges that it “proposes approximately 261 parking stalls for the proposed capacity of up to 500 attendees, exceeding the minimum parking requirement of 189 parking stalls.” 261 parking spots, however, is only an exceedance based upon 18,902 square feet, but that is not what the evidence submitted by the applicant demonstrates. To the contrary, the applicant would be required to have 285 parking spaces and then disclose the number of teachers or supervisors⁷ so that two spaces could be provided for each teacher or supervisor. The number of parking spaces required, therefore, would be closer to 300 than 261. The applicant also alleges that “[b]ecause the proposed Phase I parking supply satisfies the applicable minimum parking requirement, no parking variance is requested or required for the revised proposal.” In fact, it appears that the applicant is implementing its own parking variance by dramatically underestimating the square footage of the building and the number of attendees.

Next, the skewed figures also affect the necessary septic capacity. The applicant received septic feasibility permit approval from the Benton County Environmental Health Division for a 650-seat church, but, again, this is more than a church – in fact, a lot more than a church. The applicant alleges that their proposed septic is “oversized,” but that ignores the inconsistent numbers and oversized church and related requests (including day care center, gymnasium, playground, offices, flex spaces, vestibule, *etc.*). The applicant’s contradictory information undermines the sufficiency of the septic feasibility permit. Condition of Approval P-7 requires approval “to support the authorized structure(s) proposed for construction.” Here, the oversized structure will require much more than that which is sufficient for a 650-seat church. Instead, it will require enough for closer to 850-900 people or even thousands, depending on which figures are used.

⁷ This raises another issue for the applicant because in the first site plans/architectural renderings, for the day care center, the applicant includes the nursery room, toddler room, pre-school room, elementary room, but, in the revised submission, the applicant includes only a “nursery” but many “flex rooms” and offices” while alleging 35 enrollees.

Regardless of the reason for these inconsistent figures, the errors undermine the evidence purporting to satisfy approval standards, including the number of vehicle trips, the number of parking spaces, the adequacy of septic capacity, right-of-way improvements, and so forth. If the Board of Commissioners and the public cannot be given accurate information, then the Board of Commissioners should deny this application.

The Applicant's Request is Inconsistent, Unclear, and Omits Applications for Additional Conditional Uses and Uses not Clearly Permitted as Conditional Uses

Not only is the factual information for the applicant's request inconsistent but the requests themselves are inconsistent and unclear. Obviously, this frustrates the Commissioners and the public in evaluating and reviewing the proposal.

Inconsistent request regarding the playground

The applicant is presenting conflicting information on the proposed uses. On one hand, the applicant alleges that it is not seeking a variety of uses that it previously sought, yet some of those are still listed on the site plan and architectural renderings. For example, the applicant alleges that it is not seeking a playground, but a 3700 square foot playground is still included on their site plan. *See* Staff's Attachment B 119-120 (showing playground adjacent to the southwest of the main building); *compare* Staff's Attachment K.145 (showing playground to be 3700 square feet). It is not clear what other outdoor activities the applicant could anticipate putting into the "playground," such as recreational fields or even pickleball courts that it alleges it is no longer pursuing, but it is beyond dispute that the applicant is taking contradictory positions regarding the playground. For example, the applicant alleges in their revised materials that

"[r]eferences in the original application materials to the Phase II sanctuary, full campus buildout, amphitheater, pickleball courts, playground, expanded outdoor recreational amenities, or parking variance should be treated as background only. Those elements are not included in the approval request now before the Board."

Staff's Attachment B.3. Here, however, the applicant continues to include a 3,700 square foot playground in its site plans for its revised request. The applicant has also retained the same general footprint for the sanctuary/gymnasium building and it is not clear whether other amenities that were allegedly excluded are, in fact, excluded from the revised application. Again, the applicant is not setting forth a consistent story, which

deprives both the County and applicant of a full and fair opportunity to present their case.⁸ Finally, if the applicant is not presenting consistent information with regard to the playground, then it remains to be seen what other information and requests are inconsistent.

Multiple Sunday services and other activities that are unaccounted for in terms of effects

The applicant alleges that there will be “two Sunday morning services, currently scheduled for 8:30 a.m. and 10:15 a.m., with Sunday traffic generally spread between approximately 7:00 a.m. and 11:40 a.m.”⁹ Without evidence in support, the applicant alleges that there will 390 attendees at a service, without any further information as to the number of staff, day care enrollees, and so forth. That number, however, will be doubled with two services. The applicant alleges that “Sunday evening activities may include middle school youth group at approximately 4:00 p.m. and high school youth group at approximately 6:00 p.m.” Again, this just means more traffic, not even based upon the services. The applicant includes other actions that will occur at the church:

“Other anticipated activities include occasional adult meetings, four to five staff members on site Monday through Thursday from approximately 9:00 a.m. to 5:00 p.m., occasional evening classes or meetings two to three times per week with approximately 6 to 20 people, limited leadership meetings, men’s and women’s events, classes or seminars, and occasional weddings or memorials limited to the capacity of the building. Weekday daycare may be pursued in the future and would operate during normal business hours.”

This does not include weddings and funerals and “major events” referenced by the application but creates additional “attendees,” additional automobile trips, the necessity for additional parking spaces. As has been the tradition of the applicant at its current location, numerous high-volume major events, including ast events held at the existing

⁸ The Board of Commissioners actually anticipated such problems when promulgating the Benton County Code because once a land use application changes, BCC 51.525 requires the applicant to withdraw the application and submit a new application. The applicant has violated that particular provision, and, had it complied with the provisions, much of the inconsistencies could have been resolved.

⁹ Greenlight Engineering Report at 4 (“This statement demonstrates that the proposed use will generate recurring peak periods throughout the year.”); *id.* (“Additional events identified in written comments, including weddings and memorial services and other events, will further contribute to concentrated traffic conditions.”).

location, such as Holiday Bazaar, Trunk or Treat, and so forth. The applicant is also omitting the many non-Sunday masses that will also occur, including Christmas (and even midnight mass), Ash Wednesday, All Saints Day, and so on. Also, conspicuously, the applicant has not identified any uses for the gymnasium, which would draw crowds and athletes in numbers similar to Sunday services.¹⁰ If the applicant is requesting a gymnasium (which has no apparent connection to the religious activities), then the applicant will use that gymnasium, but the applicant is not candid about the use. The applicant is simply not being candid about what it proposes, which skews the impacts to the area and the requirement of the applicant.

Unaccounted for major events

At various times in its revised application, the application references “major events,” but it is not clear what these “major events” entail. For example, the applicant also alleges “operational and parking management measures” to address: “peak parking demand, including on-site parking management, volunteer parking coordination during peak services or major events,”¹¹ The applicant must disclose these “major events.” Past major events that the church has held, which drew overflow crowds and parking, include various holiday events, such Trunk or Treat, Holiday Bazaar, and so forth. If the traffic and attendee counts are not addressed, then the full effects to the transportation facilities and level of service¹² are then not accounted for. Indeed, “[t]he applicant has not provided any roadway or intersection level of service analysis, nor any operational analysis demonstrating the level of service at affected intersections.” Greenlight Report at 7 (“Without these analyses, the record does not demonstrate that the transportation system provides an adequate level of service for the proposed development.”). Simply put, the applicant has not disclosed the number and type of “major events,” which will have a major impact on traffic numbers and the number of attendees. This application creates more questions than answers.

¹⁰ A gymnasium is not a use customarily associated with the practices of the religious activity, and the applicant did not submit a request for a conditional use application.

¹¹ The applicant also references “major events” at staff’s Attachment B.4, K.41, and K.42. Despite these references to “major events,” it is altogether unclear what “major events” constitutes.

¹² ORS 215.441(2)(b) (a local government may “[p]rohibit or restrict the use of real property by a place of worship described in subsection (1) of this section if the county finds that the level of service of public facilities, including transportation, water supply, sewer and storm drain systems is not adequate to serve the place of worship described in subsection (1) of this section.”).

Unaccounted for Use: Gymnasium

In addition to a church, the applicant is requesting a gymnasium, as demonstrated by the outlined basketball hoops and basketball court within the area serving as the church. A gymnasium is not a permitted use and is not an explicit use provided for as a conditional use in the code. *See* BCC 63.105 (permitted uses); 63.205 (conditional uses). It is not clear that a “recreational facility” includes a gymnasium. If not, then a gymnasium is not a use allowed in the zone, and the request for a gymnasium must be denied. If a gymnasium is a “recreational facility,” then the applicant was required to submit a conditional use and account for the impacts from the use of the proposed building as a gymnasium. There is nothing in state or local law that allows the applicant to avoid submitting an application for a use that is listed as a conditional use. Despite including a gymnasium in its request, the applicant has not included *any allegations associated with the use of the gymnasium*, including frequency or numbers of attendees. Not only does the day care center increase the number of attendees¹³ for the overall church, but it also increases the traffic impacts, parking requirements, and septic capacity. Finally, there is nothing inherent in a gymnasium that would imply that it is customarily associated with the practices of the religious activity, and, and therefore, a conditional use application for a gymnasium was necessary, assuming it is even conditionally permitted. *See* ORS 215.441(1).

Unaccounted for conditional use: Day care center

The applicant has not included an application for a day care center, though the applicant alleges it is seeking a day care center for up to 35 children.¹⁴ While a day care center is permitted in conjunction with a church under state law, that does not mean the applicant is absolved from submitting a land use application for the conditional use, which affects the number and frequency of vehicle trips, number of attendees, capacity, and so forth. For a day care center with more than 13 attendees, a conditional use is required. *See* BCC 63.205 (listing “Day care center” as a “conditional use” in the Rural Residential zone); BCC 63.105 (listing “Day care center for fewer than 13 children” as a “permitted use” in the Rural Residential zone). There is nothing in state or local law that allows the applicant to avoid submitting an application for a use that is clearly listed as a

¹³ For example, while the sanctuary/gym area is intended to accommodate 500 attendees, there will also be children/enrollees and presumably staff operating the daycare center at the same time. As such, the 500-attendee figure is illusory because this is not just a church, it is much more than that, and that must be accounted for in the applicant’s materials.

¹⁴ The capacity appears to far exceed that which is necessary for 35 children.

conditional use. Not only does the day care center increase the number of attendees¹⁵ for the overall church, but it also increases the traffic impacts, parking requirements, and septic capacity because it means that the building will be used more frequently, just like the use of the gymnasium.

The application violates BCC 53.215(1) and (2)

BCC 53.215 provides criteria for conditional uses. Though the application does not include all conditional uses, even what is conceded violates the standards based upon the scope and size of the proposal, the traffic impacts and other undue burdens on public facilities, as well as the serious interference with adjacent uses and character of the area. ORS 53.215 provides as follows:

“The decision to approve a conditional use permit shall be based on findings that:

- (1) The proposed use does not seriously interfere with uses on adjacent property, with the character of the area, or with the purpose of the zone;
- (2) The proposed use does not impose an undue burden on any public improvements, facilities, utilities, or services available to the area; and
- (3) The proposed use complies with any additional criteria which may be required for the specific use by this code.”

Central to BCC 53.215 are the traffic-related concerns expressed in written and oral testimony of those within the area and most affected by the proposal.¹⁶ The traffic

¹⁵ For example, while the sanctuary/gym area is intended to accommodate 500 attendees, there will also be children and presumably staff operating the daycare center at the same time. As such, the 500-attendee figure is illusory because this is not just a church, it is much more than that, and that must be accounted for in the applicant’s materials.

¹⁶ Greenlight Report at 3 (“Benton County Code (BCC) 53.215 requires that the proposed use not impose an undue burden on public improvements, facilities, utilities, or services available to the area. The current transportation record does not demonstrate that this criterion has been satisfied.”). Where a local government’s TSP “identifies both average daily traffic and Design Hour Volume as important considerations when evaluating roadway function” and the “[t]he proposed development exceeds both measures,” an undue burden is obvious on its face. Greenlight Report at 5.

impacts include a clear reduction in safety for those using Powers Ave, especially for bicyclists and pedestrian activity (jogging, walking dogs, *etc.*). The traffic impacts also increase wear and tear on the road itself, which increases County maintenance costs, as well as contributing to the serious interference with the character of the area. Powers Avenue NW, Scenic Drive, and Oak Grove are rural, two-lane roads not designed to accommodate higher traffic volumes that would be generated by the proposed church. These issues are identified in more detail below.

Serious Interference with the Character of the Area, Adjacent Uses, and Purpose of the Zone

As for subsection (1), those that live in the area are the most affected, and they are the ones best capable of describing the serious interference with the character of the area, adjacent uses, and the purpose of the zone. Through written and oral testimony, the public identified serious interference with their uses and with the character of the area as it relates to the subject site's size, location, and surrounding uses, building height and square footage, sewage disposal, landscaping and separations, lighting, road access, parking, and noise. The visual character – size and scope – is unmatched on Powers Avenue and in the area (and that assumes that the size and scope of the proposal is supported by accurate figures, which they are not). Increased traffic introduces additional safety hazards, such as conflicts between vehicles and bikes and pedestrians. The volume of traffic is not consistent with the character of the area. Indeed, weekend church traffic will coincide with the time the residents of the surrounding neighborhood are using Powers Avenue, and there are “major events,” gymnasium use, weddings and funerals, and so forth that have not even been disclosed in relation to the frequency and intensity of traffic.

Apart from the extensive written and oral testimony from those in the affected area, I will address one particular example. Staff presented a chart comparing churches in various zones and their proximity to dwellings. Of the two rural residential zoned churches included, the proposed church is within 1,000 feet of roughly 100 dwellings and the other is within 1,000 feet of roughly 20 dwellings¹⁷. Of the other 4-5 zones, where uses were allowed outright and in urban residential zones, there were high numbers of

¹⁷ This second church in rural residential areas is removed from residences as compared to the proposal and it also abuts a busy road (Highway 99) and near train tracks, unlike the subject property. For the subject property, each abutting parcel contains a single-family dwelling. On the north side of Powers Ave are six parcels, four of which contain single-family homes accessed from Powers Ave.

dwelling. The subject proposal is unique in that it exists within a relatively high residential density, though the use is not permitted outright and not in an urban setting. This demonstrates that the proposal is anomalous and interferes with surrounding, predominantly residential uses. Staff's conclusion that religious institutions exist in areas "with both lower and higher surrounding densities supports the conclusion that a church use can be compatible with residential development patterns" misses the point. This proposal is unique in that it is situated amongst significant residential development that would normally occur in an urban residential zone or where the use is permitted outright. That is the lesson of Staff's residential density chart, and it reinforces the conclusion that this proposal would seriously interfere with the character of the area and adjacent uses.

Undue Burden on public improvements, facilities, utilities, or services available to the area

For subsection (2), the proposal will place an undue burden on public improvements, facilities, utilities, and services available to the area. Most importantly are the burdens on the transportation system. Notably, staff has not assessed the transportation improvements necessary to accommodate the increased traffic in the context of the inconsistent figures and unaccounted for uses. It is difficult to understand how the applicant has failed to set forth consistent figures and applications for all conditional uses at this point. These failures cannot be overlooked, and they undermine the applications' attempt to satisfy the criteria.

Given the size, scope, and capacity of the request, the transportation impacts are significant. The project will exceed the level of service for the road classification, and the Board of Commissioners have the authority to deny the application on those grounds under state and local law. *See* ORS 215.441(2)(b); BCC 53.215(2). Powers Avenue is classified as a Primary Local Road in the Benton County Transportation System Plan. Primary Local Roads are expected to have a maximum of 700 Average Daily Trips (ADT), and the horizontal design standard is two 2-ft wide gravel shoulders and two 10-ft wide paved drive lanes within a 50-ft right-of-way. Powers Avenue is currently deficient in terms of design standards, and the proposed uses will introduce such significant traffic that Powers will experience much greater than 990 ADT. *See* Greenlight Report at 2 ("the daily volume cap of 700 vehicles per day would be exceeded, with projected traffic volumes reaching approximately 990 vehicles per day on the east end of NW Powers Avenue. This finding demonstrates that the proposed development would generate traffic volumes beyond the level anticipated for the roadway based on its adopted functional classification."). The Greenlight Report notes that:

“the daily volume cap represents the level of traffic anticipated for the roadway based on its existing classification and intended function. A development that causes the roadway to exceed this threshold requires evaluation of whether the proposed use is consistent with the planned transportation system.”

Greenlight Report at 4; *id.* (“The proposed church also exceeds the roadway’s DHV threshold per Benton County’s analysis. Based on the trip generation estimates prepared by DKS Associates, the proposed church is expected to generate approximately 270 vehicle trips during the Sunday peak hour alone. This exceeds the 100 vehicles/hour DHV threshold associated with the local road classification of NW Powers Avenue.”). Based on these figures alone, the applicant is placing an undue burden on the transportation facilities, which conflict with the County’s adopted TSP. However, that does not even account for the uses not requested in separate applications, including the gymnasium and day care center, and the actual traffic figures from the dramatically increased square footage and number of attendees.

Public Works staff evaluated both traffic reports and concluded 505 trips will move through the west intersection and 990 trips will move through the east intersection. *See* Greenlight Engineering Report at 1 (“the proposed development would generate traffic volumes exceeding the adopted assumptions for the roadway classification of NW Powers Avenue, including both the roadway’s daily traffic volume cap and Design Hour Volume (DHV) threshold.”). As noted, the proposed development will increase traffic on Powers Avenue to levels that exceed what is expected for a Primary Local Road. The proposal will also increase wear and tear on the road compared to residential development. This means major pavement maintenance will be required more frequently, which causes an undue burden on the physical structure of the road, and those impacts will be borne by the County and the public.

The applicant alleged that the proposal would not contribute traffic that would exceed the 700 ADT threshold. County staff, however, submitted a June 17, 2026, memo, identifying multiple weaknesses in the applicant’s traffic analysis.¹⁸ To assist staff, DKS Associates were retained to provide a trip generation report to estimate the number of trips that would be generated by the proposed use. Analysis in the DKS report is based on the proposed 500-seat church as compared to the Sandow study which was

¹⁸ Greenlight Report at 9 (“The applicant’s trip generation methodology has changed throughout the review process. This issue is significant because the trip generation estimate forms the foundation for evaluating the transportation impacts of the proposed development.”).

based on the square footage of the church. However, as noted above, because the capacity is far greater than 500 persons for the church and its multiple, proposed uses and the square footage is dramatically incorrect, neither the DKS study nor the Sandow study accurately reflects the traffic impacts.

Public Works also found that the proposed development will likely accelerate deterioration of Powers Avenue due to the added traffic generated by the use. The existing pavement on Powers Avenue is a combination of oil mat, asphalt overlay, and chip seal overlay. The pavement depth varies widely between three and six inches. Both the pavement shoulder and travel lane widths do not meet current standards, and the traffic resulting from the proposed use exceeds volumes that would be generated by residential development according to the current zoning. The above impacts will impose an undue burden on the public improvements that must occur and the transportation facilities. Moreover, Public Works staff noted that a variety of utilities will have to be relocated to address the substandard road width.

To mitigate these impacts, staff recommended a condition of approval that requires the applicant to provide a 24-foot-wide paved section with 2-foot aggregate shoulders on Powers Avenue from the west property line of the subject parcel to Scenic Drive given the existing right-of-way and other constraints elsewhere in the corridor. The asphalt and base rock thickness section for this widening shall follow Primary Local Standards (Condition of Approval P-12).¹⁹ This condition is not only proportional but it has a clear nexus with the application and its effects. Importantly, staff recommend denial of the application if this, or a similar Condition of Approval is not applied to enhance safety for pedestrians and bicyclists along Powers Avenue in response to the increased amount of vehicle traffic the church/gymnasium/day care center/major events/etc. would generate. Regardless of this condition, the application imposes undue burdens on transportation improvements and facilities because the remainder of Powers Avenue will still be subject to volumes of traffic far above its level of service and classification. Furthermore, it is not clear that such a condition is the correct consideration because “[t]he issue is whether NW Powers Avenue should be reclassified through the County’s transportation planning process.” Greenlight Report at 5. Where a

¹⁹ Greenlight Engineering notes that increasing classifications should not be done through an *ad hoc* process but rather the TSP update process: “If the roadway requires a higher classification and associated improvements to serve the proposed development, those changes should occur through the Benton County Transportation System Plan (TSP) update process rather than through a condition of approval for a single development.” Greenlight Report at 1-2.

development would implicate the “transportation planning process” through an updated TUS, that is exactly the type of undue burden contemplated in BCC 53.215(2).

For utilities, existing mailboxes, utility pedestals, and a power pole along Powers Ave and the subject property’s frontage, these will have to be relocated in conjunction with the required road improvements, further imposing undue burdens on the County and the transportation facilities and utilities. A City of Albany fire hydrant is also located on the south side of Powers Avenue NW at ~MP 0.48. The hydrant is currently placed a foot off the pavement, in a location where it constitutes a roadside hazard based on the posted speed limit. This hydrant must be relocated at the time of required road improvements associated with the proposed development. There are also at least two water meter boxes and one air release valve that must also be relocated as outlined in Condition of Approval P-5. Clearly, these improvements to utilities impose an undue burden on the County, the transportation system, and public utilities. The relocation costs could be significant.

As indicated throughout this testimony, my client employed the services of Greenlight Engineering, a transportation engineering firm, to review the application and appeal.²⁰ Greenlight concluded that “the transportation materials submitted by the applicant do not provide sufficient technical evidence demonstrating that the proposed Northside Christian Church development can be approved consistent with Benton County transportation standards.” Greenlight Report at 1 (referencing BCC 53.215). Specifically, the Greenlight Report notes that this record omits the transportation documentation typically associated with the applicant’s conclusions, including “intersection operational analysis; queue analysis; left-turn lane analysis; crash analysis; or a comprehensive safety evaluation.” *Id.* at 3. Other issues such as compliance with Benton County access management standards and safety issues and site distance at the NW Powers Avenue/NW Oak Grove Drive intersection have not been evaluated.²¹ *Id.* Finally, the applicant has wholly failed to evaluate whether “a left-turn lane or other

²⁰ This testimony adopts and incorporates the Greenlight Report as if set forth here fully.

²¹ Greenlight Report at 10 (“The applicant’s transportation materials do not evaluate whether the proposed main driveway complies with this access spacing standard. However, based on the submitted site plan, the proposed driveway appears to be located within the required spacing distance of an existing residential access point on the north side of NW Powers Avenue. As shown on the site plan, the distance between the proposed church driveway and the existing residential driveway is approximately 30 feet when measured from edge to edge. When measured from driveway centerline to driveway centerline, the separation is approximately 65 feet. Both measurements are less than the 100 foot minimum access spacing standard identified in the Benton County TSP.”).

operational improvements may be warranted at Scenic Ridge Drive/NW Powers Avenue.” *Id.* If these failures are unaccounted for, then the applicant – with its proposal – will be imposing undue burdens on the County and the taxpayers to address the problems in violation of BCC 53.215(2).

Greenlight, at page 8 of its report, also notes that the TSP contains new

“tools [that] provide a metric for assessing the impacts of new development on the existing transportation system and for identifying where capacity improvements may be needed to sustain the transportation system as growth and development occur... All roadways and intersections owned by Benton County must operate at or below the following mobility targets.”

The TSP adopted specific standards, including the following:

“Two-way Stop and Yield Controlled Intersections: All intersection approaches serving more than 20 vehicles during the highest one-hour period on an average weekday (typically, but not always the evening peak period between 4 p.m. and 6 p.m. during the spring or fall) shall operate with a v/c ratio not higher than 0.90. Mobility targets do not apply to approaches at intersections serving 20 vehicles or fewer during the peak hour.”

The applicant’s traffic analysis, however, failed to “provide evidence demonstrating that the applicable Benton County mobility standards are met at affected intersections,” including “intersection operational analysis or volume-to-capacity calculations demonstrating that affected intersections will operate within the adopted mobility targets.” Without any such analysis, the applicant hollowly alleges that the “proposed development will not create congestion or operational deficiencies.” The applicant’s failures will cost the County dearly in terms of traffic improvements, relocation of utilities, and analysis, imposing the undue burden identified in BCC 53.215.

Off-Street Parking Standards have not been Satisfied for the Capacity of the Structures

Under BCC 91.605, the applicant must include the requisite off-street parking for particular uses. *See* BCC 91.605(5) (“A place of public assembly including church, stadium, arena, club, lodge, auditorium, meeting room, and undertaking establishment shall provide 1 space for each 100 square feet of gross floor area or 1 space for each 8 seats, whichever is greater.”); BCC 91.605(6) (“A day care center, residential facility, residential home, preschool nursery or kindergarten shall provide 2 spaces for each

teacher or supervisor.”). The applicant must account for the church, the day care center, the gymnasium, the offices, the flex rooms, and the playground, as well as the *actual figures related to the square footage and number of attendees*. Without accurate and consistent information, it is impossible to identify the correct number of off-street parking spaces. However, when using the correct square footage and number of attendees (though it still remains unclear), the applicant would need more than 280 parking spaces and likely more than 300 parking spaces. This requires that one account for the square footage and some unknown number of additional spaces for the day care center (and the gymnasium, which has not been addressed at all) because the applicant has not disclosed the number of teachers or supervisors or the frequency and types of uses associated with a gymnasium. Because the applicant has not provided consistent factual information to satisfy the standards, the application cannot be approved.

The applicant failed to submit a new application upon revision of the application

The applicant failed to submit a new application upon revision of its application before the Planning Commission. Under BCC 51.525, “[i]f the applicant proposes a revision to the application that changes the type of land use action or limited land use decision requested in the initial application, the applicant shall withdraw the initial application and shall file a new application for the revised request.”²² Withdrawal of an application is governed by BCC 51.530(1), which allows for the applicant to:

“submit a written request to the Planning Official to withdraw an application prior to a decision to approve or deny the application. The Planning Official may refund all or part of the application fee based upon the amount of County staff work completed prior to the withdrawal.”

Here, as noted above, the applicant dramatically changed the type of land use action from phase 1 and 2 to only phase 1. Phase 2 included a variety of land use requests, including a gymnasium, a sanctuary, an amphitheater, a day care center, pickleball courts, recreational fields, and more. The applicant, therefore, “change[d]” its land use action and failed to withdraw its existing application. The BCC plainly requires withdrawal and submittal of a new application. My client was required to expend funds and prepare further testimony for an application that should no longer be active. This prejudices my client’s substantial rights to a full and fair hearing, requiring him to expend funds, spend

²² Importantly, this standard only requires a “change,” not an increase in the scope of the application.

time reviewing a changed application, and attend hearings that should not be occurring under BCC 51.525. The application should be denied on this failure alone.

The Subject Property is not Lawfully Established

County staff concede that the subject property was unlawfully divided in 2006:

“Benton County records confirm the subject property was lawfully created by deed (deed 2006-407551; Benton County Deed Records) in 1953. A subsequent deed recorded in 2006 describes the property as two separate parcels; however, there is no record of land division approval allowing the property to be divided. Therefore, the 2006 deed constitutes an unlawful division of land, and the property owner must record a corrected deed description (regardless of approval or denial of the current request).”

The 2006 deed was an unlawful division, resulting in two unlawfully created units of land. *See LandWatch Lane County v. Lane County*, 80 Or LUBA 415 (2019). Staff proposes a corrected deed description, but a corrected deed description does not and cannot undo an unlawful division of land. *See Yamhill County v. Ludwick*, 294 Or 778, 663 P2d 398 (1983); *Maxwell v. Lane County*, 178 Or App 210, 35 P3d 1128 (2001) (“a local government entity must determine the legal status of a lot or parcel ‘in connection with’ a current proceeding involving the parcel if required to do so by ‘applicable legislation.’”). In fact, an alleged corrected deed would be contrary to and violate ORS 92.017(1) (“A lawfully created lot or parcel remains a discrete lot or parcel unless the lot or parcel lines are vacated or the lot or parcel is further divided as provided by law.”). Therefore, the proposed action and condition of approval requiring consolidation through a deed correction will violate state law because a deed correction cannot remedy an unlawfully established unit of land.

When a local code provision includes the requirement for a “lot or parcel,” caselaw has established that the lot or parcel have been lawfully established. *See Friends of Yamhill County v. Yamhill County*, 229 Or App 188, 211 P3d 297 (2009) (that a reference to “lot” or “parcel” implied a “legal lot” or legal parcel” i.e., a lot or parcel that was lawfully established). Here, the definition of “property line” includes reference to “lots or parcels.”²³ “Property line,” in turn, is identified in both the definition of

²³ “‘Property Line’ means the exterior boundary of a lot or parcel. For contiguous lots or parcels held in common ownership and combined for development purposes, the property

“setback,”²⁴ which is applicable, and Official Zoning Map²⁵. Therefore, any standards, such as setbacks, or use of or interpretation of the Official Zoning Map requires that the subject property have been lawfully established. Here, there is no dispute that the subject property was lawfully established by the 2006 deed.

The County Board of Commissioners are authorized to impose conditions

The County Board of Commissioners is authorized to impose conditions of approval, pursuant to BCC 53.220, for a host of subjects. BCC 53.220 (size and location of site; road capacities in the area; number and location of road access points; location and amount of off-street parking; internal traffic circulation; fencing, screening and landscape separations; height and square footage of a building; signs; exterior lighting; noise, vibration, air pollution, and other environmental influences; water supply and sewage disposal; law enforcement and fire protection). Neighbors have identified numerous proposed conditions to address the impacts of the proposal, but some of these impacts cannot be conditioned away, such as volume and frequency of traffic.

line for purposes of setbacks shall be the exterior boundary of the combined lots or parcels. Unless otherwise specified, setbacks set forth in this code shall be measured to the property line.” BCC 51.020(51).

²⁴ “‘Setback’ means the minimum allowable horizontal distance from a given line of reference (usually a property line) to the nearest vertical wall of a structure. BCC 61.020(69)

²⁵ The Official Zoning Map is interpreted as follows, according to BCC 51.110(4):

“(4) Interpretation of the zoning map shall comply with the following:

- (a) Zone boundaries are generally intended to coincide with discernable geographic features or property lines. In cases where a zone line crosses a lot or parcel without reference to a specific landmark (such as a road or stream), it may be necessary to consult the record of hearings that led to adoption of the Zoning Map, or other relevant information, in order to determine the precise location of the zone line.

* * * *

- (c) Zone boundaries that are indicated as approximately following city limits, urban growth boundaries, or property lines shall be construed to follow those lines.”

The Board can Deny the Application without Violating RLUIPA

The applicant has alleged that denial of the application will violate the Religious Land Use Institutionalized and Persons Act (RLUIPA). The applicant, however, is mistaken, and the applicant is misconstruing RLUIPA and its caselaw. RLUIPA prohibits local governments from asserting regulations that impose a “substantial burden,” which is “one that pressured someone to forgo or modify the expression of a religious belief. *Corp. of the Presiding Bishop v. City of West Linn*, 338 Or 453, 111 P3d 1123 (2005). In *Westchester Day School v. Village of Mamaroneck*, 386 F.3d 183 (2d Cir. 2004), at issue was a denial of permit to allow the school to construct a new building and renovate others, and the Court determined that it did not create a substantial burden on the school’s religious exercise because the local government denied “only the application submitted, leaving open the possibility that a modification of the proposal, coupled with the submission of satisfactory data found to have been lacking in the earlier proceedings, would result in approval.” If, on the other hand, a denial seems disingenuous, then that could result in a “substantial burden” but “a mere denial, without more, d[oes] not constitute a substantial burden.” *City of West Linn*, 111 P3d at 1129.

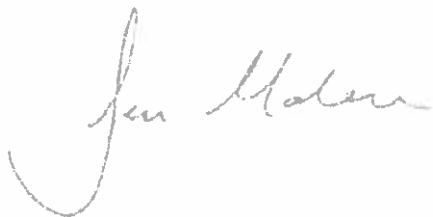
This case is similar to *San Jose Christian College v. City of Morgan Hill*, 360 F.3d 1024 (9th Cir. 2004), where the applicant submitted “inconsistent” information as to the number of students. Here, the applicant has submitted inconsistent information as to square footage, attendees, and traffic counts, as well as failed to submit all the necessary conditional use applications. The requirement to submit a “complete application” and accurate factual information does not impose a “substantial burden,” according to *San Jose Christian College*. Here, the County can feel secure in its denial given the similar failures in *San Jose Christian College*. Consistent with these cases, the Oregon Supreme Court, in *City of West Linn*, concluded that “a government regulation [] imposes a substantial burden on religious exercise only if it ‘pressures’ or ‘forces’ a choice between following religious precepts and forfeiting certain benefits, on the other hand, and abandoning one or more of those precepts in order to obtain the benefits, on the other hand.” 111 P3d at 1130. Submitting a new application that is complete, accurate, and consistent does not impose a substantial burden under RLUIPA. In fact, that is required of all applicants if they want their application approved. Finally, where there is no substantial burden, as is the case here, there is no need to even entertain whether the government has a compelling interest that supports the denial and whether the denial is

the least restrictive means to further that interest. Here, regardless, the local government has a compelling interest in requiring consistent factual information for purposes determining traffic impacts, numbers of attendees, and so forth for purposes of complying with local and state criteria. *See* BCC 53.215 and ORS 215.441(2)(b).

There is also no evidence to demonstrate that a road exaction would treat the applicant on less than equal terms to similarly situated nonreligious uses. Any required improvement through a condition has no relation to the religious institution but rather impacts to the roadway. If a school were to result in similar levels of traffic, then the condition would be the same. In other words, there is no evidence to demonstrate that the condition would only be aimed at a religious institution.²⁶

For the above reasons, the Board of Commissioners have the authority to deny the application because the applicant has presented inconsistent information about the square footage of the building – undercounting by roughly 1/3 – and the number of attendees, *inter alia*. These failures skew the alleged evidence in support of the approval criteria, and it fundamentally frustrates the ability of the public and the Board of Commissioners to review and evaluate the application. Therefore, I respectfully request that the Board of Commissioners affirm the Planning Commission's denial and deny the appeal. I am available to prepare or assist in preparing findings in support of a denial.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sean T. Malone".

Sean T. Malone
Attorney for Cary Hoffer

Cc:
Client

²⁶ Again, the applicant includes uses that are not customarily associated with religious practices, such as a gymnasium.

Ross Jackson Testimony for LU-25-067
3935 NW Terra Lynda DR, North Albany

Thank you, Commissioners, for considering my testimony.

In February of 1990 my realtor called me and said that "we must go see a house now." He picked us up, drove to North Albany, and turned onto Powers. We passed a filbert orchard, and a open field with a nostalgic barn, and as we cleared the rise in th street, I told my wife "This is where I want to live." We hadn't even seen the house yet, and when we did, it didn't meet all that we wanted but we decided we could add what we needed. We bought the place that day, and it hadn't even been put on the open market yet. That was 36 years and 5 months ago.

I had previously lived near the intersection of Highway 20 and Scenic and traveled Scenic many times to see friends but I never knew what Powers was about until then. It was a quiet neighborhood that almost nobody knew existed, and where folks waved at us as we drove by. I have since added to and updated the house and invested many summers to make the property be what I love.

I miss the Filbert trees. And I miss the forest that came all the way to my back fence, a home to deer, racoons, possums, skunks, owls, nesting birds, and frogs at night. I do still have the gophers, by the way, and the dark nights, and the quiet that I need to keep my PTSD at bay.

You have heard and read testimony from leaders and members of Northside, their lawyers and their chosen professionals on the Powers' environment. What you may or may not have researched

are posts and videos on their websites or on related opinion websites. I have. When I read through the letters submitted in support, I did not find much content that addressed the concerns about the project. Mostly what I read was history of their successes and aspirations, that they believe their programs “will benefit the community” and a little bit about how they have worked hard on the plans.

I believe that Benton County is being gaslit and the applicant’s intention goes well beyond what is in front of you.

My neighbors have brought to your attention the unanswered questions, the conflicting statements, and how much ambiguity is in their documents. One Facebook post declared it is their property and they can do what they want. Another wrote a response to my post that I “am reaching for straws.” I would say to both “Not so!”

I have read posts that speculate Urban growth is going to happen, and that the neighbors should accept the inevitable. I do not believe that can happen around Powers because of the RR-2 zoning. There is a specific zoning code for the areas that are expected to be included within the Urban Growth boundary.

There are statements that if they are denied, a developer will build 9 houses with 9 driveways onto Powers, and I have to laugh! I can accept housing. I believe because of the wetlands, there won’t be 9 homes, and they can share a single access point at the crest of the rise where they can see both directions. The difference is a developer would be required to follow RR2 zoning. The applicant’s response to required road improvements is a plan to only upgrade their frontage. How are vehicles supposed to

reach their frontage without dropping from the sky or by some secret tunnel? Their plan will not mitigate safety issues based on the construction or the topography of Powers "Avenue." And a two-year-old traffic study does not reflect current use or condition of the road.

My main concern is there will be more phases that may or may not seek your approval once Phase 1 has been completed. Their attendance is already 350 and their stated expectation for growth is 25% each year. In the Staff Report, the table on page 13 of 26 indicates only 1 approval for a church in a Rural Residential zone. St. Anne Orthodox Church is a small facility, is stable at around 100 parishioners, and has only 21 residences within 1000 feet. That is significantly different than a 28,000 foot facility, a growing congregation of 380 average attendance, and in proximity to 100 residences. By the information presented, this project compares only to the larger facilities which are zoned Urban Residential.

I, along with 91 of the directly affected residents, are in opposition to LU-25-067. you have the right to deny this application and our attorney (Sean Malone as well as many members of our neighborhood) are very willing to prepare findings for this denial.

Many of the area residents are retired and home much of the time. You won't have to live in close proximity to the impact of your approval – We will.

August 4, 2026

Thank you for the opportunity to speak today and state why I oppose the proposal.

My name is Elena Gorman and I live on Knollwood drive on the property immediately neighboring the west side of the Powers field. We are newer to the neighborhood having moved here from Corvallis 2.5 years ago when I retired from my position as a pathologist and professor at the Veterinary Teaching Hospital. For those of you who are familiar with Corvallis, we lived for 20 years on 30th street, 3 blocks immediately north of campus. Therefore, I am very familiar with the pitfalls of living adjacent to a campus. While convenient for my 10-minute walk to work, the constant traffic, noise, unending construction and frequent events, made for a less than peaceful (often outright chaotic) neighborhood. On event days, traffic is terrible and you must time your errands to avoid major backups; when you return, you often park blocks away from your house because parking overflows the lots and invades the surrounding streets. Loud music, voices, parties, and even fireworks are a regular occurrence in that area. Therefore, we started actively looking for an established home on a quiet piece of land years ago. Finding our spot on Knollwood was a godsend and the current character of the area is exactly what we had been searching for; our drive dead ends at that beautiful grove of older growth trees with the meadow below. Last summer, when we learned of the scope of the construction proposed for the site, we felt completely blindsided and we've been devastated over the thought of losing the very reason we came here in the first place. We've been under this Damocles sword of dread for a while now and have found this whole process, including our need to protest it, exhausting, depressing and demoralizing.

To restate, I've lived next to a campus and I know the challenges and exactly how disruptive it is. Any allowance for such a large facility to be built in our residential rural area will have disastrous consequences on the character of our neighborhood and the well-being of the neighbors. No amount of mitigation can be done to minimize the irrevocable damage to the area, and allowing for such a structure undermines the intent of R2 zoning codes. I implore Northside to desist in this endeavor to obliterate Powers field and forever change our home. There are options available. I respectfully ask the Commissioners to use your authority to deny this application outright.

Thank you for your attention,

Elena Gorman, Doctor of Veterinary Medicine - retired

Kelly Rose

Superior, Oregon

8/4/2026

Good afternoon, Commissioners.

I want to start by acknowledging something important: I understand that Northside has said they're looking for a rural, natural setting for their facility. I can empathize with that. I can also empathize with the possibility that they're now experiencing some buyer's remorse after purchasing the property at 4500 Powers Avenue.

But empathy doesn't change the facts before you. This site is zoned Rural Residential (RR-2) with a two-acre minimum, and Northside knew at the time of purchase that they would need multiple conditional use approvals. The bigger question is whether the scale of what they're proposing is appropriate—or even feasible—on this specific 19-acre property. Let's look at the actual **RR-2 math**:

- **Building Scale:** Under standard RR-2 zoning, an average 2,000-square-foot house across a maximum of 10 properties yields about 20,000 square feet of total building space—not Northside's 26,000 square feet, and certainly not their future expansion plans.
- **Septic & Occupancy:** A standard buildout supports roughly 25 people (at 2.5 per household)—not the 500 to 1,000 people proposed. Meanwhile, BCC has denied septic permits on this terrain for single-person abodes.
- **Parking & Traffic:** A compliant rural-residential use would result in about 25 cars, not a **260-vehicle parking lot**. Local roads like Powers Avenue typically see fewer than 100 vehicles per day, and **fewer than two dozen** on a Sunday. Yet Northside's 260-car lot is poised to generate over **1,040 trips per day** on Sundays alone.

Environmental & Regulatory Realities

Furthermore, over 30% of the site is floodplain soils with strict requirements, yet Northside's geotechnical firm avoided coring in them. They also bypass standard RR-2 setbacks and rules limiting major events to four per year, instead scheduling events weekly in the summer and twice monthly year-round.

While property owners on and around Powers Avenue must strictly adhere to RR-2 setbacks (a 25-foot minimum for some structures like parking lots, and 40 feet for buildings), noise ordinances, and wetland mitigation requirements, the applicant seeks to bypass them.

We also see clear rule violations: Oregon and BCC regulations only allow for a limited number—four per year—of major events. Yet the applicant's own calendar and online statements detailing all-night parties, outdoor services, and special events demonstrate a

frequency of two or more per month, ramping up to weekly in the summers, far exceeding that rule.

The Broader Impact & Precedent

The inaccurate and unclear information provided by the applicant is already **posing an undue burden on BCC, the taxpayers, and the neighborhood**—a clear violation of **BCC 53.185**. If this plan goes forward, those burdens and impacts, including threats to county services, lighting, roadways, noise, and security, will only grow.

Northside may want to be in a rural setting—but what they've described is not a small, quiet church. It resembles a large multi-use private complex, more like a YMCA, which belongs inside the urban growth boundary. The property and the multiple conditional uses proposed do not comply with zoning requirements.

Benton County taxpayers far beyond Powers Avenue are deeply concerned that **if BCC grants this conditional use would undermine Rural Residential zoning countywide**. Approval would pave the way for future non-traditional uses of rural residential lands, such as data centers, distribution centers, and other large-scale installations that fundamentally conflict with the integrity of RR-2. **Please see our signature pages, gathered over the last two weeks at the Corvallis Farmers' Market, reflecting this widespread community opposition.**

Fundamentally, **the risks and undue burden** to taxpayers regarding costs, infrastructure, and zoning integrity underscore the BCC's responsibility to deny this request outright. Approving it risks significant impacts while setting a dangerous precedent that puts all rural residential land at risk.

To support the BCC in safeguarding our community, our legal counsel, Sean Malone, is available to help draft findings in support of a denial.

Thank you for your time.

Helly Rose

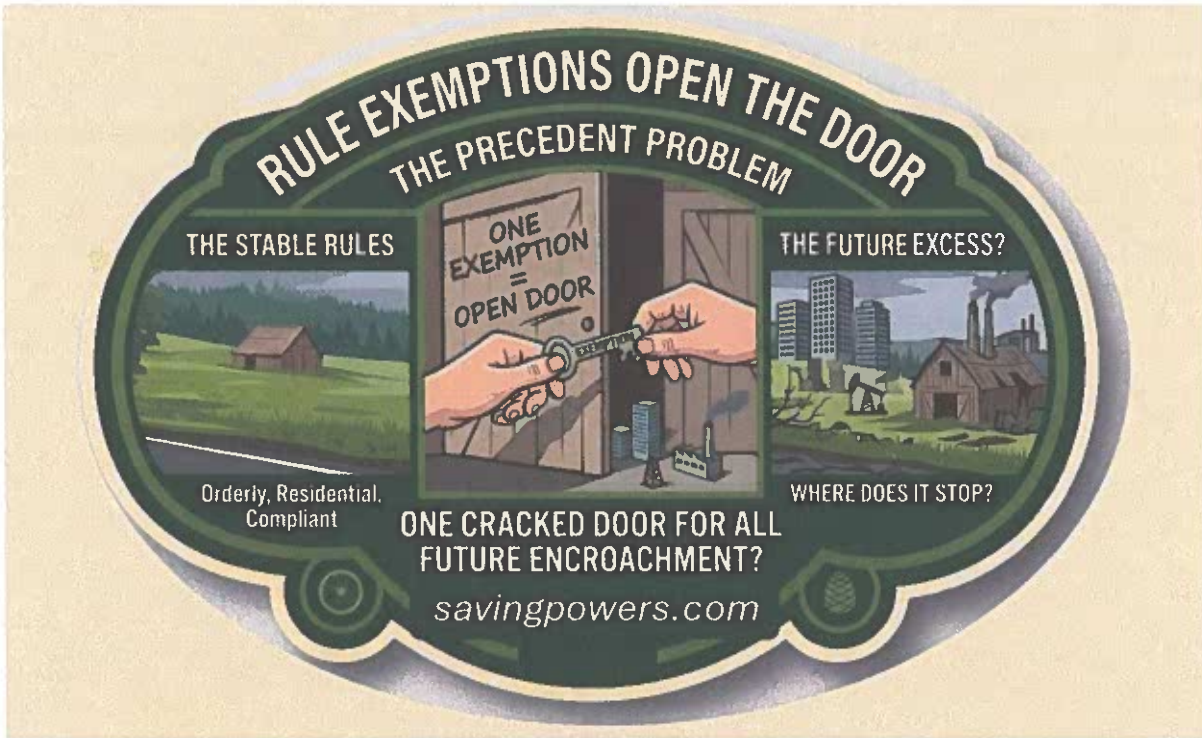



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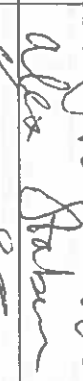
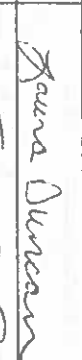
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[savingpowers.com](https://www.savingpowers.com)



Kelly Rose

Saving Powers Signatures of Support

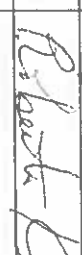
Thank you for signing in support of the Saving Powers effort. By doing so, you are showing support for the preservation of zoning rules, and the protection of land, wildlife, and livability in Benton County's rural areas.

Date	Printed Name	Email or Phone (we will NOT contact you or sell)	Zip Code	Signature
7/25	Janine Euehrer	unfuel6@aol.com	97330	
7/25	Lori Dore	lorikd57@gmail.com	97330	
7/25	Anne McArthur	bluecat7@gmail.com	97330	
7-25	Jeff Goodwin	541-207-7037	next first	
7-25	George Strath	541-602-4339	97330	
7-25	Raymond Sorensen	541.542.1390	97330	
7/25	Mickenz Sencer	541-570-0222	97322	
9/23	Chelsi Allen			
7/25	Alexandra Staben	541-911-2524	97330	
7/25	Ryan Staben	541-905-7795	97330	
7/25	Stanley Hamilton	541-515-7934	97330	
7/25	Susan Bushick	541 981 0388	97330	
7-25	Laura Duncan	541-760-1532	97333	
7-25	Greg Groun	520-921-2192	85704	
7-25	Karen Groun	520-405-1231	85704	
7-25	Teresa Latham-Snell	541-231-9893	97333	
7-25	Debbie Kessler	Debbieat70@gmail.com	97333	
7-25	Robert Kessler	celiberty@comcast.net	97333	
7/26	Pat Patrick	541-230-1732	97330	
7/26	Joyce Martin	503 459 9447	97370	

Date	Name, printed	email or phone	zip code	Signature
7-26	Laver Chart	541-979-1276	97321	Laver Chart
7-26	Sally Clark	sageplateau@gmail.com	97321	Sally Clark
7-26	Aya Garz	dasanz67@web.de	97321	Aya Garz
7-26	Michi Garz	michigarz@googlemail.com	97321	M. Garz
7/26	Katja Horan	dattel67@comcast.net	97321	Katja Horan
7/26	Sally Chart	laverandstacy@comcast.net	97321	Sally Chart
7/26	Anne Morgan	amwille44@yahoo.com	97321	Anne Morgan
7/26	Cathy Terry Weekly	cjweekly@yahoo.com	97321	Cathy Terry Weekly
7-26	Kenneth Walters	atms427@earthlink.net	97321	Kenneth Walters
7/26	Evika Walters	walters6822@comcast.net	97321	Evika Walters
7/26	Steve Gorman	megorman@moonpeak.com	97321	Steve Gorman
7/26	PATRICK GORMAN	patrickgorman@moonpeak.com	97321	Patrick Gorman
7/26	Margaret Rumsey	margaret.rumsey@gmail.com	97321	Margaret Rumsey
7/26	Tared Rumsey	jmrumsy92@gmail.com	97321	Tared Rumsey
7/26	Yvette Gorman	qv1-qv@earthlink.net	97321	Yvette Gorman
7/26	Jeanie Storer	storerjeanie3@gmail.com	97322	Jeanie Storer
7/26	W. Stands Dill	WSTANDS@outlook.com	97321	W. Stands Dill
7/26	Sara Dill	lomadora@gmail.com	97321	Sara Dill
7/26	CARY HOFFER	caryhoffer@hotmail.com	97321	Cary Hoffer

Saving Powers Signatures of Support

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Date	Printed Name	Email or Phone (we will NOT contact you or sell)	Zip Code	Signature
7-21-26	BRUCE THORNTON	BRUCE@THORNTON.COM	97330	
7-25-26	Sam Fridge		97330	
7-25-26	Jan Fridge		97330	
7/25/26	Michael Bracken	Michael.Bracken@trai.com	97330	
7-25-26	Mike Glass		97330	
7-25-26	Bail Glass		97330	
7-25-26	Deborah Finishing	deborah@finishing.com	97330	
7-25-26	Erson Monsaoui	erson@monsai.com	97333	
7-25-26	Becky Oeder	beckyoeder50@gmail.com	97330	
7-25-26	Jens Bernhard	jensbernhard@gmail.com	97330	
7-25-26	Delaney Baker	delaneybaker@gmail.com	97333	
7-25-26	Bandi Baker	bandibaker@gmail.com	75630	
7-25-26	Thomas Stom	thomastom@gmail.com	97330	
7-25-26	John Oeder	johnoeder@gmail.com	97330	
7-25-26	Martene Massey	martene.massey@gmail.com	97330	
7-25-26	Robert K Smith	robertsmith@gmail.com	97330	
7-25-26	Cass Slack		97333	
7/25/26	Camie Brock			
7/25/26	Drew Roberts	drewroberts@gmail.com	97330	
7/25/26	Maria Fridge	mariafridge@gmail.com	97332	
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7/25/2026	DAVID ALMAN	daide@maneybooks.com	97330	
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7/25/26	Jerry Friesen		97327	
7/25/26	Nancy Friesen	nancyfriesen@gmail.com		
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7/25/26	GERALYN BRAUNMAN	geraldynbraunman@gmail.com	97338	
7/25/26	Rebekah Averette	rebekeaverette@gmail.com		
7-25-20	Donna Joiner		97330	
7-25-26	Carolyn Lambach	carolynlambachperfect@gmail.com	97321	
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7/25/26	Jennifer Bauer	jrbauer1204@gmail.com	97321	
7/25/26	Daniel Bauer	da.bauer1204@gmail.com	97321	
7/25/26	Gabriel Cresson	gabrielcresson@gmail.com	97321	
7/25/26	Cathy Summers	summerscathy@gmail.com	97321	
7/25/26	Donna Conney	jo-katz@gmail.com	97322	
7/25/26	W. Liana A. Summers	summerswliana@gmail.com	97321	
7/25/26	Jessica Rabbeluth	jrabbeluth@gmail.com	97321	
7/25/26	Whitney Cresson	whitneycresson@gmail.com	97321	
7/25/26	Casey Yarnall	casey.yarnall@gmail.com	97322	

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Date	Printed Name	Email or Phone (we will NOT contact you or sell)	Zip Code	Signature
7-29-11	ADIEL MIGET	MIGETDAV59@COMcast.net	97332	Adiel Miget
7-29-11	Matthew J. Erhardt	mje216@gmail.com	97333	Matthew J. Erhardt
7/29/11	Karen Canan	KAREN.CANAN349@gmail.com	97332	Karen Canan
7/29/11	BRADLEY F. FANES	bradley.f.fanes@att.net	97332	Bradley F. Fanes
7/29/11	Nicole Lock	caschlanw@comcast.net	97332	Nicole Lock
7-29-11	Debra Hartsborn	recreationeskyglobal.net	97321	Debra Hartsborn
7-29-11	Kirsten Giam	kurtgiam@gmail.com	97330	Kirsten Giam
	Emily Giam McDanel	emilyst.mcdanel@gmail.com	97330	Emily Giam McDanel
	Hector M. Rodriguez	hmesurf@comcast.net	97333	Hector M. Rodriguez
7-29-11	Levi Juarez	levi.juarez@gmail.com	97333	Levi Juarez
7/29	Elizabeth Brown	elizabethbrown15@gmail.com	97333	Elizabeth Brown
7/29	Beth Merrill	betmerrill@gmail.com	97333	Beth Merrill
7/29	Rebecca Lewis	smith.nicetad@gmail.com	97333	Rebecca Lewis
7/29	Anne Fason	mellissa.fason@icloud.com	97333	Anne Fason
7/29	Carol Hill	clhanson@aol.com	97321	Carol Hill

7/29 FRANK E OLIVER A-401112@comcast.net 97321 Frank E. Oliver

Saving Powers Signatures of Support

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Date	Printed Name	Email or Phone (we will NOT contact you or sell)	Zip Code	Signature
8/1	Kirsten Gleser	kgleser63@gmail.com	97331	
8/1	Mary Willlett	willlett@yahoo.com	97331	
8/1	Isaac Savolin	IsaacSavolin@gmail.com	97333	
8/1	John Flatberg	—	97330	
8/1	Jen Kaskela	jen95maris@gmail.com	97330	
8/1	Anna Odemwald	annaodemwald1@gmail.com	97330	
8/1	Vaughn Myers	Vaughnibowellmyers@gmail.com	97330	
8/1	Holly Shutte	holly.shutte@gmail.com	97333	
8/1	Charles Maughan	Cmaughan@gmail.com	97330	
8/1	Leasa Sanders	leasa.sanders@gmail.com	97330	
8/1	John Jackson	dogjackson85@gmail.com	97333	
8/1	Caitin Jackson	Catjackson09@gmail.com	97333	
8/1	Lynda Sweet	lmsweet@gmail.com	97330	
8/1	Chenn Sweet	—	97330	

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Date	Printed Name	Email or Phone (we will NOT contact you or sell)	Zip Code	Signature
7/12/24	Abby Holland	abby.holland.ut@gmail.com	97330	Abby Holland
7/29	Beth Filer Williams	filawilliams@gmail.com	97333	Beth Filer Williams
7/30	Caithleen Clark	541.829.2701	97330	Caithleen Clark
7/30/24	Erica Cooper	541-905-7497	97321	Tanya Thompson
7/31	Sheryl D. Gieseler	Norm G11@gmail.com	97331	Sheryl D. Gieseler
8/1	James Nash	James Nash	97330	James Nash
8/1	Erica Cooper	erachinmike@aol.com	97355	Erica Cooper
8/1	Pam Fulkerson	pamfulkerson.eta@gmail.com	97333	Pam Fulkerson
8/1	Rachel Choquette	choquetherachel@gmail.com	97330	Rachel Choquette
8/1	CHRISTINE DASHIELL	christine.dashielle@gmail.com	97330	Christine Dashielle
8/1	Teresa Heald	theard62@hotmail.com	97330	Teresa Heald
8/1	Kenard Muschovic-Bickner	541-654-3109	97330	Kenard Muschovic-Bickner
8/1	Dawn Dorset	dawndorset@yahoo.com	97330	Dawn Dorset
8/1	Tessa Zuvallos	tessa.zuvallos13@gmail.com	97330	Tessa Zuvallos
8/1	Paul Reilly	Paul R. Reilly		Paul Reilly

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Saving Powers Signatures of Support

Date	Printed Name	Email or Phone (we will NOT contact you or sell)	Zip Code	Signature
7/29	Jeremy Storm	jeremy.storm33@gmail.com	97330	
7/29	Phoenix Starchild	phoenix_starchild@yahoo.com	97333	
7/29	Jessica Finigh	finigh13@yahoo.com	97330	
7/29	Pamela Hawks	pamela.hawks@gmail.com	97371	
7/29	Armando Brown	Armando.Brown@gmail.com	97370	
8/1	Lawrence Holzworth	Lawrence.Holzworth@gmail.com	97330	
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8/1	Doighlas Howard	Doighlas.Howard@gmail.com	97321	
8/1	Mark Clement	mark53clement@gmail.com		
8/1	Kelly Vining	vining9110@gmail.com	97330	
8/1	Kevin Reinko	reinko@qmail.com	97330	
8/1	Susan GS Finkerson	susan.gs.finkerson@gmail.com	97330	
8/1	Emme Bair	em4.leigh@gmail.com	97330	

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protection of land, wildlife, and livability in Benton County's rural areas.

Date	Printed Name	Email or Phone (we will NOT contact you or sell)	Zip Code	Signature
3/1	Kate Emrick Kuykend	—	97320	Kate E.
3/1	Sheldene Rivera	—	97330	Sheldene Rivera
3/1	Carol Cordan	ccordan@sbcbglobal.net	97330	Carol C.
3/1	Anne Taloff	anne4taloff@gmail.com	97321	Anne Taloff
3/1	Mart Taloff	—	—	Mart Taloff
3/1	Diana Inch	arelativpeace@gmail.com	97321	Diana Inch
3/2	Bru Morgan	nebula.lazuli@yahoo.com	97321	Bru Morgan
3/2	Cathy Terry Wexley	cwexley458@yahoo.com	97321	Cathy Wexley
3/2	Karin Post	Zoomskiller@gmail.com	97321	Karin Post
3/2	Karin Helwig	khelwig3@gmail.com	97321	Karin Helwig



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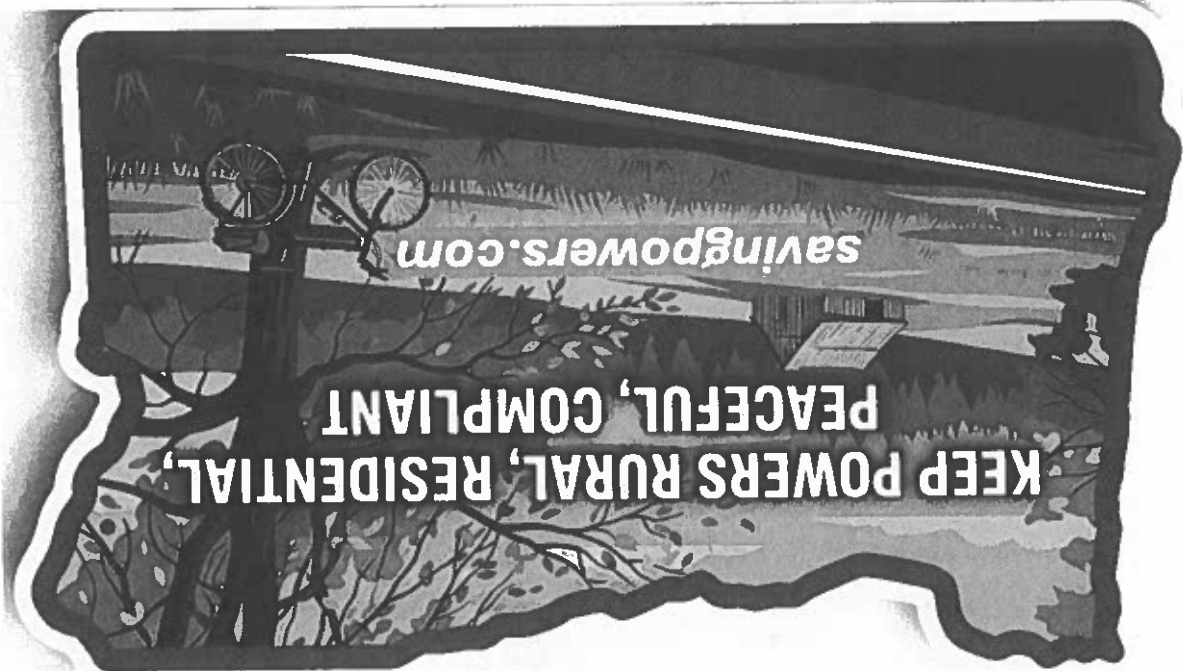
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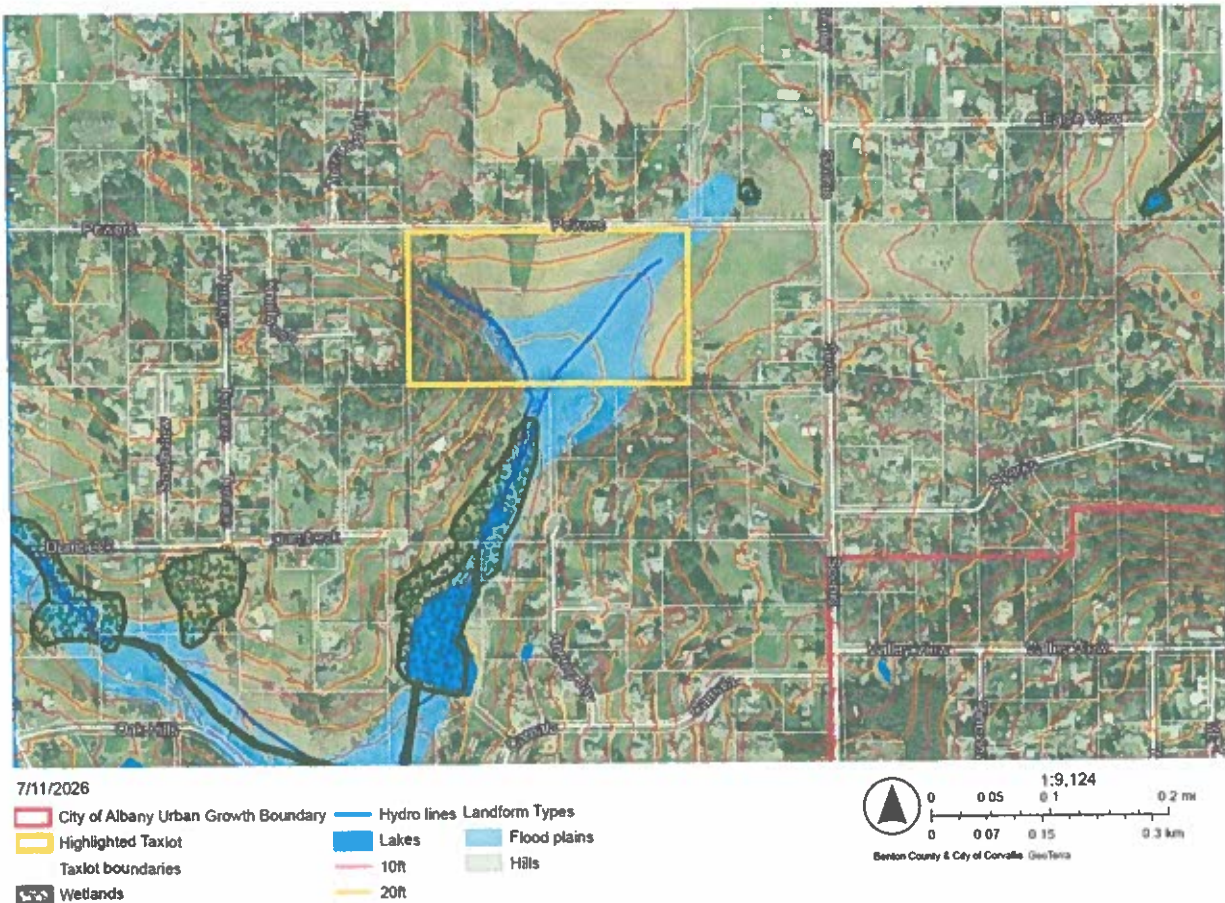
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Figure 1 – Powers Avenue and surrounding area watersheds, tax lots, urban growth boundary.



Data sources: Benton County OR, City of Albany OR, and USGS

Key features -

Note the property in question contains:

- Two USGS and Benton County identified active drainages (hydrolines/streams)
- Is significantly occupied with a USGS identified floodplain
- Is the headwaters, draining to the south into USGS and Benton County identified wetlands and bodies of water, ultimately, draining into the Willamette River watershed.

The property in question falls:

- Outside the City of Albany, Urban Growth boundary (red)
- Within Benton County, OR, rural residential 2 acre zoned district (white property lines)

caryhoffer@hotmail.com

From: Kim Edwards <k.railey@live.com>
Sent: Tuesday, August 4, 2026 9:11 AM
To: Cary Hoffer
Subject: 8/4 speech - final version - Kim Edwards

My name is Kim Edwards. I own a home on Terrace Dr, near the subject property.

I'm here today not only as a neighbor in opposition of the Northside campus, but as a Christian who is lately reflecting on her faith.

The crusade to occupy and ultimately destroy an area that Northside itself called "one of the most beautiful county settings you'll ever see" - an area where they are not wanted - doesn't feel very Christian to me.

Or does it? The Christian Church has a long history of moving in where it wasn't welcome. That is for me to wrestle. You have other things to consider.

Proverbs 26:24 through 26 says:

Enemies disguise themselves with their lips, but in their hearts they harbor deceit.

Though their speech is charming, do not believe them. Their malice may be concealed by deception.

Northside has been deceptive to you about their future plans, and deceitful about their current plans. By their own admission they intend to grow and have lofty goals for the Powers property that far exceed the vague plans they have presented to you.

Northside has demonstrated little respect for neighbors near where they worship. This was evident in a video where they debated whether their 1000 person Trunk or Treat event backing traffic **"way into"** a neighborhood was a good thing or a bad thing. For me, there is no debate there, but Northside clearly places their desires above the rights of their neighbors.

Leviticus 19:18 says:

You shall love thy neighbor as thy self.

Initially, I was worried about traffic. Then, a wedding was held outdoors about the same distance from my home as the Northside property.

From my backyard at 9pm I could hear the crowd, DJ, and the Black Eyed Peas singing about how tonight's gonna be a good night. That provided a whole new perspective on how disruptive Northside's campus will be to my home. As they've stated, with 24/7 access they are excited to entertain indoors and out, at any hour, volume, occupancy, and frequency.

This is no quiet country church.

There have been comparisons made to other area churches: I'd like state how they differ.

St. Anne, Westminster, Calvary, St. Martin, Bellfountain, Suburban, King's Circle, North Albany Community - some are even on RR2 land. However, they are **all on or adjacent to** roads that were designed for high traffic, such as Highland, Circle, and Highway 99 - and they are near

businesses like those that Northside wants to open. For perspective, this property is **3.7 miles** from the nearest store.

Each of those I listed also benefited from established infrastructure, and **none** are of the scale that Northside has proposed.

Commissioners, you have the right to deny this application based on code 53.215, as it will greatly interfere with the character of the area – and it will set dangerous precedent for all RR2 land. I ask you to Save Powers and respect RR2 zoning. We are happy to help you prepare findings in support of denial.

Thank you.

Kim Railey Edwards

Re: LU-25-067: CUP – Church

One of the criteria for granting a conditional use permit under 53.215.1 is that “The proposed use does not seriously interfere with uses on adjacent property, with the character of the area, or with the purpose of the zone.”

My wife and I own the properties immediately adjacent to the west of the applicant's, with “adjacent” being a key word – 683 feet of a shared property line. It's rural and quiet.

What will seriously interfere with the use and character of ours and the neighboring properties? Any noise or sounds that prevents us from enjoying our outdoor living spaces. Any noise or sounds that prevents us from having our windows open at night. Any extraneous light that prevents us from seeing the night sky.

The proposed development is at the bottom of a small valley with higher slopes to the north and south and lesser slopes to east and west. Any noise or sound from this location will be amplified primarily through a combination of physical reflection and atmospheric refraction, commonly known as the “amphitheater effect”. As sound waves travel upward, the slopes act as reflectors, bouncing the sound back and forth across the valley, which prevents the acoustic energy from scattering into the open atmosphere. Furthermore, during stable atmospheric conditions—particularly at night—a temperature inversion often develops, where cold air settles in the valley bottom and warmer air sits above it. This inversion causes the sound waves to bend or refract downward back towards the ground rather than escaping upward, essentially creating a natural waveguide that carries the sound over long distances without significant loss in intensity. This means that those not in the immediate area of the proposed development will be impacted just as much as the nearby neighbors.

Notwithstanding the daily impact daycare and evening programs would create, the applicant's own traffic study expects the development to generate 851 Sunday trips, that is 425 vehicles coming and going with most being concentrated around the applicant's Sunday services. Assuming 180 vehicles, the approximate number counted at this year's 10am Easter service, arriving for service over a 20-minute period works out to 1 vehicle every 6.7 seconds. Stretch that to 30 minutes, it's 1 vehicle every 10 seconds. When the service is over, the same number of vehicles will be competing to leave while idling as they wait their turn to exit. This will be a substantial source of concentrated vehicle noise. The same vehicle noise could be expected for weddings or any special events such as Summer Round Up or Trunk or Treat.

Other sources of noise and sounds must be considered as well. Special events, industrial sized HVAC units, exhaust fans and outdoor activities will not only occur during Sunday services but potentially every day of the week and sometimes 24 hours per day. We along with our neighbors enjoy our quiet time outdoors. The constant drone HVAC units, the music from a wedding reception or the sound from an outdoor event is not enjoyable. The thought of allowing any form of amplified sound, even with exceptions, whether directed to neighboring properties or not is ludicrous – remember this valley is an amphitheater, all will hear.

Widely researched, it has been shown that light pollution causes significant skyglow, obscures celestial views, disrupts nocturnal insect and wildlife behavior, and negatively affects human health. Even with downward-directed and shielded lighting, at the scale this development will require, there will be light pollution. Wet asphalt will reflect light upward and out, and fog will cause significant light scattering. As an avid backyard astronomer, I like a dark sky. It is one of the reasons we moved here.

Approving this conditional use permit risks significant impacts and costs to the tax payers of Benton County while setting a dangerous precedent that puts all rural residential zoned land at risk for untraditional, large-scale uses in the future.

The traffic, facility and event noise along with the light pollution created by this development will seriously interfere with the use and enjoyment of ours and the neighboring properties and will change the rural character of the area. With that I request LU-25-067 conditional use permit, with or without amendments, be denied.

Patrick Gorman
3402 NW Knollwood Dr, Albany, OR

SANDOW ENGINEERING

777 HIGH ST SUITE 320 • EUGENE, OREGON 97401 • 541.513.3376

DATE: August 3, 2026

TO: Benton County Planning Commission

FROM: Kelly Sandow P.E.
Sandow Engineering

RE: LU-25-066 and LU-25-067 Northside Church- Local Trip Study



This memorandum provides the local trip generation study prepared for the proposed Northside Church in Albany, Oregon. The intent of this study is to determine the level of trips generated by local churches with similar operating characteristics and locations to the proposed Northside Church, and the anticipated vehicle trip levels to Powers Ave.

1.0 POWERS AVENUE TRAFFIC VOLUMES

The purpose of the data collection on Powers Ave is to respond to Benton County's request to evaluate the existing traffic levels on Powers Ave.

Average Daily Trips

The Average Daily Trips (ADT) is the average of the total daily trips collected over a typical week (7 days). Sandow Engineering collected daily traffic volumes on Powers Avenue for 7 consecutive days from Wednesday, May 27, 2026, through Tuesday, June 2, 2026. The volumes were collected for a 24-hour time period on each day. The data was collected on typical days while school was in session, and there were no road closures or traffic diversions in the area. Traffic volumes were collected on the west end of Powers Ave, approximately 115 feet from Oak Grove Drive, and on the east end of Powers Avenue along the Northside Church property frontage near the existing driveway to the site. The count data is included in an attachment and summarized in Table 1 below.

TABLE 1: EXISTING DAILY TRIPS

Day	West Side Daily Trips	East Side Daily Trips
May 27, 2026- Wednesday	331	549
May 28, 2026- Thursday	352	499
May 29, 2026- Friday	331	491
May 30, 2026- Saturday	259	580
May 31, 2026- Sunday	249	410
June 1, 2026- Monday	311	540
June 2, 2026- Tuesday	314	522
Average Daily Trips	307	513

The existing Average Daily Trips on Powers Ave is 307 on the west end and 513 on the east end near the church property.

Design Hour Volumes

The Design Hour Volume (DHV) is the peak one-hour traffic volume of the day. The 7-day counts collected by Sandow Engineering were used to determine the average peak hour/DHV over a 7-day period for Powers Ave. Table 2 summarizes the data.

TABLE 2: EXISTING DHV

Day	West Side DHV	East Side DHV
May 27, 2026- Wednesday	41	50
May 28, 2026- Thursday	36	50
May 29, 2026- Friday	39	51
May 30, 2026- Saturday	30	63
May 31, 2026- Sunday	28	45
June 1, 2026- Monday	33	49
June 2, 2026- Tuesday	30	53
Average DHV	34	52

The existing average DHV on Powers Ave is 34 on the west end and 52 on the east end near the church property.

2.0 LOCAL CHURCH TRIP STUDY

The purpose of the local trip study is to provide a local trip rate as suggested by DKS in their letter dated June 9, 2026. This was suggested by DKS since the ITE data has a small sample size.

Generally, the ITE Trip Generation Manuals are used for estimating trip generation levels. The ITE Trip Generation Manual has a land use for churches (560- Church). The ITE data has a small data set for some of the time periods; for example, there is one data point for Sunday ADT using seats as the independent variable, and the data point is for a church with 1,000 seats, and there is only one data point for weekday ADT using the square footage as the independent variable. As per the handbook, local trip data can be used in lieu of the ITE data when the sample size for the land use is small, especially when the independent variable for the limited data is not similar in size to the proposed Northside Church. Therefore, the collection of local data will provide more reliable trip estimates.

A local trip generation study was performed for similar church sites that are similar in size, usage, and location. The study was performed per the ITE Trip Generation Handbook, 3rd ed. To develop a local trip generation rate for this specific land use type, three comparable sites were selected. The sites are all of a similar size, contain similar weekday uses such as weekday bible study, preschools, similar Sunday services, enough parking on site to facilitate all attendees (no off-site parking is needed or used), and are similarly located on more rural roadways on the edge of town. The three sites selected to study were the churches recommended by Benton County in their previous staff report: Calvary Church in Corvallis, Suburban Christian Church in Corvallis, and North Albany Community Church in Albany. Descriptions of each of the study sites are provided below.

2.1 STUDY LOCATIONS

A. CALVARY CORVALLIS

This site is located at 2125 NW Lester Ave in Corvallis, Oregon. The building square footage on this site is approximately 20,000 sf. There is one service held on Sundays at 10:30 AM. Weekday and Saturday activities include weekly bible study classes/groups, weekly prayer groups, open chapels, open pastoral counseling, monthly events, and typical administrative office functions. This site has 2 driveways. All parking is contained on site.



Calvary Corvallis- Corvallis

B. SUBURBAN CHRISTIAN CHURCH

This site is located at 2760 SW 53rd St in Corvallis, Oregon. The building square footage on this site is approximately 39,500 sf. Services are held on Sundays at 9:00 AM and 10:30 AM. Weekday and Saturday activities include weekly bible study classes/groups, weekly prayer groups, open chapels, open pastoral counseling, monthly events, and typical administrative office functions. Additionally, there is a preschool and daycare on site that operates Monday-Friday from 7:30 AM-5:30 PM. This site has 3 driveways. All parking is contained on site.



Suburban Christian Church- Corvallis

C. NORTH ALBANY COMMUNITY CHURCH

This site is located at 1273 NW Thornton Lake Drive in Albany, Oregon. The building square footage on this site is approximately 24,850 sf. One service is held on Sundays at 10:00 AM. Weekday and Saturday activities include weekly bible study classes/groups, weekly prayer groups, open chapels, open pastoral counseling, monthly events, and typical administrative office functions. Additionally, there is a preschool on site that offers services Mondays, Wednesdays, and Fridays. This site has 2 driveways. All parking is contained on site.



North Albany Community Church- Albany

2.2 TRIP GENERATION CALCULATION

This Trip Generation study is performed in accordance with the methodology within the ITE Trip Generation Manual. To establish a local trip generation rate, each of the site's vehicle trips entering and exiting were collected to establish the following data:

- Weekday Average Daily Trips
- Weekday Peak Hour/DHV
- Saturday Average Daily Trips
- Saturday Peak Hour/DHV
- Sunday Average Daily Trips
- Sunday Peak Hour/DHV

As per the ITE Manuals, the appropriate days for collecting weekday trips are on Tuesday, Wednesday, or Thursday. For this study, 24-hour driveway counts were collected at each of

the church driveways on Tuesday July 21, 2026, Wednesday July 22, 2026, and Thursday July 23, 2026. Each site had a total of 3 weekdays collected. This data is used to determine the weekday Average Daily Trip rate and the weekday peak hour trip rate/DHV.

24-hour counts were also collected on Saturday July 25, 2026, and Sunday July 26, 2026. This data is used to determine the Saturday ADT and peak hour trip rate, and the Sunday ADT and peak hour trip rate.

The counts are provided as an attachment. The trips entering and exiting were evaluated at each site to determine the weighted average rate of trips/thousand square feet (ksf) over all three sites for the ADTs and peak hours.

Average Daily Trips

Table 3 provides a summary of the average daily trip results.

TABLE 3: LOCAL CHURCH ADT

Location	Day of Week	Size (ksf)	ADT	Trip Rate (trips/ksf)
Weekday				
Calvary	Tuesday	20.0	372	18.60
	Wednesday	20.0	333	16.60
	Thursday	20.0	72	3.60
Suburban	Tuesday	39.5	212	5.37
	Wednesday	39.5	280	7.09
	Thursday	39.5	220	5.57
North Albany	Tuesday	24.85	56	2.25
	Wednesday	24.85	52	2.09
	Thursday	24.85	68	2.74
Weighted Average Weekday				6.58
Saturday				
Calvary	Saturday	20.0	102	5.10
Suburban	Saturday	39.5	40	1.01
North Albany	Saturday	24.85	92	3.70
Weighted Average Saturday				2.80
Sunday				
Calvary	Sunday	20.0	808	40.40
Suburban	Sunday	39.5	544	13.77
North Albany	Sunday	24.85	266	10.70
Weighted Average Sunday				19.20

ksf=thousand square feet

The analysis finds that the trips per ksf for all three local sites were consistent, ranging from 2.09-18.06 trips/ksf for the weekday ADT, 1.01-5.10/ksf for the Saturday ADT, and 10.70-40.40 trips/ksf for the Sunday ADT. The weighted average rate for this specific land use is found to be 6.58 trips/ksf for the weekday ADT, 2.8 trips/ksf for the Saturday ADT, and 19.20 trips/ksf for the Sunday ADT.

Peak Hour

Table 4 below summarizes the peak hour volumes collected at each site. The data represents the highest one-hour traffic volume for each day, representing the Design Hour Volumes (DHV).

TABLE 4: LOCAL CHURCH PEAK HOUR/DHV

Location	Day of Week	Size (ksf)	DHV	Trip Rate (trips/ksf)
Weekday				
Calvary	Tuesday	20.0	112	5.60
	Wednesday	20.0	113	5.65
	Thursday	20.0	13	0.65
Suburban	Tuesday	39.5	32	0.81
	Wednesday	39.5	45	1.14
	Thursday	39.5	37	0.94
North Albany	Tuesday	24.85	12	0.48
	Wednesday	24.85	14	0.56
	Thursday	24.85	11	0.44
Weighted Average Weekday				1.54
Saturday				
Calvary	Saturday	20.0	28	1.40
Suburban	Saturday	39.5	7	0.18
North Albany	Saturday	24.85	14	0.56
Weighted Average Saturday				0.60
Sunday				
Calvary	Sunday	20	280	14.0
Suburban	Sunday	39.5	203	5.14
North Albany	Sunday	24.85	106	4.27
Weighted Average Sunday				7.0

The analysis finds that the trips per ksf for all three local sites were consistent, ranging from 0.44-5.65 trips/ksf for the weekday DHV, 0.18-1.40/ksf for the Saturday DHV, and 4.27-14.0 trips/ksf for the Sunday DHV. The weighted average rate for this specific land use is found to

be 1.54 trips/ksf for the weekday DHV, 0.60 trips/ksf for the Saturday DHV, and 7.0 trips/ksf for the Sunday DHV.

2.3 APPLICATION OF TRIP RATE TO NORTHSIDE CHURCH

The local trip rate is then applied to the proposed Northside Church total square footage to calculate the trips generated by Northside Church. The trips are provided in Table 5 for the ADT and Table 6 for the DHV.

TABLE 5: NORTHSIDE CHURCH ADT

Day	Rate Trips/ksf	Trips
Weekday	6.58	124
Saturday	2.8	53
Sunday	19.2	363

TABLE 6: NORTHSIDE CHURCH DHV

Day	Rate Trips/ksf	Trips
Weekday	1.54	29
Saturday	0.60	11
Sunday	7.0	132

Using the local trip rate, the ADT for Northside Church is estimated at 124 for the weekday, 53 for Saturday, and 363 for Sunday.

Using the local trip rate, the DHV for Northside Church is estimated at 29 for the weekday, 11 for Saturday, and 132 for Sunday.

3.0 TOTAL TRIPS

The trips generated by the Northside Church are added to the existing Powers Avenue traffic Volumes to determine total volumes with the church. The directional distribution of the church trips is estimated at 25% to/from the west and 75% to/from the east, consistent with regional travel patterns and the roadway network.

Based on these assumptions, the total projected traffic volumes on Powers Avenue are illustrated in Table 7 for the ADT and Table 8 for the DHV.

TABLE 7: AVERAGE DAILY TRIPS WITH NORTHSIDE CHURCH

Day	West Side			East Side		
	Existing	Site Trips	Total	Existing	Site Trips	Total
Monday	311	31	342	540	93	633
Tuesday	314	31	345	522	93	615
Wednesday	331	31	362	549	93	642
Thursday	352	31	383	499	93	592
Friday	331	31	362	491	93	584
Saturday	259	13	272	580	40	620
Sunday	249	91	340	410	272	682
Average Daily Trips			344			624

TABLE 8: DHV WITH NORTHSIDE CHURCH

Day	West Side			East Side		
	Existing	Site Trips	Total	Existing	Site Trips	Total
Monday	33	7	40	49	22	71
Tuesday	30	7	37	53	22	75
Wednesday	41	7	48	50	22	72
Thursday	36	7	43	50	22	72
Friday	39	7	46	51	22	73
Saturday	30	3	33	63	9	72
Sunday	28	33	61	45	99	144
Average DHV			44			83

With the construction of Northside Church, the traffic volumes remain below the 700 ADT threshold identified in the TSP for Primary Local Roads. The roadway will continue to operate within the intended volume range for its functional classification.

The DHV for Powers Ave after completion of the church is estimated at 44 DHV for the west side and 83 DHV for the east side. The typical daily peak-hour volumes are well below the 100 vehicles per hour threshold identified in the TSP for this roadway classification and are consistent with low-volume rural roadway operations.

4.0 CONCLUSION

The additional traffic data collected for Powers Avenue demonstrates that the roadway currently operates within the volume range anticipated for a Primary Local Road under the Benton County Transportation System Plan. Existing traffic volumes average approximately 307 vehicles per day on the west segment of Powers Avenue and 513 vehicles per day adjacent to the church property. Based on local rates and anticipated travel patterns, traffic volumes with the proposed Northside Church are projected to average approximately 344 vehicles per day and 44 peak hour trips on the west segment and 624 vehicles per day and 83 peak hour trips adjacent to the site. These projected volumes remain below the 700 vehicles per day and 100 peak hour threshold identified in the TSP for a Primary Local Road. The roadway continues to operate within the design hour volume range identified for this roadway classification.

POWERS AVENUE DATA COLLECTION

Powers Road West End

Daily Trips			Church		Total	
W	331	307 Total	32	363	365 Total	
Th	352	254 Weekend	32	384	377 Weekend	
F	331	328 Weekday	32	363	360 Weekday	
St	259		32	291		
Su	249		213	462		
M	311		32	343		
Tu	314		32	346		
			58	365		
DHW			Church		Total	
W	41	34 Total	3	44	49 Total	
Th	36	29 Weekend	3	39	75 Weekend	
F	39	36 Weekday	3	42	39 Weekday	
St	30		3	33		
Su	28		89	116		
M	33		3	36		
Tu	30		3	33		
			15	49		

5/27/2026				5/28/2026			
WB Volumes EB Volumes			331	WB Volumes EB Volumes			352
0:00	0	1		0:00	0	0	
0:15	0	0		0:15	0	0	
0:30	2	0		0:30	0	1	
0:45	0	0	3	0:45	0	0	1
1:00	0	0	2	1:00	0	0	1
1:15	0	0	2	1:15	0	0	1
1:30	0	0	0	1:30	0	0	0
1:45	0	0	0	1:45	0	0	0
2:00	0	0	0	2:00	0	0	0
2:15	0	0	0	2:15	0	0	0
2:30	0	0	0	2:30	0	0	0
2:45	0	0	0	2:45	0	0	0
3:00	0	0	0	3:00	1	1	2
3:15	2	0	2	3:15	2	0	4
3:30	0	0	2	3:30	0	0	4
3:45	0	0	2	3:45	0	0	4
4:00	0	0	2	4:00	0	0	2
4:15	0	1	1	4:15	0	1	1
4:30	0	0	1	4:30	0	0	1
4:45	0	0	1	4:45	0	0	1
5:00	0	1	2	5:00	0	0	1
5:15	1	0	2	5:15	0	0	0
5:30	0	1	3	5:30	0	1	1
5:45	2	1	6	5:45	1	1	3
6:00	0	0	5	6:00	0	1	4
6:15	3	0	7	6:15	2	2	8
6:30	5	1	12	6:30	6	4	17
6:45	1	5	15	6:45	4	1	20
7:00	1	0	18	7:00	3	3	25
7:15	7	1	21	7:15	1	4	26
7:30	4	6	25	7:30	14	2	32
7:45	1	3	23	7:45	6	2	35
8:00	0	1	23	8:00	2	3	34
8:15	5	3	23	8:15	2	1	32
8:30	1	2	16	8:30	0	5	21
8:45	2	10	24	8:45	2	3	18
9:00	2	0	25	9:00	2	2	17
9:15	2	0	19	9:15	3	1	18
9:30	2	0	18	9:30	1	4	18
9:45	1	1	8	9:45	2	0	15
10:00	3	1	10	10:00	5	6	22
10:15	2	2	12	10:15	3	4	25
10:30	2	1	13	10:30	6	2	28
10:45	1	0	12	10:45	4	1	31
11:00	2	2	12	11:00	4	3	27
11:15	2	1	11	11:15	1	2	23
11:30	1	1	10	11:30	5	5	25
11:45	0	2	11	11:45	1	3	24
12:00	0	1	8	12:00	2	4	23
12:15	3	4	12	12:15	1	2	23
12:30	1	2	13	12:30	2	2	17
12:45	6	0	17	12:45	2	1	16
13:00	2	4	22	13:00	3	4	17
13:15	3	4	22	13:15	1	3	18
13:30	3	3	25	13:30	1	4	19
13:45	1	2	22	13:45	0	4	20
14:00	1	1	18	14:00	3	3	19
14:15	2	3	18	14:15	1	2	18
14:30	9	5	24	14:30	1	7	21
14:45	0	1	22	14:45	3	3	23
15:00	3	2	25	15:00	5	3	25
15:15	2	3	25	15:15	4	6	32
15:30	9	3	23	15:30	3	7	34
15:45	6	7	35	15:45	2	6	36
16:00	7	2	38	16:00	2	4	34
16:15	3	4	41	16:15	1	4	29
16:30	6	1	36	16:30	4	6	29
16:45	3	1	27	16:45	5	2	28
17:00	3	4	25	17:00	2	4	28
17:15	4	2	24	17:15	3	3	29
17:30	2	3	22	17:30	4	2	25
17:45	2	5	25	17:45	3	5	26
18:00	1	6	25	18:00	0	0	20
18:15	6	1	26	18:15	4	4	22
18:30	3	2	26	18:30	5	4	25
18:45	3	3	25	18:45	3	2	22
19:00	3	4	25	19:00	1	3	26
19:15	0	3	21	19:15	1	1	20
19:30	2	1	19	19:30	0	2	13
19:45	3	4	20	19:45	2	1	11
20:00	0	6	19	20:00	0	2	9
20:15	3	5	24	20:15	1	1	9
20:30	0	3	24	20:30	0	2	9
20:45	1	0	18	20:45	3	0	9
21:00	0	2	14	21:00	0	0	7
21:15	0	2	8	21:15	1	2	8
21:30	3	0	8	21:30	0	1	7
21:45	2	4	13	21:45	0	0	4
22:00	0	0	11	22:00	0	0	4
22:15	0	0	9	22:15	2	1	4
22:30	0	0	6	22:30	0	0	3
22:45	0	2	2	22:45	2	0	5
23:00	0	0	2	23:00	0	0	5
23:15	0	0	2	23:15	0	0	2
23:30	0	0	2	23:30	0	0	2
23:45	0	0	0	23:45	0	0	0
total	168	163		total	166	186	
DHV			41	DHV			36

5/29/2026				5/30/2026			
WB Volumes		EB Volumes		WB Volumes		EB Volumes	
0:00	1	0		0:00	0	0	
0:15	0	0		0:15	0	0	
0:30	0	0		0:30	0	0	
0:45	0	0	1	0:45	0	0	0
1:00	0	0	0	1:00	0	0	0
1:15	0	0	0	1:15	0	0	0
1:30	0	0	0	1:30	0	0	0
1:45	0	0	0	1:45	0	0	0
2:00	0	0	0	2:00	0	0	0
2:15	0	0	0	2:15	0	0	0
2:30	0	0	0	2:30	0	0	0
2:45	0	0	0	2:45	0	0	0
3:00	0	0	0	3:00	1	0	1
3:15	2	0	2	3:15	2	0	3
3:30	0	0	2	3:30	0	0	3
3:45	0	0	2	3:45	0	2	5
4:00	0	0	2	4:00	0	1	5
4:15	0	0	0	4:15	0	0	3
4:30	0	0	0	4:30	0	0	3
4:45	0	1	1	4:45	0	0	1
5:00	0	0	1	5:00	0	0	0
5:15	0	0	1	5:15	0	0	0
5:30	1	3	5	5:30	0	0	0
5:45	1	0	5	5:45	0	0	0
6:00	1	0	8	6:00	1	0	1
6:15	1	0	7	6:15	0	0	1
6:30	3	2	8	6:30	0	0	1
6:45	2	0	8	6:45	0	0	1
7:00	1	4	13	7:00	3	2	5
7:15	2	6	20	7:15	1	5	11
7:30	8	1	24	7:30	1	2	14
7:45	3	4	29	7:45	0	2	16
8:00	1	3	28	8:00	1	0	12
8:15	0	3	23	8:15	1	3	10
8:30	0	2	16	8:30	1	0	8
8:45	1	3	13	8:45	4	1	11
9:00	2	0	11	9:00	1	4	15
9:15	0	0	8	9:15	1	2	14
9:30	2	2	10	9:30	1	1	15
9:45	2	0	8	9:45	1	0	11
10:00	1	1	8	10:00	1	1	8
10:15	1	2	11	10:15	3	3	11
10:30	7	1	15	10:30	0	3	12
10:45	2	5	20	10:45	2	3	16
11:00	0	1	19	11:00	2	8	24
11:15	4	4	24	11:15	2	4	24
11:30	3	3	22	11:30	0	3	24
11:45	2	2	19	11:45	1	1	21
12:00	1	5	24	12:00	1	4	16
12:15	0	0	16	12:15	1	1	12
12:30	2	4	16	12:30	1	1	11
12:45	1	2	15	12:45	4	1	14
13:00	4	5	18	13:00	2	0	11
13:15	8	3	27	13:15	5	1	15
13:30	1	1	23	13:30	4	2	19
13:45	2	1	23	13:45	1	3	18
14:00	1	1	16	14:00	2	2	20
14:15	2	3	12	14:15	0	0	14
14:30	1	3	14	14:30	2	5	15
14:45	1	2	14	14:45	3	2	16
15:00	2	3	17	15:00	2	1	15
15:15	5	3	20	15:15	2	4	21
15:30	3	3	22	15:30	3	0	17
15:45	3	6	28	15:45	3	4	19
16:00	4	8	35	16:00	1	3	20
16:15	0	8	35	16:15	2	1	17
16:30	5	4	38	16:30	2	2	18
16:45	4	6	39	16:45	3	8	22
17:00	0	6	33	17:00	1	7	26
17:15	1	5	31	17:15	3	4	30
17:30	2	5	29	17:30	0	2	28
17:45	1	1	21	17:45	1	3	21
18:00	3	1	19	18:00	1	3	17
18:15	1	2	16	18:15	2	0	12
18:30	4	3	16	18:30	2	1	13
18:45	4	5	23	18:45	1	2	12
19:00	1	1	21	19:00	1	2	11
19:15	0	4	22	19:15	4	2	15
19:30	3	2	20	19:30	0	2	14
19:45	5	1	17	19:45	5	1	17
20:00	2	2	19	20:00	4	1	19
20:15	2	7	24	20:15	1	0	14
20:30	1	4	24	20:30	2	0	14
20:45	0	2	20	20:45	2	1	11
21:00	1	3	20	21:00	1	2	9
21:15	1	0	12	21:15	0	3	11
21:30	0	4	11	21:30	6	1	16
21:45	0	1	10	21:45	0	1	14
22:00	2	3	11	22:00	0	4	15
22:15	0	2	12	22:15	5	1	18
22:30	0	0	8	22:30	1	0	12
22:45	0	0	7	22:45	0	1	12
23:00	1	0	3	23:00	1	0	9
23:15	0	2	3	23:15	0	0	3
23:30	0	1	4	23:30	0	0	2
23:45	0	3	7	23:45	0	0	1
Total	137	194	39	Total	119	140	30
DHV				DHV			

5/31/2026	249	6/1/2026	311
WB Volume EB Volumes		WB Volume EB Volumes	
0:00	0	0	0
0:15	0	0	0
0:30	0	0	0
0:45	0	0	1
1:00	0	0	1
1:15	0	0	1
1:30	0	0	0
1:45	0	0	0
2:00	1	0	0
2:15	0	2	2
2:30	0	0	2
2:45	0	0	2
3:00	1	0	2
3:15	0	2	2
3:30	0	0	2
3:45	0	0	2
4:00	0	0	2
4:15	0	0	0
4:30	0	1	1
4:45	0	0	1
5:00	0	0	1
5:15	0	0	1
5:30	0	1	2
5:45	0	2	4
6:00	0	3	9
6:15	1	3	12
6:30	0	2	12
6:45	0	4	14
7:00	0	7	19
7:15	1	3	22
7:30	0	5	31
7:45	2	3	32
8:00	6	4	27
8:15	3	2	23
8:30	0	1	15
8:45	2	5	18
9:00	2	3	17
9:15	3	1	16
9:30	3	1	15
9:45	4	1	9
10:00	3	2	8
10:15	3	1	10
10:30	2	0	8
10:45	1	3	10
11:00	2	2	10
11:15	2	3	12
11:30	3	3	16
11:45	1	4	17
12:00	4	1	15
12:15	2	4	15
12:30	2	2	17
12:45	2	5	19
13:00	0	4	25
13:15	2	4	26
13:30	1	3	25
13:45	2	5	26
14:00	1	5	26
14:15	1	4	27
14:30	3	1	27
14:45	0	4	29
15:00	2	3	28
15:15	4	6	31
15:30	0	3	33
15:45	2	4	29
16:00	3	6	30
16:15	9	6	29
16:30	1	8	32
16:45	2	0	28
17:00	2	4	28
17:15	0	4	25
17:30	2	4	21
17:45	1	2	23
18:00	2	1	20
18:15	1	3	17
18:30	0	1	14
18:45	4	5	15
19:00	0	0	11
19:15	2	1	11
19:30	3	4	12
19:45	0	1	8
20:00	2	3	11
20:15	1	0	9
20:30	0	1	8
20:45	0	6	15
21:00	0	1	13
21:15	1	2	14
21:30	0	0	11
21:45	0	2	5
22:00	0	0	4
22:15	0	2	4
22:30	0	0	4
22:45	0	0	2
23:00	0	0	2
23:15	0	0	0
23:30	0	2	2
23:45	0	0	2
TOTAL	139	147	164
DHV	28		33

6/2/2026

314

WB Volum EB Volumes

0:00	2	0	
0:15	0	0	
0:30	0	0	
0:45	0	0	2
1:00	0	0	0
1:15	0	0	0
1:30	0	0	0
1:45	0	0	0
2:00	0	0	0
2:15	0	0	0
2:30	0	0	0
2:45	0	0	0
3:00	0	0	0
3:15	2	0	2
3:30	0	0	2
3:45	0	0	2
4:00	0	0	2
4:15	0	1	1
4:30	0	0	1
4:45	0	0	1
5:00	0	1	2
5:15	1	1	3
5:30	2	1	6
5:45	1	0	7
6:00	1	0	7
6:15	3	1	9
6:30	2	2	10
6:45	4	1	14
7:00	4	4	21
7:15	1	2	20
7:30	5	1	22
7:45	1	1	19
8:00	0	0	11
8:15	2	2	12
8:30	2	2	10
8:45	4	4	16
9:00	1	8	25
9:15	3	2	26
9:30	2	0	24
9:45	2	2	20
10:00	5	0	16
10:15	4	4	19
10:30	4	3	24
10:45	0	4	24
11:00	4	5	28
11:15	4	2	26
11:30	1	1	21
11:45	2	3	22
12:00	2	4	19
12:15	2	0	15
12:30	2	4	19
12:45	6	5	25
13:00	4	0	23
13:15	2	3	26
13:30	3	3	26
13:45	1	4	20
14:00	0	2	18
14:15	2	1	16
14:30	0	0	10
14:45	4	6	15
15:00	2	2	17
15:15	3	2	19
15:30	4	7	30
15:45	1	5	26
16:00	4	3	29
16:15	2	4	30
16:30	0	2	21
16:45	4	2	21
17:00	1	4	19
17:15	4	4	21
17:30	2	3	24
17:45	3	4	25
18:00	2	3	25
18:15	2	2	21
18:30	2	2	20
18:45	0	3	16
19:00	1	2	14
19:15	2	1	13
19:30	0	1	10
19:45	2	5	14
20:00	4	2	17
20:15	1	2	17
20:30	0	3	19
20:45	1	0	13
21:00	0	2	9
21:15	0	3	9
21:30	0	1	7
21:45	0	0	6
22:00	2	0	6
22:15	2	2	7
22:30	0	0	6
22:45	0	0	6
23:00	0	0	4
23:15	0	0	0
23:30	0	0	0
23:45	0	0	0

Total	148	166	
DHV			30

Powers Road East End

Daily Trips			Church		Total	
W	549	513 Total	96	645	606 Total	
Th	499	495 Weekend	96	595	862 Weekend	
F	491	520 Weekday	96	587	616 Weekday	
SA	580		96	676		
Su	410		638	1048		
M	540		96	636		
Tu	522		96	618		
			173			
Driv			Church		Total	
W	50	52 Total	8	58	96 Total	
Th	50	54 Weekend	8	58	190 Weekend	
F	51	51 Weekday	8	59	59 Weekday	
Sl	63		8	71		
Su	45		263	308		
M	49		8	57		
Tu	53		8	61		
			44	96		

W	5/27/2026		549
	WB Volumes	EB Volumes	
0:00	0	0	
0:15	0	1	
0:30	1	0	
0:45	2	0	4
1:00	0	0	4
1:15	0	0	3
1:30	0	0	2
1:45	0	0	0
2:00	0	0	0
2:15	0	0	0
2:30	0	0	0
2:45	0	0	0
3:00	0	0	0
3:15	0	0	0
3:30	0	0	0
3:45	0	0	0
4:00	0	0	0
4:15	0	1	1
4:30	0	1	2
4:45	0	0	2
5:00	0	2	4
5:15	1	2	6
5:30	0	4	9
5:45	1	1	11
6:00	1	1	11
6:15	2	0	10
6:30	1	3	10
6:45	0	3	11
7:00	2	6	17
7:15	2	5	22
7:30	1	6	25
7:45	0	6	28
8:00	0	5	25
8:15	5	1	24
8:30	2	3	22
8:45	1	8	25
9:00	5	7	32
9:15	6	2	34
9:30	4	5	38
9:45	3	1	33
10:00	4	3	28
10:15	5	3	28
10:30	1	6	26
10:45	5	3	30
11:00	4	6	33
11:15	6	5	36
11:30	3	4	36
11:45	1	2	31
12:00	4	8	33
12:15	3	3	28
12:30	7	4	32
12:45	9	1	39
13:00	4	8	39
13:15	6	4	43
13:30	5	10	47
13:45	7	3	47
14:00	6	1	42
14:15	7	6	45
14:30	9	7	46
14:45	3	3	42
15:00	5	7	47
15:15	8	8	50
15:30	6	2	42
15:45	2	4	42
16:00	4	4	38
16:15	6	2	30
16:30	7	5	34
16:45	8	2	38
17:00	3	6	39
17:15	7	3	41
17:30	7	4	40
17:45	6	3	39
18:00	6	6	42
18:15	6	6	44
18:30	5	5	43
18:45	5	3	42
19:00	3	3	36
19:15	4	1	29
19:30	7	8	34
19:45	4	5	35
20:00	2	3	34
20:15	1	1	31
20:30	7	3	26
20:45	2	0	19
21:00	1	4	19
21:15	2	3	22
21:30	7	2	21
21:45	2	2	23
22:00	0	1	19
22:15	0	0	14
22:30	0	0	5
22:45	1	3	5
23:00	0	0	4
23:15	0	0	4
23:30	3	0	7
23:45	0	0	3
total DHV	278	273	50

	5/28/2026		499
	WB Volumes	EB Volumes	
0:00	0	0	
0:15	0	0	
0:30	1	0	
0:45	2	0	3
1:00	0	0	3
1:15	0	0	3
1:30	0	0	2
1:45	0	0	0
2:00	0	0	0
2:15	0	0	0
2:30	0	0	0
2:45	0	0	0
3:00	0	1	1
3:15	0	0	1
3:30	0	0	1
3:45	0	0	1
4:00	0	0	0
4:15	0	1	1
4:30	0	3	4
4:45	0	1	5
5:00	0	1	6
5:15	0	0	5
5:30	0	0	2
5:45	0	1	2
6:00	0	1	2
6:15	1	4	7
6:30	2	1	10
6:45	2	3	14
7:00	1	7	21
7:15	1	6	23
7:30	6	3	29
7:45	5	6	35
8:00	3	4	34
8:15	3	1	31
8:30	1	5	28
8:45	2	3	22
9:00	2	3	20
9:15	4	4	24
9:30	5	4	27
9:45	3	4	29
10:00	0	4	28
10:15	6	7	33
10:30	3	9	36
10:45	4	2	35
11:00	4	3	38
11:15	6	4	35
11:30	5	4	32
11:45	2	4	32
12:00	1	5	31
12:15	4	8	33
12:30	5	3	32
12:45	6	3	35
13:00	8	4	41
13:15	6	4	39
13:30	4	9	44
13:45	1	5	41
14:00	4	2	35
14:15	1	4	30
14:30	5	4	26
14:45	5	6	31
15:00	5	2	32
15:15	6	7	40
15:30	3	12	46
15:45	3	6	44
16:00	7	6	50
16:15	7	5	49
16:30	6	5	45
16:45	5	2	43
17:00	7	5	42
17:15	9	5	44
17:30	5	6	44
17:45	2	3	42
18:00	0	4	34
18:15	7	2	29
18:30	4	4	26
18:45	5	3	29
19:00	1	2	28
19:15	2	3	24
19:30	4	1	21
19:45	4	1	18
20:00	2	3	20
20:15	4	2	21
20:30	3	2	21
20:45	7	0	23
21:00	0	1	19
21:15	1	2	16
21:30	0	0	11
21:45	0	1	5
22:00	0	0	4
22:15	4	2	7
22:30	0	0	7
22:45	1	0	7
23:00	1	1	9
23:15	0	0	3
23:30	0	0	3
23:45	1	0	3
total DHV	240	259	50

5/29/2026				5/30/2026			
491				580			
WB Volume EB Volumes				WB Volume EB Volumes			
0:00	0	0		0:00	0	0	
0:15	0	0		0:15	0	0	
0:30	2	0		0:30	0	0	
0:45	0	0	2	0:45	0	0	0
1:00	0	0	2	1:00	0	0	0
1:15	0	0	2	1:15	0	0	0
1:30	0	0	0	1:30	1	1	2
1:45	0	0	0	1:45	0	0	2
2:00	0	0	0	2:00	0	0	2
2:15	0	0	0	2:15	0	0	2
2:30	0	0	0	2:30	0	0	0
2:45	0	0	0	2:45	0	0	0
3:00	1	0	1	3:00	1	0	1
3:15	0	0	1	3:15	0	0	1
3:30	0	0	1	3:30	0	0	1
3:45	0	0	1	3:45	0	2	3
4:00	0	0	0	4:00	0	1	3
4:15	0	0	0	4:15	0	0	3
4:30	0	2	2	4:30	1	2	6
4:45	0	1	3	4:45	0	0	4
5:00	0	0	3	5:00	0	0	3
5:15	0	0	3	5:15	0	0	3
5:30	0	1	2	5:30	0	1	1
5:45	0	1	2	5:45	0	1	2
6:00	0	0	2	6:00	1	0	3
6:15	1	1	4	6:15	0	0	3
6:30	2	1	6	6:30	0	0	2
6:45	1	3	9	6:45	1	1	3
7:00	0	8	17	7:00	1	0	3
7:15	2	5	22	7:15	2	4	9
7:30	4	6	29	7:30	0	5	14
7:45	5	6	36	7:45	2	1	15
8:00	3	4	35	8:00	3	4	21
8:15	0	1	29	8:15	2	5	22
8:30	1	1	21	8:30	1	5	23
8:45	2	5	17	8:45	5	6	31
9:00	2	2	14	9:00	3	6	33
9:15	1	2	16	9:15	5	7	38
9:30	4	7	25	9:30	8	7	47
9:45	3	4	25	9:45	4	5	45
10:00	2	2	25	10:00	3	4	43
10:15	4	1	27	10:15	4	4	39
10:30	8	5	29	10:30	5	5	34
10:45	2	6	30	10:45	5	4	34
11:00	0	6	32	11:00	10	9	46
11:15	6	3	36	11:15	5	3	46
11:30	2	6	31	11:30	1	1	38
11:45	2	5	30	11:45	7	7	43
12:00	0	3	27	12:00	4	9	37
12:15	2	1	21	12:15	7	3	39
12:30	4	2	19	12:30	2	8	47
12:45	3	3	18	12:45	4	5	42
13:00	7	7	29	13:00	2	3	34
13:15	9	5	40	13:15	7	4	35
13:30	3	1	40	13:30	4	3	32
13:45	2	1	37	13:45	2	2	27
14:00	1	1	25	14:00	7	6	35
14:15	1	2	14	14:15	0	3	27
14:30	3	5	16	14:30	5	8	33
14:45	4	2	19	14:45	10	8	47
15:00	5	4	26	15:00	2	1	37
15:15	5	2	30	15:15	3	9	46
15:30	6	8	36	15:30	3	3	39
15:45	7	7	44	15:45	2	6	29
16:00	4	6	45	16:00	4	3	33
16:15	3	10	51	16:15	3	2	26
16:30	8	4	49	16:30	8	4	32
16:45	5	3	43	16:45	8	4	36
17:00	1	6	49	17:00	14	12	55
17:15	3	8	39	17:15	10	3	63
17:30	6	6	38	17:30	6	4	61
17:45	3	5	38	17:45	5	6	60
18:00	7	5	43	18:00	10	6	50
18:15	2	4	38	18:15	5	0	42
18:30	7	4	37	18:30	7	4	43
18:45	5	3	37	18:45	4	6	42
19:00	0	1	26	19:00	4	4	34
19:15	3	7	30	19:15	2	8	39
19:30	3	2	24	19:30	4	3	35
19:45	6	2	24	19:45	7	7	39
20:00	5	2	30	20:00	4	3	38
20:15	5	4	29	20:15	3	3	34
20:30	6	4	34	20:30	2	1	30
20:45	2	4	32	20:45	1	8	25
21:00	1	4	30	21:00	5	4	27
21:15	5	3	29	21:15	2	2	25
21:30	0	1	20	21:30	2	2	26
21:45	0	1	15	21:45	3	6	26
22:00	6	4	20	22:00	2	3	22
22:15	0	1	13	22:15	1	3	22
22:30	0	1	13	22:30	2	4	24
22:45	2	3	17	22:45	0	1	16
23:00	0	2	9	23:00	1	1	13
23:15	1	1	10	23:15	1	2	12
23:30	4	2	15	23:30	3	1	19
23:45	0	2	12	23:45	0	0	9
total	227	264		total	278	302	
DHV			51	DHV			63

5/31/2026				410
WB Volume	EB Volume	Volum es		
0:00	0	4		
0:15	0	0		
0:30	0	0		
0:45	2	0	6	
1:00	1	2	5	
1:15	0	0	5	
1:30	0	0	5	
1:45	0	0	3	
2:00	1	0	1	
2:15	0	0	1	
2:30	0	1	2	
2:45	0	0	2	
3:00	1	1	3	
3:15	0	0	3	
3:30	0	0	2	
3:45	0	0	2	
4:00	0	0	0	
4:15	0	0	0	
4:30	0	0	0	
4:45	0	0	0	
5:00	0	0	0	
5:15	0	0	0	
5:30	0	0	0	
5:45	0	1	1	
6:00	1	0	2	
6:15	0	1	3	
6:30	0	0	3	
6:45	0	0	2	
7:00	1	0	2	
7:15	1	1	3	
7:30	0	2	5	
7:45	0	1	6	
8:00	1	7	13	
8:15	2	4	17	
8:30	3	3	21	
8:45	1	3	24	
9:00	0	5	21	
9:15	0	5	20	
9:30	7	5	26	
9:45	1	2	25	
10:00	2	4	26	
10:15	2	8	31	
10:30	4	5	28	
10:45	2	1	28	
11:00	3	4	29	
11:15	1	3	23	
11:30	2	2	18	
11:45	6	9	30	
12:00	4	3	30	
12:15	2	6	34	
12:30	5	6	41	
12:45	4	5	35	
13:00	2	6	36	
13:15	5	6	39	
13:30	5	6	39	
13:45	3	4	37	
14:00	5	3	37	
14:15	5	5	36	
14:30	2	2	29	
14:45	4	3	29	
15:00	2	3	26	
15:15	8	3	27	
15:30	1	3	27	
15:45	6	8	34	
16:00	8	6	43	
16:15	6	5	43	
16:30	2	4	45	
16:45	2	0	33	
17:00	6	2	27	
17:15	5	4	25	
17:30	3	6	28	
17:45	1	3	30	
18:00	4	3	29	
18:15	1	2	23	
18:30	2	4	20	
18:45	5	2	23	
19:00	5	6	27	
19:15	3	2	29	
19:30	3	2	28	
19:45	5	4	30	
20:00	4	1	24	
20:15	2	4	25	
20:30	3	3	26	
20:45	1	0	18	
21:00	0	3	16	
21:15	2	3	15	
21:30	2	0	11	
21:45	0	0	10	
22:00	0	1	8	
22:15	1	0	4	
22:30	0	0	2	
22:45	0	0	2	
23:00	0	0	1	
23:15	0	0	0	
23:30	0	0	0	
23:45	0	0	0	
total	184	226	45	
DHV				

6/1/2026				540
WB Volume	EB Volume	Volum es		
0:00	1	0		
0:15	0	0		
0:30	3	0		
0:45	2	0	6	
1:00	0	0	5	
1:15	0	0	5	
1:30	0	0	2	
1:45	0	0	0	
2:00	0	0	0	
2:15	0	2	2	
2:30	0	0	2	
2:45	0	0	2	
3:00	0	1	3	
3:15	0	0	1	
3:30	0	0	1	
3:45	0	0	1	
4:00	0	0	0	
4:15	1	0	1	
4:30	0	1	2	
4:45	0	0	2	
5:00	2	4	8	
5:15	0	0	7	
5:30	0	2	8	
5:45	2	2	12	
6:00	2	2	10	
6:15	0	0	10	
6:30	0	3	11	
6:45	1	3	11	
7:00	4	4	15	
7:15	5	8	28	
7:30	5	7	37	
7:45	3	4	40	
8:00	0	13	45	
8:15	4	4	40	
8:30	3	3	34	
8:45	5	8	40	
9:00	5	4	36	
9:15	4	4	36	
9:30	3	4	37	
9:45	5	6	35	
10:00	1	2	29	
10:15	5	3	29	
10:30	2	4	28	
10:45	3	0	20	
11:00	3	1	21	
11:15	1	6	20	
11:30	6	5	25	
11:45	4	5	31	
12:00	7	12	46	
12:15	5	5	49	
12:30	2	6	46	
12:45	6	6	49	
13:00	6	3	39	
13:15	9	3	41	
13:30	2	8	43	
13:45	7	4	42	
14:00	5	9	47	
14:15	8	3	46	
14:30	4	6	46	
14:45	4	3	42	
15:00	9	6	43	
15:15	5	5	42	
15:30	7	6	45	
15:45	2	3	43	
16:00	2	9	39	
16:15	8	5	42	
16:30	5	5	39	
16:45	8	2	44	
17:00	9	4	46	
17:15	4	4	41	
17:30	3	12	46	
17:45	4	3	43	
18:00	4	2	36	
18:15	2	4	34	
18:30	3	1	23	
18:45	3	6	25	
19:00	4	0	23	
19:15	3	1	21	
19:30	0	1	18	
19:45	3	3	15	
20:00	3	3	17	
20:15	2	3	18	
20:30	2	0	19	
20:45	0	5	18	
21:00	1	1	14	
21:15	1	1	11	
21:30	0	0	9	
21:45	0	1	5	
22:00	3	1	7	
22:15	0	1	6	
22:30	0	1	7	
22:45	4	2	12	
23:00	0	0	8	
23:15	0	0	7	
23:30	0	1	7	
23:45	0	1	2	
total	254	296	49	
DHV				

6/2/2026

522

WB Volume EB Volumes

0:00	2	0	
0:15	0	0	
0:30	0	0	
0:45	0	0	2
1:00	0	0	0
1:15	0	0	0
1:30	0	0	0
1:45	0	0	0
2:00	0	0	0
2:15	0	0	0
2:30	0	0	0
2:45	0	0	0
3:00	0	0	0
3:15	0	0	0
3:30	0	0	0
3:45	0	0	0
4:00	0	0	0
4:15	0	2	2
4:30	0	0	2
4:45	0	0	2
5:00	0	2	4
5:15	1	1	4
5:30	1	2	7
5:45	0	0	7
6:00	1	1	7
6:15	1	0	6
6:30	1	2	6
6:45	1	4	11
7:00	2	7	18
7:15	0	5	22
7:30	3	8	30
7:45	6	4	35
8:00	2	2	30
8:15	2	2	29
8:30	5	9	32
8:45	3	4	29
9:00	2	4	31
9:15	5	8	40
9:30	3	5	34
9:45	1	5	33
10:00	5	5	37
10:15	6	7	37
10:30	3	2	34
10:45	1	12	41
11:00	5	4	40
11:15	2	3	32
11:30	1	3	31
11:45	4	3	25
12:00	5	5	26
12:15	5	4	30
12:30	4	5	35
12:45	7	8	43
13:00	4	0	37
13:15	5	6	39
13:30	4	5	39
13:45	3	2	29
14:00	0	6	31
14:15	7	3	30
14:30	4	1	26
14:45	8	7	36
15:00	4	4	38
15:15	6	3	37
15:30	6	11	49
15:45	6	5	45
16:00	7	5	46
16:15	6	7	53
16:30	2	2	40
16:45	9	3	41
17:00	6	3	38
17:15	4	0	37
17:30	6	6	47
17:45	3	5	43
18:00	4	7	45
18:15	3	3	39
18:30	4	3	32
18:45	5	5	34
19:00	6	2	31
19:15	1	4	30
19:30	3	3	29
19:45	9	9	37
20:00	8	1	38
20:15	4	2	39
20:30	0	1	34
20:45	0	1	17
21:00	0	1	9
21:15	0	0	3
21:30	1	1	4
21:45	3	0	6
22:00	0	0	5
22:15	1	1	7
22:30	0	0	5
22:45	2	0	4
23:00	0	2	6
23:15	0	0	4
23:30	0	0	4
23:45	0	0	2
total	244	278	
DHV			53

LOCAL CHURCH DATA COLLECTION

Summary of Local Trip Study Data

ADT

	N				C				S		
Tues	28	28	56		186	186	372		106	106	212
Wed	26	26	52		166	166	332		140	140	280
Thurs	34	34	68		36	36	72		110	110	220
Sat	46	46	92		51	51	102		20	20	40
Sun	133	133	266		404	404	808		272	272	544
Weekday	24.85	56	2.25	Sat	24.85	92	3.70	Sun	24.85	266	10.70
	24.85	52	2.09		20.00	102	5.10		20.00	808	40.40
	24.85	68	2.74		39.50	40	1.01		39.50	544	13.77
	20.00	372	18.60	Weighted Average				Weighted Average			
	20.00	332	16.60		84.35	234	2.8		84.35	1818	19.2
	20.00	72	3.60								
	39.50	212	5.37								
	39.50	280	7.09								
	39.50	220	5.57								
Weighted Average											
	253.05	1864	6.58								

Peak Hour

	N				C				S		
Tues			12				112				32
Wed			14				113				45
Thurs			11				13				37
Sat			14				28				7
Sun			106				280				203
Weekday	24.85	12	0.48	Sat	24.85	14	0.56	Sun	24.85	106	4.27
	24.85	14	0.56		20	28	1.40		20	280	14.00
	24.85	11	0.44		39.5	7	0.18		39.5	203	5.14
	20	112	5.60	Weighted Average				Weighted Average			
	20	113	5.65		84.35	49	0.6		84.35	589	7.0
	20	13	0.65								
	39.5	32	0.81								
	39.5	45	1.14								
	39.5	37	0.94								
Weighted Average											
	253.05	389	1.54								

Total Trips on Powers Road with Northside Church

18.9

ADT			0.25	0.75
M	6.58	124	31	93
T	6.58	124	31	93
W	6.58	124	31	93
Th	6.58	124	31	93
F	6.58	124	31	93
S	2.8	53	13	40
S	19.2	363	91	272

DHV			0.25	0.75
M	1.54	29	7	22
T	1.54	29	7	22
W	1.54	29	7	22
Th	1.54	29	7	22
F	1.54	29	7	22
S	0.6	11	3	9
S	7	132	33	99

West

Daily Trips				
M	311	31	342	
Tu	314	31	345	
W	331	31	362	
Th	352	31	383	
F	331	31	362	
Sat	259	13	272	
Su	249	91	340	
	307 Average		344	
DHV				
M	33	7	40	
Tu	30	7	37	
W	41	7	48	
Th	36	7	43	
F	39	7	46	
Sat	30	3	33	
Su	28	33	61	
	34 Average		44	

East

Daily Trips				
M	540	93	633	
Tu	522	93	615	
W	549	93	642	
Th	499	93	592	
F	491	93	584	
Sat	580	40	620	
Su	410	272	682	
	513 Average		624	
DHV				
M	49	22	71	
Tu	53	22	75	
W	50	22	72	
Th	50	22	72	
F	51	22	73	
Sat	63	9	72	
Su	45	99	144	
	52 Average		83	

Calvary Church Trip Data

Weekday Average (Tue / Wed / Thu)

Avg IN	Avg OUT	Avg Total
129	129	259

Time	IN	OUT	Total (IN+OUT)	Peak Hour
5:00 AM - 5:15 AM	0	0	0	
5:15 AM - 5:30 AM	0	0	0	
5:30 AM - 5:45 AM	0	0	0	
5:45 AM - 6:00 AM	0	0	0	0
6:00 AM - 6:15 AM	0	0	0	0
6:15 AM - 6:30 AM	0	0	0	0
6:30 AM - 6:45 AM	2	1	3	3
6:45 AM - 7:00 AM	1	0	1	4
7:00 AM - 7:15 AM	0	0	0	4
7:15 AM - 7:30 AM	1	0	1	5
7:30 AM - 7:45 AM	1	2	3	5
7:45 AM - 8:00 AM	2	0	2	6
8:00 AM - 8:15 AM	6	0	6	12
8:15 AM - 8:30 AM	3	2	5	16
8:30 AM - 8:45 AM	4	0	4	17
8:45 AM - 9:00 AM	8	0	8	23
9:00 AM - 9:15 AM	28	2	30	47
9:15 AM - 9:30 AM	28	0	28	70
9:30 AM - 9:45 AM	23	2	25	91
9:45 AM - 10:00 AM	28	1	29	112
10:00 AM - 10:15 AM	4	1	5	87
10:15 AM - 10:30 AM	6	0	6	65
10:30 AM - 10:45 AM	0	1	1	41
10:45 AM - 11:00 AM	0	0	0	12
11:00 AM - 11:15 AM	3	0	3	10
11:15 AM - 11:30 AM	0	2	2	6
11:30 AM - 11:45 AM	1	2	3	8
11:45 AM - 12:00 PM	0	28	28	36
12:00 PM - 12:15 PM	2	28	30	63
12:15 PM - 12:30 PM	0	23	23	84
12:30 PM - 12:45 PM	1	10	11	92
12:45 PM - 1:00 PM	1	10	11	75
1:00 PM - 1:15 PM	0	5	5	50
1:15 PM - 1:30 PM	2	1	3	30
1:30 PM - 1:45 PM	1	3	4	23
1:45 PM - 2:00 PM	2	2	4	16
2:00 PM - 2:15 PM	0	1	1	12
2:15 PM - 2:30 PM	0	0	0	9
2:30 PM - 2:45 PM	1	1	2	7
2:45 PM - 3:00 PM	0	2	2	5
3:00 PM - 3:15 PM	1	2	3	7
3:15 PM - 3:30 PM	1	6	7	14
3:30 PM - 3:45 PM	1	3	4	16
3:45 PM - 4:00 PM	0	2	2	16
4:00 PM - 4:15 PM	0	2	2	15
4:15 PM - 4:30 PM	0	2	2	10
4:30 PM - 4:45 PM	0	1	1	7
4:45 PM - 5:00 PM	1	4	5	10
5:00 PM - 5:15 PM	1	2	3	11
5:15 PM - 5:30 PM	1	0	1	10
5:30 PM - 5:45 PM	1	3	4	13
5:45 PM - 6:00 PM	3	1	4	12
6:00 PM - 6:15 PM	1	2	3	12
6:15 PM - 6:30 PM	1	4	5	16
6:30 PM - 6:45 PM	12	7	19	31
6:45 PM - 7:00 PM	2	2	4	31
7:00 PM - 7:15 PM	0	2	2	30
7:15 PM - 7:30 PM	0	0	0	25
7:30 PM - 7:45 PM	0	1	1	7
7:45 PM - 8:00 PM	1	1	2	5
8:00 PM - 8:15 PM	0	4	4	7
8:15 PM - 8:30 PM	0	4	4	11
8:30 PM - 8:45 PM	0	1	1	11
8:45 PM - 9:00 PM	0	0	0	9
9:00 PM - 9:15 PM	0	0	0	5
9:15 PM - 9:30 PM	0	0	0	1
9:30 PM - 9:45 PM	0	0	0	0
9:45 PM - 10:00 PM	0	0	0	0
TOTAL (ADT)	186	186	372	112

Wednesday, 7/22/2026			
Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	1	0	1
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	0	0	0
7:00 AM - 7:15 AM	1	2	3
7:15 AM - 7:30 AM	0	0	0
7:30 AM - 7:45 AM	1	2	3
7:45 AM - 8:00 AM	1	0	1
8:00 AM - 8:15 AM	8	0	8
8:15 AM - 8:30 AM	1	0	1
8:30 AM - 8:45 AM	6	1	7
8:45 AM - 9:00 AM	8	2	10
9:00 AM - 9:15 AM	18	0	18
9:15 AM - 9:30 AM	31	0	31
9:30 AM - 9:45 AM	33	1	34
9:45 AM - 10:00 AM	21	1	22
10:00 AM - 10:15 AM	9	2	11
10:15 AM - 10:30 AM	1	0	1
10:30 AM - 10:45 AM	2	1	3
10:45 AM - 11:00 AM	1	2	3
11:00 AM - 11:15 AM	1	0	1
11:15 AM - 11:30 AM	1	3	4
11:30 AM - 11:45 AM	1	2	3
11:45 AM - 12:00 PM	1	34	35
12:00 PM - 12:15 PM	1	34	35
12:15 PM - 12:30 PM	0	29	29
12:30 PM - 12:45 PM	0	14	14
12:45 PM - 1:00 PM	0	4	4
1:00 PM - 1:15 PM	0	2	2
1:15 PM - 1:30 PM	0	1	1
1:30 PM - 1:45 PM	0	0	0
1:45 PM - 2:00 PM	2	1	3
2:00 PM - 2:15 PM	0	1	1
2:15 PM - 2:30 PM	1	4	5
2:30 PM - 2:45 PM	0	1	1
2:45 PM - 3:00 PM	6	0	6
3:00 PM - 3:15 PM	0	4	4
3:15 PM - 3:30 PM	0	2	2
3:30 PM - 3:45 PM	1	5	6
3:45 PM - 4:00 PM	0	1	1
4:00 PM - 4:15 PM	0	0	0
4:15 PM - 4:30 PM	0	0	0
4:30 PM - 4:45 PM	0	0	0
4:45 PM - 5:00 PM	0	0	0
5:00 PM - 5:15 PM	1	1	2
5:15 PM - 5:30 PM	0	5	5
5:30 PM - 5:45 PM	0	0	0
5:45 PM - 6:00 PM	1	0	1
6:00 PM - 6:15 PM	2	0	2
6:15 PM - 6:30 PM	1	2	3
6:30 PM - 6:45 PM	0	0	0
6:45 PM - 7:00 PM	0	0	0
7:00 PM - 7:15 PM	3	1	4
7:15 PM - 7:30 PM	0	1	1
7:30 PM - 7:45 PM	0	0	0
7:45 PM - 8:00 PM	0	0	0
8:00 PM - 8:15 PM	0	0	0
8:15 PM - 8:30 PM	0	0	0
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	166	166	332

Thursday, 7/23/2026			
Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	0	0	0
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	2	0	2
7:00 AM - 7:15 AM	2	0	2
7:15 AM - 7:30 AM	0	0	0
7:30 AM - 7:45 AM	0	1	1
7:45 AM - 8:00 AM	5	0	5
8:00 AM - 8:15 AM	1	0	1
8:15 AM - 8:30 AM	0	2	2
8:30 AM - 8:45 AM	0	0	0
8:45 AM - 9:00 AM	1	0	1
9:00 AM - 9:15 AM	0	1	1
9:15 AM - 9:30 AM	1	0	1
9:30 AM - 9:45 AM	1	0	1
9:45 AM - 10:00 AM	1	2	3
10:00 AM - 10:15 AM	2	1	3
10:15 AM - 10:30 AM	0	0	0
10:30 AM - 10:45 AM	1	6	7
10:45 AM - 11:00 AM	1	0	1
11:00 AM - 11:15 AM	0	0	0
11:15 AM - 11:30 AM	1	1	2
11:30 AM - 11:45 AM	1	2	3
11:45 AM - 12:00 PM	1	1	2
12:00 PM - 12:15 PM	1	0	1
12:15 PM - 12:30 PM	0	0	0
12:30 PM - 12:45 PM	1	1	2
12:45 PM - 1:00 PM	0	2	2
1:00 PM - 1:15 PM	0	0	0
1:15 PM - 1:30 PM	1	0	1
1:30 PM - 1:45 PM	3	4	7
1:45 PM - 2:00 PM	0	0	0
2:00 PM - 2:15 PM	0	1	1
2:15 PM - 2:30 PM	0	0	0
2:30 PM - 2:45 PM	0	1	1
2:45 PM - 3:00 PM	0	0	0
3:00 PM - 3:15 PM	0	0	0
3:15 PM - 3:30 PM	0	2	2
3:30 PM - 3:45 PM	1	0	1
3:45 PM - 4:00 PM	1	0	1
4:00 PM - 4:15 PM	1	0	1
4:15 PM - 4:30 PM	0	1	1
4:30 PM - 4:45 PM	0	0	0
4:45 PM - 5:00 PM	0	0	0
5:00 PM - 5:15 PM	0	0	0
5:15 PM - 5:30 PM	0	0	0
5:30 PM - 5:45 PM	0	0	0
5:45 PM - 6:00 PM	0	0	0
6:00 PM - 6:15 PM	2	1	3
6:15 PM - 6:30 PM	0	0	0
6:30 PM - 6:45 PM	0	2	2
6:45 PM - 7:00 PM	2	0	2
7:00 PM - 7:15 PM	1	0	1
7:15 PM - 7:30 PM	0	0	0
7:30 PM - 7:45 PM	0	0	0
7:45 PM - 8:00 PM	1	2	3
8:00 PM - 8:15 PM	0	1	1
8:15 PM - 8:30 PM	0	1	1
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	36	36	72

0
0
0
0
0
0
0
0
2
4
4
5
8
7
9
8
4
4
3
4
6
13
11
8
10
6
7
8
6
5
5
4
5
10
8
8
2
2
1
0
0
0
0
0
0
3
3
4
5
4
3
2
1
0
0
0
0
3
5
7
5
3
4
4
5
5
2
1
0
0
0
0
13

Saturday, 7/26/2026			
Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	0	0	0
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	0	0	0
7:00 AM - 7:15 AM	0	0	0
7:15 AM - 7:30 AM	0	0	0
7:30 AM - 7:45 AM	0	0	0
7:45 AM - 8:00 AM	0	0	0
8:00 AM - 8:15 AM	0	1	1
8:15 AM - 8:30 AM	1	2	3
8:30 AM - 8:45 AM	0	1	1
8:45 AM - 9:00 AM	1	0	1
9:00 AM - 9:15 AM	0	0	0
9:15 AM - 9:30 AM	1	4	5
9:30 AM - 9:45 AM	1	0	1
9:45 AM - 10:00 AM	0	1	1
10:00 AM - 10:15 AM	2	1	3
10:15 AM - 10:30 AM	0	1	1
10:30 AM - 10:45 AM	0	0	0
10:45 AM - 11:00 AM	3	0	3
11:00 AM - 11:15 AM	0	1	1
11:15 AM - 11:30 AM	0	0	0
11:30 AM - 11:45 AM	0	0	0
11:45 AM - 12:00 PM	0	0	0
12:00 PM - 12:15 PM	0	0	0
12:15 PM - 12:30 PM	0	0	0
12:30 PM - 12:45 PM	0	0	0
12:45 PM - 1:00 PM	1	0	1
1:00 PM - 1:15 PM	0	0	0
1:15 PM - 1:30 PM	1	1	2
1:30 PM - 1:45 PM	0	0	0
1:45 PM - 2:00 PM	0	0	0
2:00 PM - 2:15 PM	0	0	0
2:15 PM - 2:30 PM	2	0	2
2:30 PM - 2:45 PM	0	0	0
2:45 PM - 3:00 PM	0	0	0
3:00 PM - 3:15 PM	0	0	0
3:15 PM - 3:30 PM	1	0	1
3:30 PM - 3:45 PM	0	0	0
3:45 PM - 4:00 PM	2	3	5
4:00 PM - 4:15 PM	0	2	2
4:15 PM - 4:30 PM	0	0	0
4:30 PM - 4:45 PM	0	0	0
4:45 PM - 5:00 PM	0	2	2
5:00 PM - 5:15 PM	1	0	1
5:15 PM - 5:30 PM	0	1	1
5:30 PM - 5:45 PM	0	4	4
5:45 PM - 6:00 PM	1	12	13
6:00 PM - 6:15 PM	1	1	2
6:15 PM - 6:30 PM	0	1	1
6:30 PM - 6:45 PM	1	0	1
6:45 PM - 7:00 PM	0	9	9
7:00 PM - 7:15 PM	3	2	5
7:15 PM - 7:30 PM	1	0	1
7:30 PM - 7:45 PM	2	0	2
7:45 PM - 8:00 PM	8	1	9
8:00 PM - 8:15 PM	10	0	10
8:15 PM - 8:30 PM	7	0	7
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	51	51	102

Sunday, 7/26/2026			
Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	2	0	2
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	3	0	3
7:00 AM - 7:15 AM	3	0	3
7:15 AM - 7:30 AM	3	1	4
7:30 AM - 7:45 AM	4	0	4
7:45 AM - 8:00 AM	6	0	6
8:00 AM - 8:15 AM	6	2	8
8:15 AM - 8:30 AM	4	0	4
8:30 AM - 8:45 AM	6	2	8
8:45 AM - 9:00 AM	16	0	16
9:00 AM - 9:15 AM	10	0	10
9:15 AM - 9:30 AM	14	3	17
9:30 AM - 9:45 AM	20	1	21
9:45 AM - 10:00 AM	31	3	34
10:00 AM - 10:15 AM	68	2	70
10:15 AM - 10:30 AM	118	1	119
10:30 AM - 10:45 AM	54	3	57
10:45 AM - 11:00 AM	12	1	13
11:00 AM - 11:15 AM	4	0	4
11:15 AM - 11:30 AM	2	1	3
11:30 AM - 11:45 AM	3	5	8
11:45 AM - 12:00 PM	1	8	9
12:00 PM - 12:15 PM	2	50	52
12:15 PM - 12:30 PM	1	41	42
12:30 PM - 12:45 PM	1	46	47
12:45 PM - 1:00 PM	1	49	50
1:00 PM - 1:15 PM	2	51	53
1:15 PM - 1:30 PM	1	33	34
1:30 PM - 1:45 PM	0	25	25
1:45 PM - 2:00 PM	0	19	19
2:00 PM - 2:15 PM	1	22	23
2:15 PM - 2:30 PM	0	14	14
2:30 PM - 2:45 PM	0	2	2
2:45 PM - 3:00 PM	0	4	4
3:00 PM - 3:15 PM	0	1	1
3:15 PM - 3:30 PM	1	2	3
3:30 PM - 3:45 PM	0	2	2
3:45 PM - 4:00 PM	0	0	0
4:00 PM - 4:15 PM	0	0	0
4:15 PM - 4:30 PM	0	0	0
4:30 PM - 4:45 PM	1	0	1
4:45 PM - 5:00 PM	0	0	0
5:00 PM - 5:15 PM	1	0	1
5:15 PM - 5:30 PM	0	0	0
5:30 PM - 5:45 PM	0	0	0
5:45 PM - 6:00 PM	0	0	0
6:00 PM - 6:15 PM	0	0	0
6:15 PM - 6:30 PM	0	4	4
6:30 PM - 6:45 PM	1	4	5
6:45 PM - 7:00 PM	0	1	1
7:00 PM - 7:15 PM	0	0	0
7:15 PM - 7:30 PM	1	1	2
7:30 PM - 7:45 PM	0	0	0
7:45 PM - 8:00 PM	0	0	0
8:00 PM - 8:15 PM	0	0	0
8:15 PM - 8:30 PM	0	0	0
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	404	404	808

Suburban Church Trip Data

Weekday Average (Tue / Wed / Thu)

Avg IN	Avg OUT	Avg Total
119	119	237

Tuesday, 7/21/2020				
Time	IN	OUT	Total (IN+OUT)	
5:00 AM - 5:15 AM	0	0	0	
5:15 AM - 5:30 AM	0	0	0	
5:30 AM - 5:45 AM	0	0	0	
5:45 AM - 6:00 AM	0	0	0	0
6:00 AM - 6:15 AM	0	0	0	0
6:15 AM - 6:30 AM	0	0	0	0
6:30 AM - 6:45 AM	0	0	0	0
6:45 AM - 7:00 AM	2	0	2	2
7:00 AM - 7:15 AM	3	1	4	6
7:15 AM - 7:30 AM	3	0	3	9
7:30 AM - 7:45 AM	3	3	6	15
7:45 AM - 8:00 AM	8	4	12	25
8:00 AM - 8:15 AM	1	3	4	25
8:15 AM - 8:30 AM	4	1	5	27
8:30 AM - 8:45 AM	5	3	8	29
8:45 AM - 9:00 AM	3	3	6	23
9:00 AM - 9:15 AM	4	2	6	25
9:15 AM - 9:30 AM	4	1	5	25
9:30 AM - 9:45 AM	3	1	4	21
9:45 AM - 10:00 AM	4	5	9	24
10:00 AM - 10:15 AM	4	1	5	23
10:15 AM - 10:30 AM	0	1	1	19
10:30 AM - 10:45 AM	0	0	0	15
10:45 AM - 11:00 AM	1	2	3	9
11:00 AM - 11:15 AM	1	0	1	5
11:15 AM - 11:30 AM	3	4	7	11
11:30 AM - 11:45 AM	2	3	5	16
11:45 AM - 12:00 PM	1	6	7	20
12:00 PM - 12:15 PM	4	4	8	27
12:15 PM - 12:30 PM	2	3	5	25
12:30 PM - 12:45 PM	1	2	3	23
12:45 PM - 1:00 PM	4	1	5	21
1:00 PM - 1:15 PM	0	1	1	14
1:15 PM - 1:30 PM	5	1	6	15
1:30 PM - 1:45 PM	2	3	5	17
1:45 PM - 2:00 PM	2	1	3	15
2:00 PM - 2:15 PM	1	1	2	16
2:15 PM - 2:30 PM	0	4	4	14
2:30 PM - 2:45 PM	2	2	4	13
2:45 PM - 3:00 PM	2	2	4	14
3:00 PM - 3:15 PM	0	1	1	13
3:15 PM - 3:30 PM	3	4	7	16
3:30 PM - 3:45 PM	4	4	8	20
3:45 PM - 4:00 PM	3	5	8	24
4:00 PM - 4:15 PM	2	7	9	32
4:15 PM - 4:30 PM	1	2	3	28
4:30 PM - 4:45 PM	1	1	2	22
4:45 PM - 5:00 PM	3	2	5	19
5:00 PM - 5:15 PM	2	3	5	15
5:15 PM - 5:30 PM	2	4	6	18
5:30 PM - 5:45 PM	0	3	3	19
5:45 PM - 6:00 PM	1	1	2	16
6:00 PM - 6:15 PM	0	0	0	11
6:15 PM - 6:30 PM	0	0	0	5
6:30 PM - 6:45 PM	0	0	0	2
6:45 PM - 7:00 PM	0	0	0	0
7:00 PM - 7:15 PM	0	0	0	0
7:15 PM - 7:30 PM	0	0	0	0
7:30 PM - 7:45 PM	0	0	0	0
7:45 PM - 8:00 PM	0	0	0	0
8:00 PM - 8:15 PM	0	0	0	0
8:15 PM - 8:30 PM	0	0	0	0
8:30 PM - 8:45 PM	0	0	0	0
8:45 PM - 9:00 PM	0	0	0	0
9:00 PM - 9:15 PM	0	0	0	0
9:15 PM - 9:30 PM	0	0	0	0
9:30 PM - 9:45 PM	0	0	0	0
9:45 PM - 10:00 PM	0	0	0	0
TOTAL (ADT)	106	106	212	32

Wednesday, 7/22/2026			
Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	2	0	2
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	2	0	2
7:00 AM - 7:15 AM	3	1	4
7:15 AM - 7:30 AM	3	0	3
7:30 AM - 7:45 AM	8	8	16
7:45 AM - 8:00 AM	5	4	9
8:00 AM - 8:15 AM	3	2	5
8:15 AM - 8:30 AM	12	3	15
8:30 AM - 8:45 AM	3	4	7
8:45 AM - 9:00 AM	12	4	16
9:00 AM - 9:15 AM	2	5	7
9:15 AM - 9:30 AM	4	1	5
9:30 AM - 9:45 AM	4	1	5
9:45 AM - 10:00 AM	2	3	5
10:00 AM - 10:15 AM	2	1	3
10:15 AM - 10:30 AM	2	1	3
10:30 AM - 10:45 AM	2	5	7
10:45 AM - 11:00 AM	3	3	6
11:00 AM - 11:15 AM	1	1	2
11:15 AM - 11:30 AM	4	10	14
11:30 AM - 11:45 AM	0	1	1
11:45 AM - 12:00 PM	1	1	2
12:00 PM - 12:15 PM	3	1	4
12:15 PM - 12:30 PM	4	4	8
12:30 PM - 12:45 PM	4	2	6
12:45 PM - 1:00 PM	2	4	6
1:00 PM - 1:15 PM	0	1	1
1:15 PM - 1:30 PM	1	2	3
1:30 PM - 1:45 PM	1	0	1
1:45 PM - 2:00 PM	3	1	4
2:00 PM - 2:15 PM	0	3	3
2:15 PM - 2:30 PM	1	4	5
2:30 PM - 2:45 PM	2	3	5
2:45 PM - 3:00 PM	2	1	3
3:00 PM - 3:15 PM	3	5	8
3:15 PM - 3:30 PM	5	6	11
3:30 PM - 3:45 PM	2	8	10
3:45 PM - 4:00 PM	1	3	4
4:00 PM - 4:15 PM	3	4	7
4:15 PM - 4:30 PM	5	4	9
4:30 PM - 4:45 PM	1	2	3
4:45 PM - 5:00 PM	7	1	8
5:00 PM - 5:15 PM	4	6	10
5:15 PM - 5:30 PM	3	3	6
5:30 PM - 5:45 PM	1	5	6
5:45 PM - 6:00 PM	0	0	0
6:00 PM - 6:15 PM	0	0	0
6:15 PM - 6:30 PM	0	7	7
6:30 PM - 6:45 PM	2	1	3
6:45 PM - 7:00 PM	0	0	0
7:00 PM - 7:15 PM	0	0	0
7:15 PM - 7:30 PM	0	0	0
7:30 PM - 7:45 PM	0	0	0
7:45 PM - 8:00 PM	0	0	0
8:00 PM - 8:15 PM	0	0	0
8:15 PM - 8:30 PM	0	0	0
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	140	140	280

Saturday, 7/25/2026			
Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	0	0	0
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	0	0	0
7:00 AM - 7:15 AM	0	0	0
7:15 AM - 7:30 AM	0	0	0
7:30 AM - 7:45 AM	0	0	0
7:45 AM - 8:00 AM	0	0	0
8:00 AM - 8:15 AM	2	0	2
8:15 AM - 8:30 AM	0	1	1
8:30 AM - 8:45 AM	1	1	2
8:45 AM - 9:00 AM	0	0	0
9:00 AM - 9:15 AM	0	0	0
9:15 AM - 9:30 AM	1	1	2
9:30 AM - 9:45 AM	2	1	3
9:45 AM - 10:00 AM	0	0	0
10:00 AM - 10:15 AM	0	0	0
10:15 AM - 10:30 AM	1	1	2
10:30 AM - 10:45 AM	1	2	3
10:45 AM - 11:00 AM	0	0	0
11:00 AM - 11:15 AM	0	0	0
11:15 AM - 11:30 AM	0	0	0
11:30 AM - 11:45 AM	1	0	1
11:45 AM - 12:00 PM	0	1	1
12:00 PM - 12:15 PM	1	1	2
12:15 PM - 12:30 PM	0	0	0
12:30 PM - 12:45 PM	0	0	0
12:45 PM - 1:00 PM	1	1	2
1:00 PM - 1:15 PM	0	0	0
1:15 PM - 1:30 PM	1	1	2
1:30 PM - 1:45 PM	0	1	1
1:45 PM - 2:00 PM	1	1	2
2:00 PM - 2:15 PM	1	1	2
2:15 PM - 2:30 PM	0	0	0
2:30 PM - 2:45 PM	1	1	2
2:45 PM - 3:00 PM	0	0	0
3:00 PM - 3:15 PM	0	0	0
3:15 PM - 3:30 PM	0	0	0
3:30 PM - 3:45 PM	0	0	0
3:45 PM - 4:00 PM	0	0	0
4:00 PM - 4:15 PM	1	1	2
4:15 PM - 4:30 PM	1	1	2
4:30 PM - 4:45 PM	0	0	0
4:45 PM - 5:00 PM	1	0	1
5:00 PM - 5:15 PM	0	0	0
5:15 PM - 5:30 PM	0	1	1
5:30 PM - 5:45 PM	0	0	0
5:45 PM - 6:00 PM	0	0	0
6:00 PM - 6:15 PM	0	0	0
6:15 PM - 6:30 PM	0	0	0
6:30 PM - 6:45 PM	0	0	0
6:45 PM - 7:00 PM	1	0	1
7:00 PM - 7:15 PM	0	1	1
7:15 PM - 7:30 PM	0	0	0
7:30 PM - 7:45 PM	1	1	2
7:45 PM - 8:00 PM	0	0	0
8:00 PM - 8:15 PM	0	0	0
8:15 PM - 8:30 PM	0	0	0
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	20	20	40

Sunday, 7/26/2026			
Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	0	0	0
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	1	0	1
7:00 AM - 7:15 AM	1	0	1
7:15 AM - 7:30 AM	6	0	6
7:30 AM - 7:45 AM	4	0	4
7:45 AM - 8:00 AM	1	0	1
8:00 AM - 8:15 AM	1	0	1
8:15 AM - 8:30 AM	6	0	6
8:30 AM - 8:45 AM	12	0	12
8:45 AM - 9:00 AM	52	1	53
9:00 AM - 9:15 AM	14	1	15
9:15 AM - 9:30 AM	4	1	5
9:30 AM - 9:45 AM	0	1	1
9:45 AM - 10:00 AM	6	0	6
10:00 AM - 10:15 AM	13	4	17
10:15 AM - 10:30 AM	69	43	112
10:30 AM - 10:45 AM	35	29	64
10:45 AM - 11:00 AM	7	3	10
11:00 AM - 11:15 AM	2	6	8
11:15 AM - 11:30 AM	2	2	4
11:30 AM - 11:45 AM	3	4	7
11:45 AM - 12:00 PM	1	65	66
12:00 PM - 12:15 PM	2	52	54
12:15 PM - 12:30 PM	3	10	13
12:30 PM - 12:45 PM	4	9	13
12:45 PM - 1:00 PM	3	3	6
1:00 PM - 1:15 PM	0	0	0
1:15 PM - 1:30 PM	1	1	2
1:30 PM - 1:45 PM	1	4	5
1:45 PM - 2:00 PM	3	8	11
2:00 PM - 2:15 PM	0	4	4
2:15 PM - 2:30 PM	2	6	8
2:30 PM - 2:45 PM	0	0	0
2:45 PM - 3:00 PM	0	1	1
3:00 PM - 3:15 PM	2	2	4
3:15 PM - 3:30 PM	3	3	6
3:30 PM - 3:45 PM	1	0	1
3:45 PM - 4:00 PM	2	4	6
4:00 PM - 4:15 PM	0	0	0
4:15 PM - 4:30 PM	0	2	2
4:30 PM - 4:45 PM	0	0	0
4:45 PM - 5:00 PM	1	1	2
5:00 PM - 5:15 PM	1	1	2
5:15 PM - 5:30 PM	0	0	0
5:30 PM - 5:45 PM	0	0	0
5:45 PM - 6:00 PM	0	0	0
6:00 PM - 6:15 PM	2	0	2
6:15 PM - 6:30 PM	1	1	2
6:30 PM - 6:45 PM	0	0	0
6:45 PM - 7:00 PM	0	0	0
7:00 PM - 7:15 PM	0	0	0
7:15 PM - 7:30 PM	0	0	0
7:30 PM - 7:45 PM	0	0	0
7:45 PM - 8:00 PM	0	0	0
8:00 PM - 8:15 PM	0	0	0
8:15 PM - 8:30 PM	0	0	0
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	272	272	544

North Albany Trip Data

Weekday Average (Tue / Wed / Thu)

Avg IN	Avg OUT	Avg Total
29	29	59

Tuesday, 7/21/2020

Time	IN	OUT	Total (IN+OUT)	Peak Hour
5:00 AM - 5:15 AM	0	0	0	
5:15 AM - 5:30 AM	0	0	0	
5:30 AM - 5:45 AM	0	0	0	
5:45 AM - 6:00 AM	0	0	0	0
6:00 AM - 6:15 AM	0	0	0	0
6:15 AM - 6:30 AM	0	0	0	0
6:30 AM - 6:45 AM	0	0	0	0
6:45 AM - 7:00 AM	0	3	3	3
7:00 AM - 7:15 AM	0	0	0	3
7:15 AM - 7:30 AM	0	0	0	3
7:30 AM - 7:45 AM	0	0	0	3
7:45 AM - 8:00 AM	0	0	0	0
8:00 AM - 8:15 AM	0	0	0	0
8:15 AM - 8:30 AM	1	0	1	1
8:30 AM - 8:45 AM	1	0	1	2
8:45 AM - 9:00 AM	0	0	0	2
9:00 AM - 9:15 AM	1	0	1	3
9:15 AM - 9:30 AM	0	0	0	2
9:30 AM - 9:45 AM	0	0	0	1
9:45 AM - 10:00 AM	1	1	2	3
10:00 AM - 10:15 AM	1	0	1	3
10:15 AM - 10:30 AM	2	2	4	7
10:30 AM - 10:45 AM	1	0	1	8
10:45 AM - 11:00 AM	0	1	1	7
11:00 AM - 11:15 AM	2	0	2	8
11:15 AM - 11:30 AM	0	1	1	5
11:30 AM - 11:45 AM	1	1	2	6
11:45 AM - 12:00 PM	0	0	0	5
12:00 PM - 12:15 PM	1	0	1	4
12:15 PM - 12:30 PM	0	1	1	4
12:30 PM - 12:45 PM	0	0	0	2
12:45 PM - 1:00 PM	1	0	1	3
1:00 PM - 1:15 PM	0	0	0	2
1:15 PM - 1:30 PM	2	1	3	4
1:30 PM - 1:45 PM	2	0	2	6
1:45 PM - 2:00 PM	0	4	4	9
2:00 PM - 2:15 PM	1	2	3	12
2:15 PM - 2:30 PM	0	1	1	10
2:30 PM - 2:45 PM	0	1	1	9
2:45 PM - 3:00 PM	0	0	0	5
3:00 PM - 3:15 PM	1	1	2	4
3:15 PM - 3:30 PM	1	2	3	6
3:30 PM - 3:45 PM	0	0	0	5
3:45 PM - 4:00 PM	0	1	1	6
4:00 PM - 4:15 PM	0	0	0	4
4:15 PM - 4:30 PM	0	0	0	1
4:30 PM - 4:45 PM	1	0	1	2
4:45 PM - 5:00 PM	1	1	2	3
5:00 PM - 5:15 PM	0	0	0	3
5:15 PM - 5:30 PM	1	1	2	5
5:30 PM - 5:45 PM	1	0	1	5
5:45 PM - 6:00 PM	1	0	1	4
6:00 PM - 6:15 PM	0	0	0	4
6:15 PM - 6:30 PM	2	2	4	6
6:30 PM - 6:45 PM	1	1	2	7
6:45 PM - 7:00 PM	0	0	0	6
7:00 PM - 7:15 PM	0	0	0	6
7:15 PM - 7:30 PM	0	0	0	2
7:30 PM - 7:45 PM	0	0	0	0
7:45 PM - 8:00 PM	0	0	0	0
8:00 PM - 8:15 PM	0	0	0	0
8:15 PM - 8:30 PM	0	0	0	0
8:30 PM - 8:45 PM	0	0	0	0
8:45 PM - 9:00 PM	0	0	0	0
9:00 PM - 9:15 PM	0	0	0	0
9:15 PM - 9:30 PM	0	0	0	0
9:30 PM - 9:45 PM	0	0	0	0
9:45 PM - 10:00 PM	0	0	0	0
TOTAL (ADT)	28	28	56	12

Wednesday, 7/22/2026			
Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	0	0	0
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	0	0	0
7:00 AM - 7:15 AM	0	0	0
7:15 AM - 7:30 AM	0	0	0
7:30 AM - 7:45 AM	0	0	0
7:45 AM - 8:00 AM	0	0	0
8:00 AM - 8:15 AM	0	0	0
8:15 AM - 8:30 AM	1	0	1
8:30 AM - 8:45 AM	0	0	0
8:45 AM - 9:00 AM	1	1	2
9:00 AM - 9:15 AM	0	0	0
9:15 AM - 9:30 AM	1	0	1
9:30 AM - 9:45 AM	0	0	0
9:45 AM - 10:00 AM	0	0	0
10:00 AM - 10:15 AM	0	1	1
10:15 AM - 10:30 AM	1	0	1
10:30 AM - 10:45 AM	0	1	1
10:45 AM - 11:00 AM	0	0	0
11:00 AM - 11:15 AM	0	0	0
11:15 AM - 11:30 AM	2	2	4
11:30 AM - 11:45 AM	1	1	2
11:45 AM - 12:00 PM	1	0	1
12:00 PM - 12:15 PM	0	0	0
12:15 PM - 12:30 PM	0	0	0
12:30 PM - 12:45 PM	0	0	0
12:45 PM - 1:00 PM	0	0	0
1:00 PM - 1:15 PM	2	0	2
1:15 PM - 1:30 PM	0	1	1
1:30 PM - 1:45 PM	0	0	0
1:45 PM - 2:00 PM	0	0	0
2:00 PM - 2:15 PM	1	1	2
2:15 PM - 2:30 PM	0	1	1
2:30 PM - 2:45 PM	1	0	1
2:45 PM - 3:00 PM	3	2	5
3:00 PM - 3:15 PM	0	1	1
3:15 PM - 3:30 PM	0	1	1
3:30 PM - 3:45 PM	1	3	4
3:45 PM - 4:00 PM	0	0	0
4:00 PM - 4:15 PM	0	1	1
4:15 PM - 4:30 PM	0	0	0
4:30 PM - 4:45 PM	0	0	0
4:45 PM - 5:00 PM	0	0	0
5:00 PM - 5:15 PM	1	1	2
5:15 PM - 5:30 PM	0	0	0
5:30 PM - 5:45 PM	1	0	1
5:45 PM - 6:00 PM	0	0	0
6:00 PM - 6:15 PM	2	0	2
6:15 PM - 6:30 PM	4	1	5
6:30 PM - 6:45 PM	0	4	4
6:45 PM - 7:00 PM	1	2	3
7:00 PM - 7:15 PM	0	0	0
7:15 PM - 7:30 PM	0	0	0
7:30 PM - 7:45 PM	0	0	0
7:45 PM - 8:00 PM	1	0	1
8:00 PM - 8:15 PM	0	1	1
8:15 PM - 8:30 PM	0	0	0
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	26	26	52

Thursday, 7/23/2026	Time	IN	OUT	Total (IN+OUT)
	5:00 AM - 5:15 AM	0	0	0
	5:15 AM - 5:30 AM	0	0	0
	5:30 AM - 5:45 AM	0	0	0
	5:45 AM - 6:00 AM	0	0	0
	6:00 AM - 6:15 AM	0	0	0
	6:15 AM - 6:30 AM	0	0	0
	6:30 AM - 6:45 AM	0	0	0
	6:45 AM - 7:00 AM	0	0	0
	7:00 AM - 7:15 AM	0	0	0
	7:15 AM - 7:30 AM	0	0	0
	7:30 AM - 7:45 AM	0	0	0
	7:45 AM - 8:00 AM	0	0	0
	8:00 AM - 8:15 AM	0	0	0
	8:15 AM - 8:30 AM	0	0	0
	8:30 AM - 8:45 AM	1	0	1
	8:45 AM - 9:00 AM	1	0	1
	9:00 AM - 9:15 AM	2	0	2
	9:15 AM - 9:30 AM	0	0	0
	9:30 AM - 9:45 AM	0	0	0
	9:45 AM - 10:00 AM	0	0	0
	10:00 AM - 10:15 AM	0	0	0
	10:15 AM - 10:30 AM	0	0	0
	10:30 AM - 10:45 AM	1	0	1
	10:45 AM - 11:00 AM	2	2	4
	11:00 AM - 11:15 AM	0	2	2
	11:15 AM - 11:30 AM	1	0	1
	11:30 AM - 11:45 AM	1	2	3
	11:45 AM - 12:00 PM	1	2	3
	12:00 PM - 12:15 PM	2	2	4
	12:15 PM - 12:30 PM	0	0	0
	12:30 PM - 12:45 PM	2	1	3
	12:45 PM - 1:00 PM	1	2	3
	1:00 PM - 1:15 PM	1	1	2
	1:15 PM - 1:30 PM	1	0	1
	1:30 PM - 1:45 PM	1	0	1
	1:45 PM - 2:00 PM	1	0	1
	2:00 PM - 2:15 PM	0	2	2
	2:15 PM - 2:30 PM	1	1	2
	2:30 PM - 2:45 PM	0	1	1
	2:45 PM - 3:00 PM	2	1	3
	3:00 PM - 3:15 PM	1	1	2
	3:15 PM - 3:30 PM	0	0	0
	3:30 PM - 3:45 PM	0	1	1
	3:45 PM - 4:00 PM	0	1	1
	4:00 PM - 4:15 PM	0	2	2
	4:15 PM - 4:30 PM	1	1	2
	4:30 PM - 4:45 PM	0	0	0
	4:45 PM - 5:00 PM	1	0	1
	5:00 PM - 5:15 PM	1	0	1
	5:15 PM - 5:30 PM	1	0	1
	5:30 PM - 5:45 PM	1	0	1
	5:45 PM - 6:00 PM	0	0	0
	6:00 PM - 6:15 PM	1	0	1
	6:15 PM - 6:30 PM	1	5	6
	6:30 PM - 6:45 PM	1	0	1
	6:45 PM - 7:00 PM	0	0	0
	7:00 PM - 7:15 PM	2	0	2
	7:15 PM - 7:30 PM	0	2	2
	7:30 PM - 7:45 PM	1	2	3
	7:45 PM - 8:00 PM	0	0	0
	8:00 PM - 8:15 PM	0	0	0
	8:15 PM - 8:30 PM	0	0	0
	8:30 PM - 8:45 PM	0	0	0
	8:45 PM - 9:00 PM	0	0	0
	9:00 PM - 9:15 PM	0	0	0
	9:15 PM - 9:30 PM	0	0	0
	9:30 PM - 9:45 PM	0	0	0
	9:45 PM - 10:00 PM	0	0	0
	TOTAL (ADT)	34	34	68

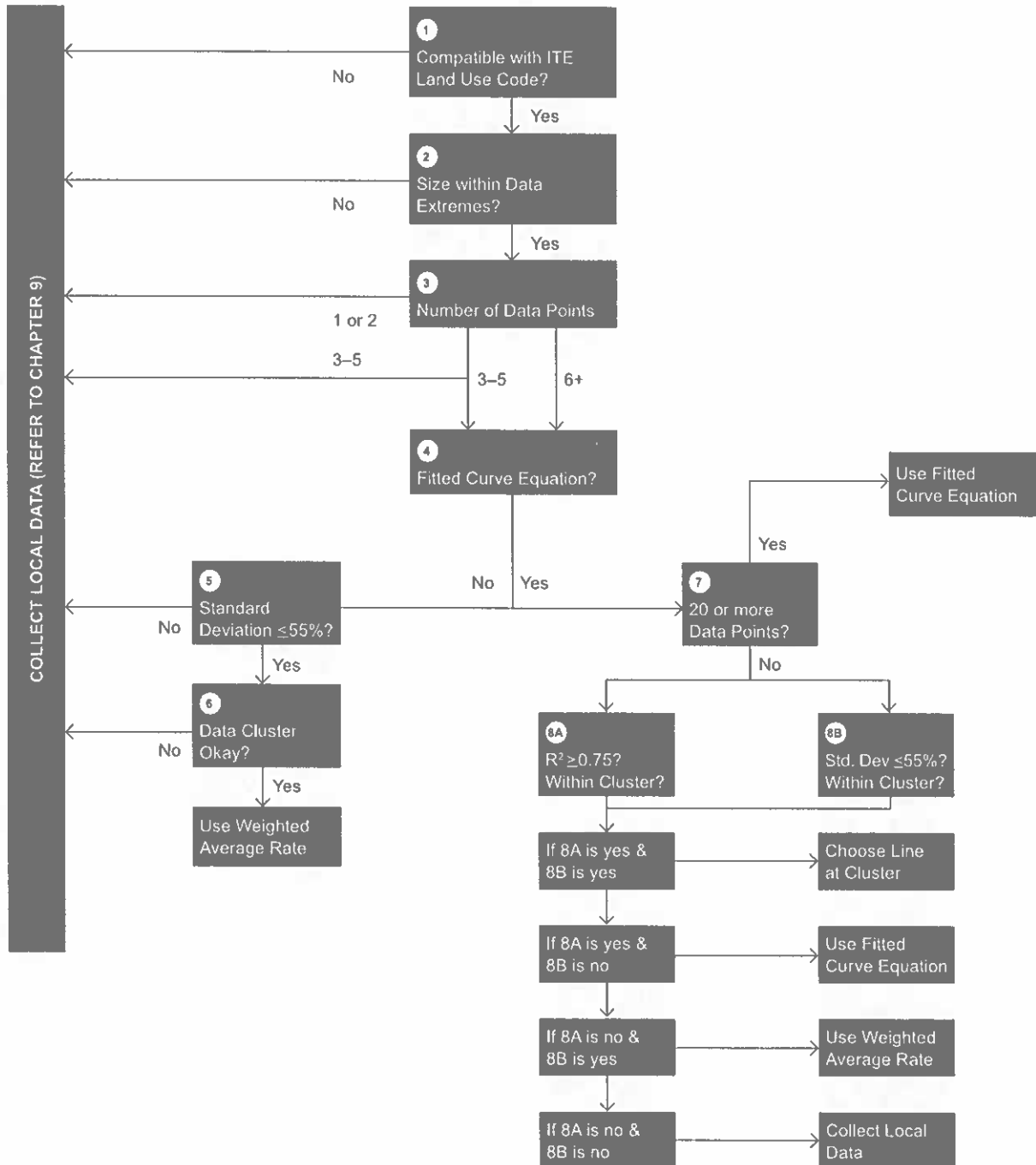
Saturday, 7/25/2026

Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	0	0	0
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	2	0	2
7:00 AM - 7:15 AM	1	2	3
7:15 AM - 7:30 AM	0	0	0
7:30 AM - 7:45 AM	0	0	0
7:45 AM - 8:00 AM	0	0	0
8:00 AM - 8:15 AM	1	1	2
8:15 AM - 8:30 AM	0	0	0
8:30 AM - 8:45 AM	1	1	2
8:45 AM - 9:00 AM	2	0	2
9:00 AM - 9:15 AM	3	0	3
9:15 AM - 9:30 AM	2	1	3
9:30 AM - 9:45 AM	0	0	0
9:45 AM - 10:00 AM	2	0	2
10:00 AM - 10:15 AM	2	2	4
10:15 AM - 10:30 AM	3	2	5
10:30 AM - 10:45 AM	1	1	2
10:45 AM - 11:00 AM	0	1	1
11:00 AM - 11:15 AM	0	1	1
11:15 AM - 11:30 AM	0	2	2
11:30 AM - 11:45 AM	1	0	1
11:45 AM - 12:00 PM	1	0	1
12:00 PM - 12:15 PM	1	0	1
12:15 PM - 12:30 PM	1	1	2
12:30 PM - 12:45 PM	0	0	0
12:45 PM - 1:00 PM	1	2	3
1:00 PM - 1:15 PM	1	0	1
1:15 PM - 1:30 PM	0	0	0
1:30 PM - 1:45 PM	0	0	0
1:45 PM - 2:00 PM	1	1	2
2:00 PM - 2:15 PM	0	1	1
2:15 PM - 2:30 PM	1	0	1
2:30 PM - 2:45 PM	0	0	0
2:45 PM - 3:00 PM	0	1	1
3:00 PM - 3:15 PM	1	0	1
3:15 PM - 3:30 PM	0	1	1
3:30 PM - 3:45 PM	0	0	0
3:45 PM - 4:00 PM	3	3	6
4:00 PM - 4:15 PM	5	1	6
4:15 PM - 4:30 PM	2	0	2
4:30 PM - 4:45 PM	0	0	0
4:45 PM - 5:00 PM	1	5	6
5:00 PM - 5:15 PM	1	5	6
5:15 PM - 5:30 PM	1	1	2
5:30 PM - 5:45 PM	0	0	0
5:45 PM - 6:00 PM	0	0	0
6:00 PM - 6:15 PM	0	0	0
6:15 PM - 6:30 PM	1	2	3
6:30 PM - 6:45 PM	1	1	2
6:45 PM - 7:00 PM	1	2	3
7:00 PM - 7:15 PM	0	1	1
7:15 PM - 7:30 PM	1	1	2
7:30 PM - 7:45 PM	0	2	2
7:45 PM - 8:00 PM	0	1	1
8:00 PM - 8:15 PM	0	0	0
8:15 PM - 8:30 PM	0	0	0
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	46	46	92

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0
14

Sunday, 7/26/2026			
Time	IN	OUT	Total (IN+OUT)
5:00 AM - 5:15 AM	0	0	0
5:15 AM - 5:30 AM	0	0	0
5:30 AM - 5:45 AM	0	0	0
5:45 AM - 6:00 AM	0	0	0
6:00 AM - 6:15 AM	0	0	0
6:15 AM - 6:30 AM	0	0	0
6:30 AM - 6:45 AM	0	0	0
6:45 AM - 7:00 AM	0	0	0
7:00 AM - 7:15 AM	0	0	0
7:15 AM - 7:30 AM	0	0	0
7:30 AM - 7:45 AM	0	0	0
7:45 AM - 8:00 AM	0	0	0
8:00 AM - 8:15 AM	3	0	3
8:15 AM - 8:30 AM	2	0	2
8:30 AM - 8:45 AM	2	0	2
8:45 AM - 9:00 AM	6	1	7
9:00 AM - 9:15 AM	3	0	3
9:15 AM - 9:30 AM	5	0	5
9:30 AM - 9:45 AM	14	0	14
9:45 AM - 10:00 AM	52	1	53
10:00 AM - 10:15 AM	19	0	19
10:15 AM - 10:30 AM	1	2	3
10:30 AM - 10:45 AM	3	1	4
10:45 AM - 11:00 AM	2	2	4
11:00 AM - 11:15 AM	0	0	0
11:15 AM - 11:30 AM	2	49	51
11:30 AM - 11:45 AM	2	34	36
11:45 AM - 12:00 PM	1	14	15
12:00 PM - 12:15 PM	2	2	4
12:15 PM - 12:30 PM	3	3	6
12:30 PM - 12:45 PM	1	1	2
12:45 PM - 1:00 PM	0	3	3
1:00 PM - 1:15 PM	2	3	5
1:15 PM - 1:30 PM	0	0	0
1:30 PM - 1:45 PM	2	4	6
1:45 PM - 2:00 PM	1	1	2
2:00 PM - 2:15 PM	0	0	0
2:15 PM - 2:30 PM	0	0	0
2:30 PM - 2:45 PM	0	0	0
2:45 PM - 3:00 PM	1	1	2
3:00 PM - 3:15 PM	0	0	0
3:15 PM - 3:30 PM	0	1	1
3:30 PM - 3:45 PM	0	0	0
3:45 PM - 4:00 PM	1	1	2
4:00 PM - 4:15 PM	1	1	2
4:15 PM - 4:30 PM	0	1	1
4:30 PM - 4:45 PM	1	1	2
4:45 PM - 5:00 PM	0	0	0
5:00 PM - 5:15 PM	0	4	4
5:15 PM - 5:30 PM	0	0	0
5:30 PM - 5:45 PM	0	0	0
5:45 PM - 6:00 PM	0	0	0
6:00 PM - 6:15 PM	1	1	2
6:15 PM - 6:30 PM	0	0	0
6:30 PM - 6:45 PM	0	0	0
6:45 PM - 7:00 PM	0	0	0
7:00 PM - 7:15 PM	0	1	1
7:15 PM - 7:30 PM	0	0	0
7:30 PM - 7:45 PM	0	0	0
7:45 PM - 8:00 PM	0	0	0
8:00 PM - 8:15 PM	0	0	0
8:15 PM - 8:30 PM	0	0	0
8:30 PM - 8:45 PM	0	0	0
8:45 PM - 9:00 PM	0	0	0
9:00 PM - 9:15 PM	0	0	0
9:15 PM - 9:30 PM	0	0	0
9:30 PM - 9:45 PM	0	0	0
9:45 PM - 10:00 PM	0	0	0
TOTAL (ADT)	133	133	266

**Figure 4.2 Process for Selecting Average Rate or Equation
in Trip Generation Manual Data**



Land Use: 560 Church

Description

A church is a building in which public worship services are held. A church houses an assembly hall or sanctuary. It may also house meeting rooms, classrooms, and, occasionally, dining, catering, or event facilities.

Additional Data

Worship services are typically held on Sundays. Some of the surveyed churches offered day care or extended care programs during the week.

The sites were surveyed in the 1990s, the 2000s, and the 2010s in Alberta (CAN), California, Colorado, Florida, New Jersey, New York, Oregon, Pennsylvania, and Texas.

Source Numbers

428, 436, 554, 571, 583, 629, 631, 704, 903, 904, 957, 971, 1080, 1219

Church (560)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

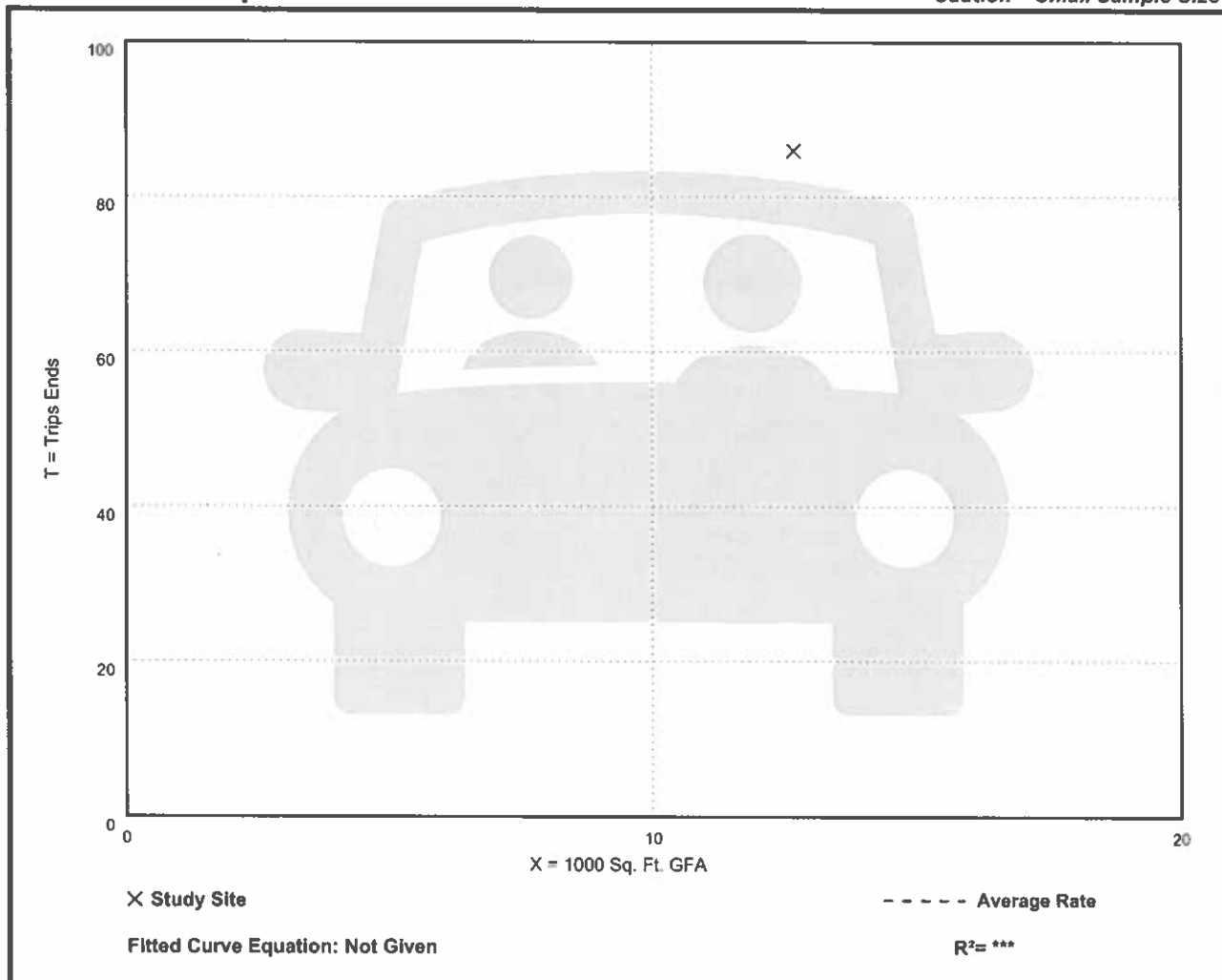
Setting/Location: General Urban/Suburban
Number of Studies: 1
Avg. 1000 Sq. Ft. GFA: 13
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
6.78	6.78 - 6.78	***

Data Plot and Equation

Caution – Small Sample Size



Church (560)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 2

Avg. 1000 Sq. Ft. GFA: 70

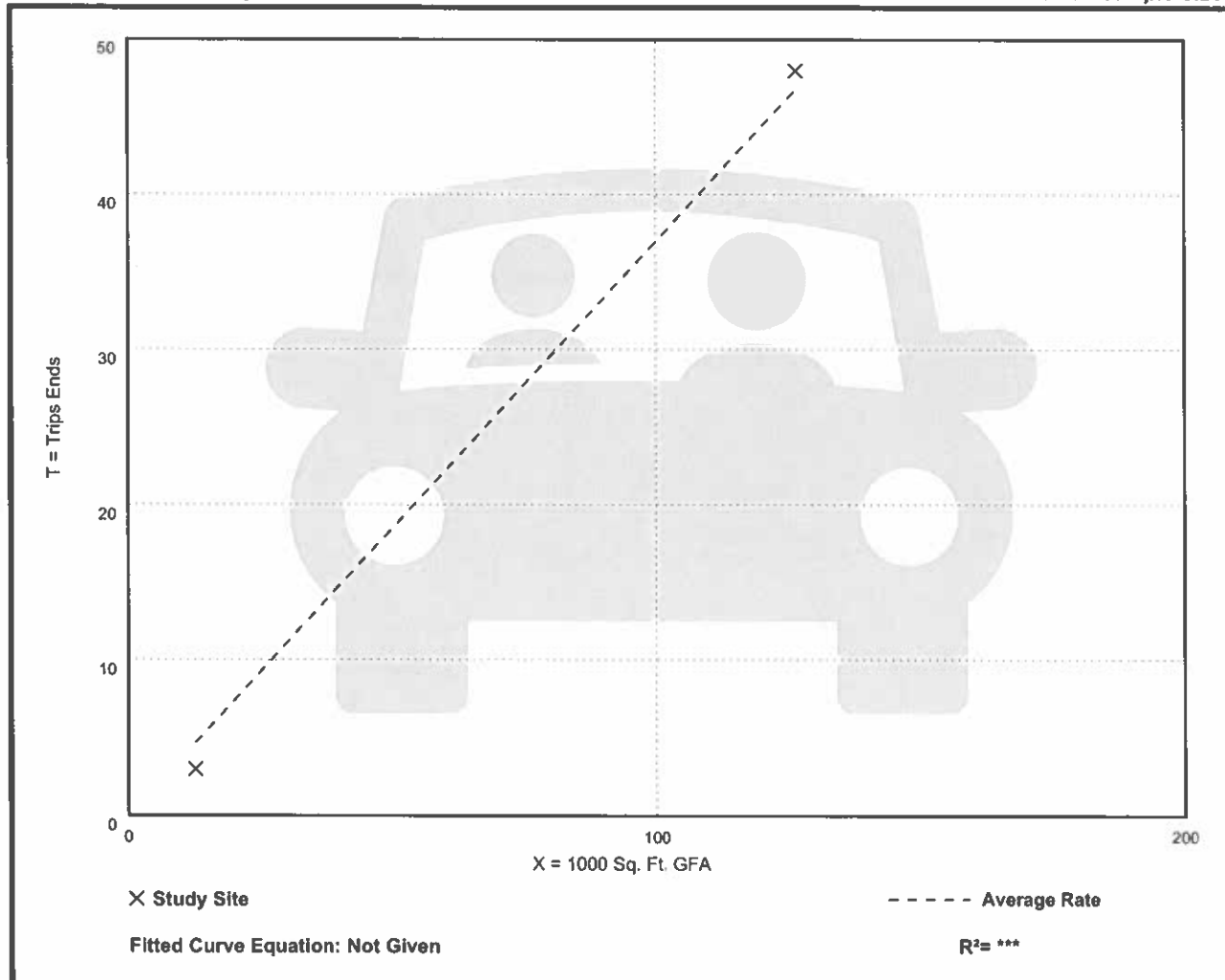
Directional Distribution: 62% entering, 38% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.37	0.24 - 0.38	***

Data Plot and Equation

Caution – Small Sample Size



Church (560)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 6

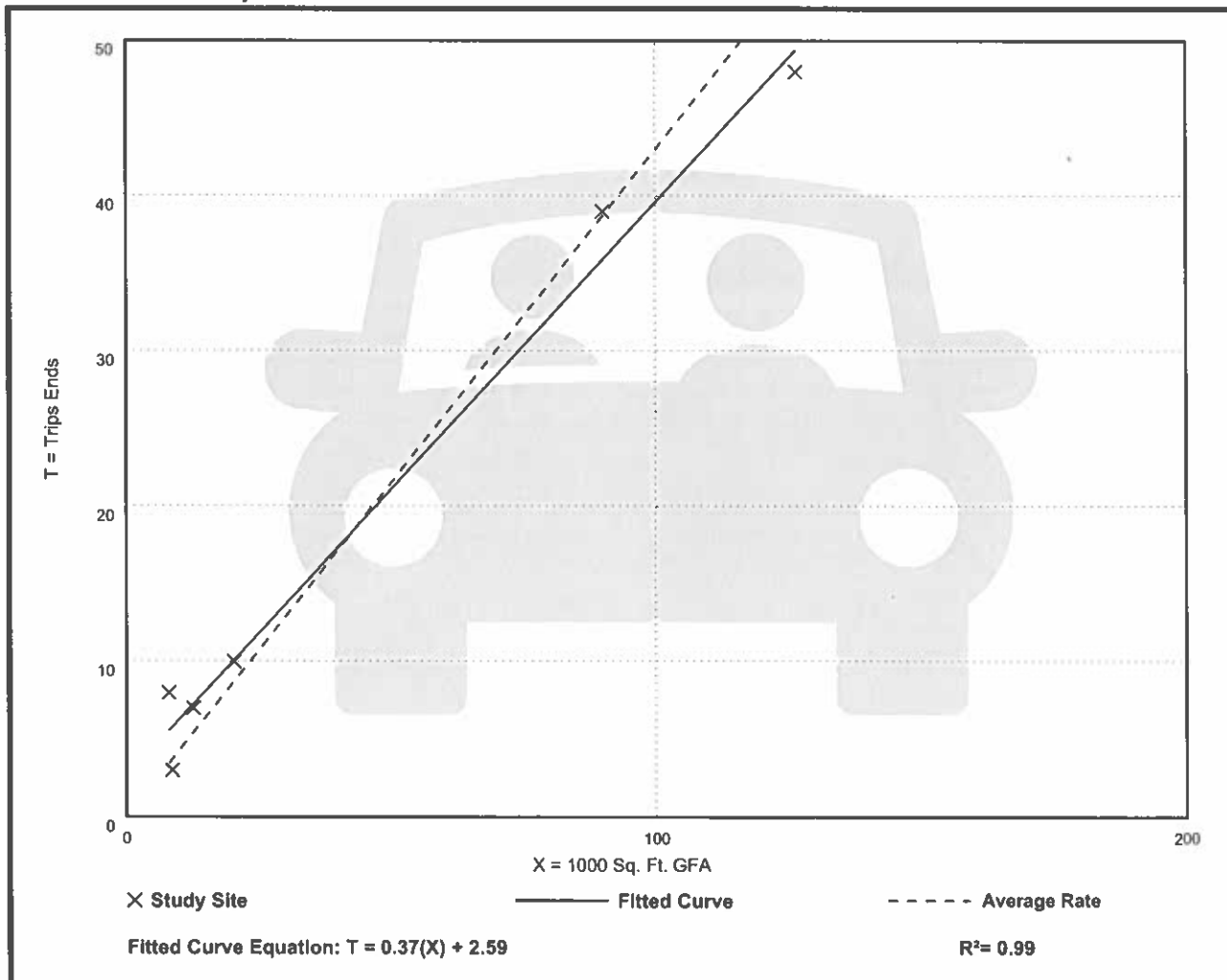
Avg. 1000 Sq. Ft. GFA: 44

Directional Distribution: 41% entering, 59% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.43	0.35 - 1.00	0.12

Data Plot and Equation



Church (560)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

AM Peak Hour of Generator

Setting/Location: General Urban/Suburban

Number of Studies: 3

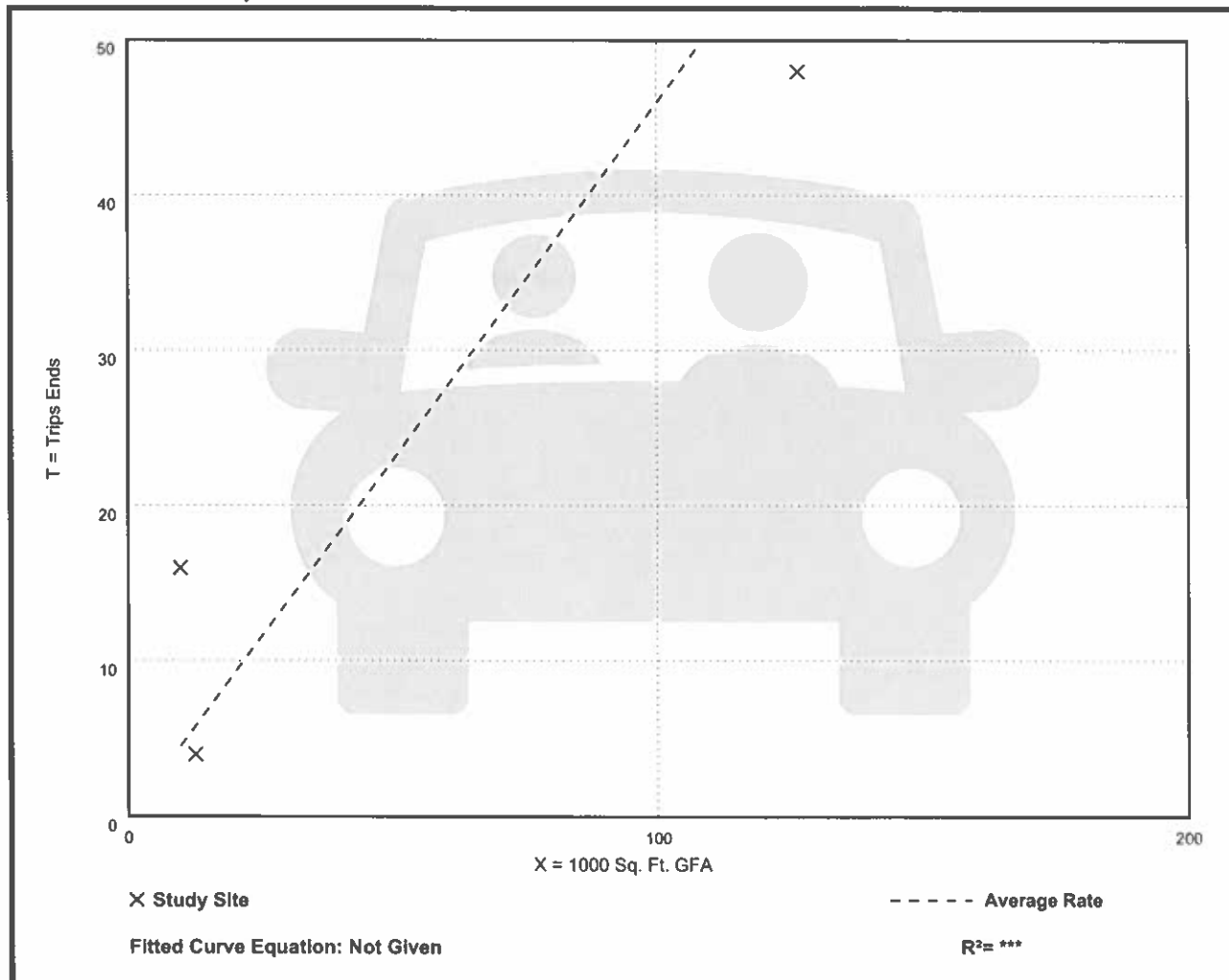
Avg. 1000 Sq. Ft. GFA: 50

Directional Distribution: 54% entering, 46% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.46	0.32 - 1.62	0.38

Data Plot and Equation



Church (560)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

PM Peak Hour of Generator

Setting/Location: General Urban/Suburban

Number of Studies: 3

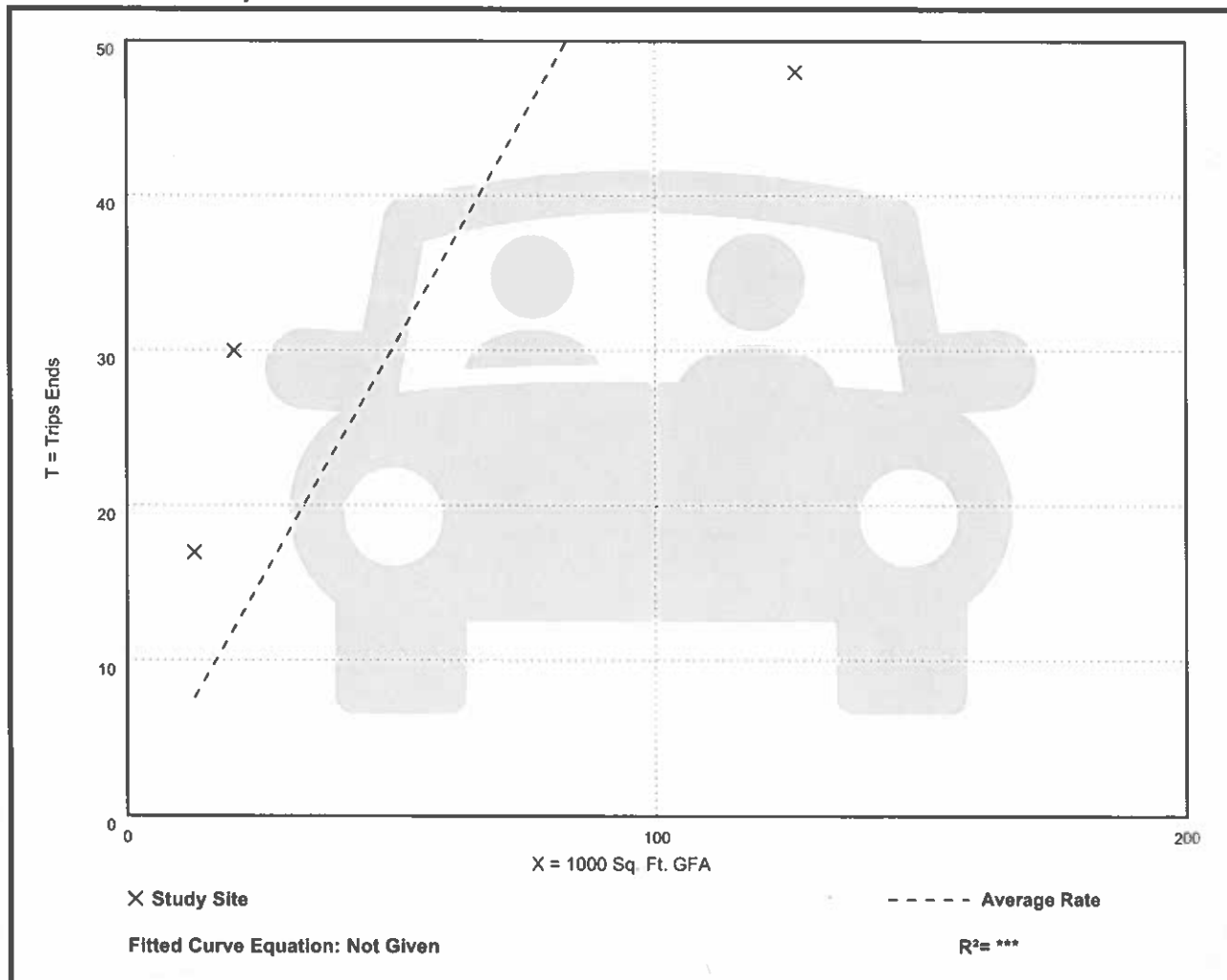
Avg. 1000 Sq. Ft. GFA: 53

Directional Distribution: 65% entering, 35% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.60	0.38 - 1.48	0.52

Data Plot and Equation



Church (560)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Sunday, Peak Hour of Generator

Setting/Location: General Urban/Suburban

Number of Studies: 10

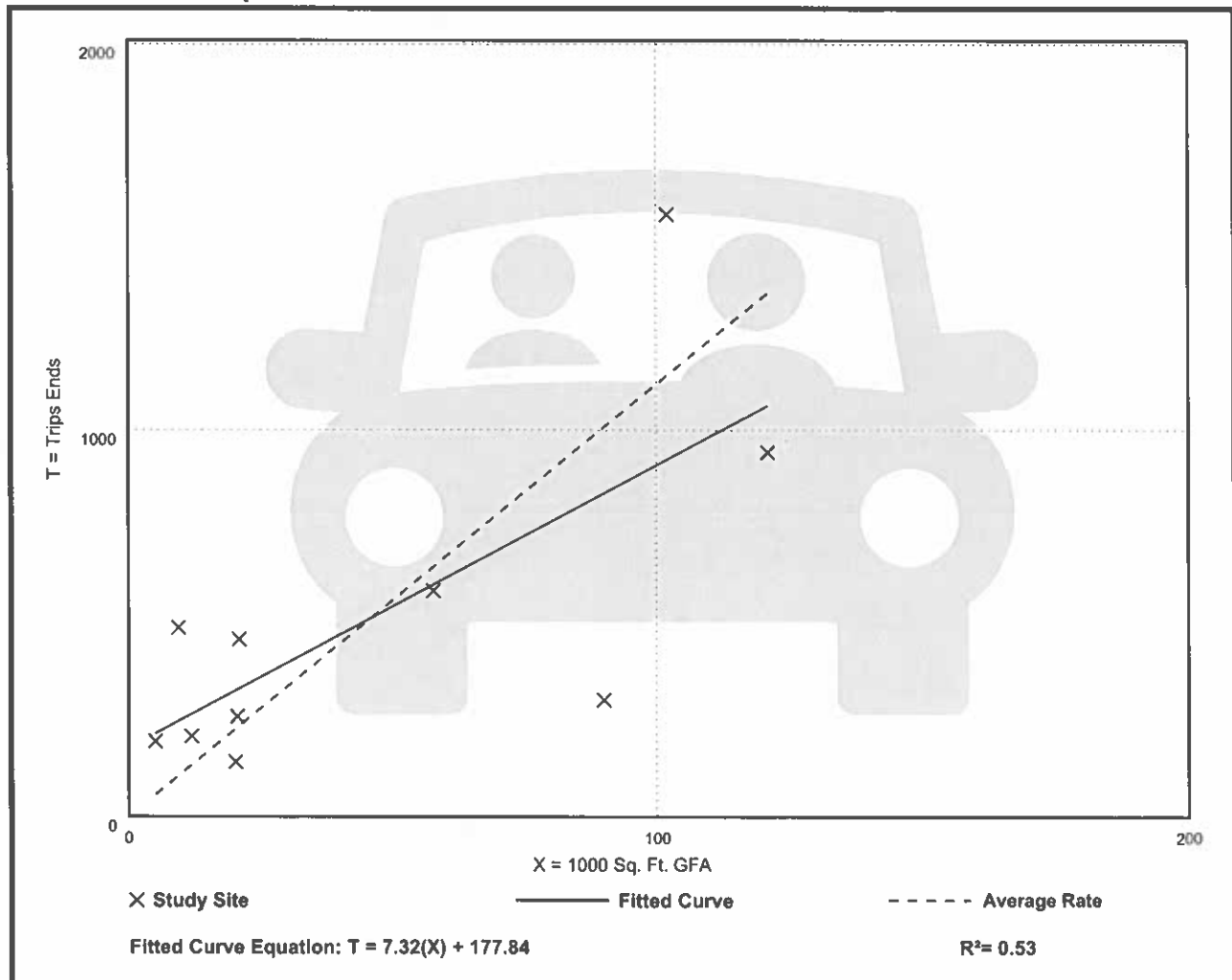
Avg. 1000 Sq. Ft. GFA: 46

Directional Distribution: 47% entering, 53% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
11.20	3.36 - 51.31	8.68

Data Plot and Equation



Church (560)

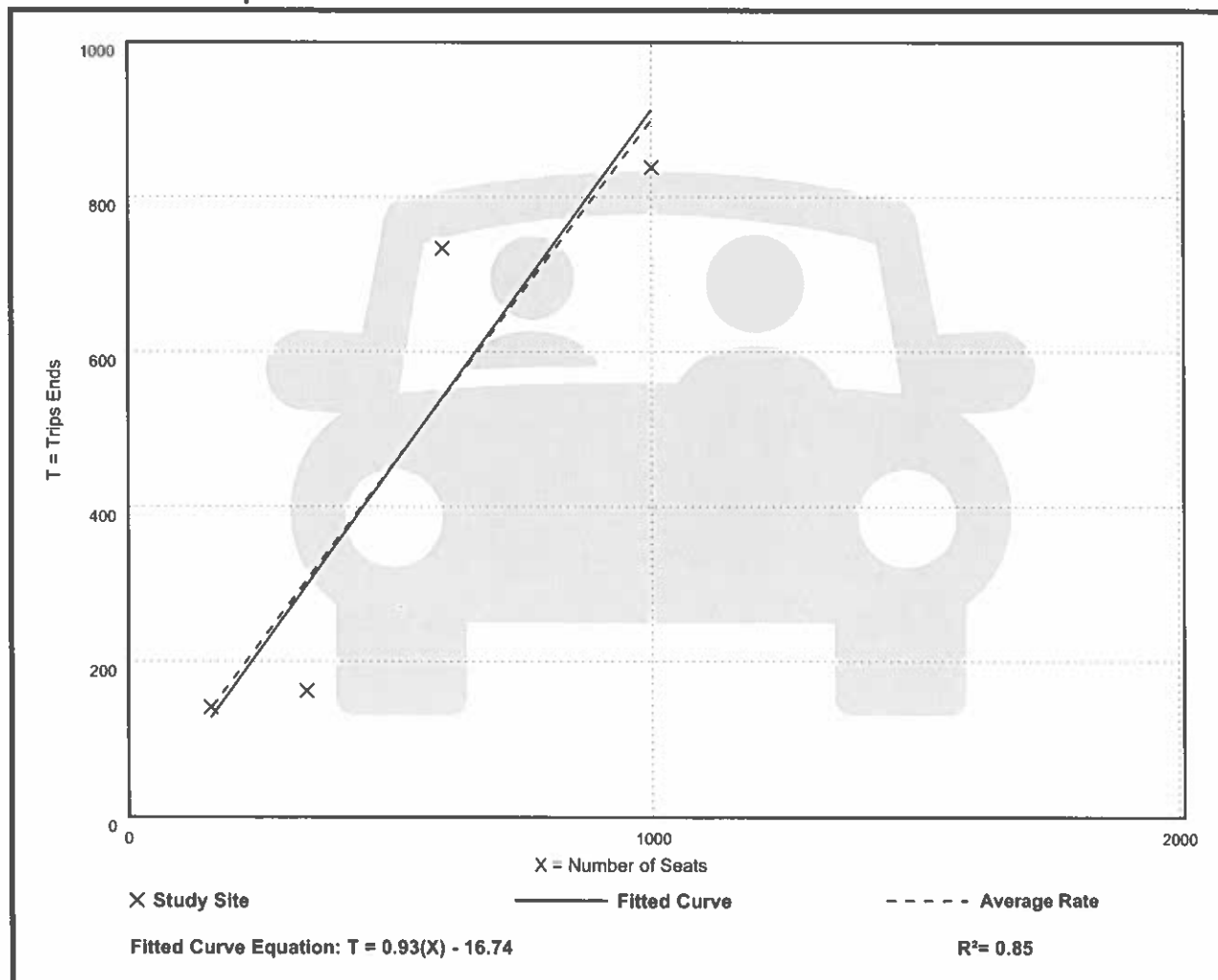
Vehicle Trip Ends vs: **Seats**
On a: **Weekday**

Setting/Location: **General Urban/Suburban**
Number of Studies: **4**
Avg. Num. of Seats: **524**
Directional Distribution: **50% entering, 50% exiting**

Vehicle Trip Generation per Seat

Average Rate	Range of Rates	Standard Deviation
0.90	0.48 - 1.22	0.28

Data Plot and Equation



Church (560)

Vehicle Trip Ends vs: Seats

On a: Weekday,

Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 2

Avg. Num. of Seats: 378

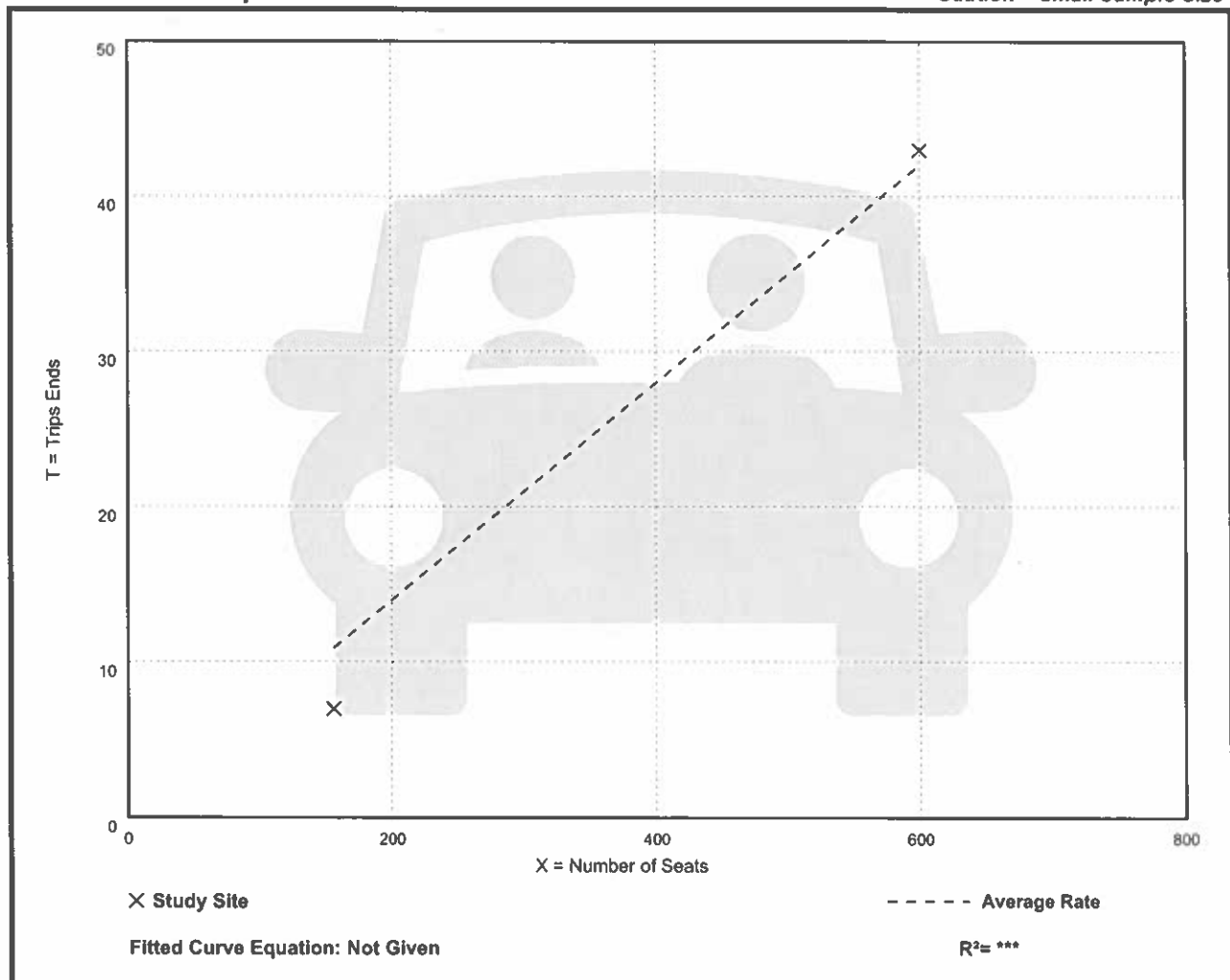
Directional Distribution: 60% entering, 40% exiting

Vehicle Trip Generation per Seat

Average Rate	Range of Rates	Standard Deviation
0.07	0.04 - 0.07	***

Data Plot and Equation

Caution – Small Sample Size



Church (560)

Vehicle Trip Ends vs: Seats

On a: Weekday,

Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 4

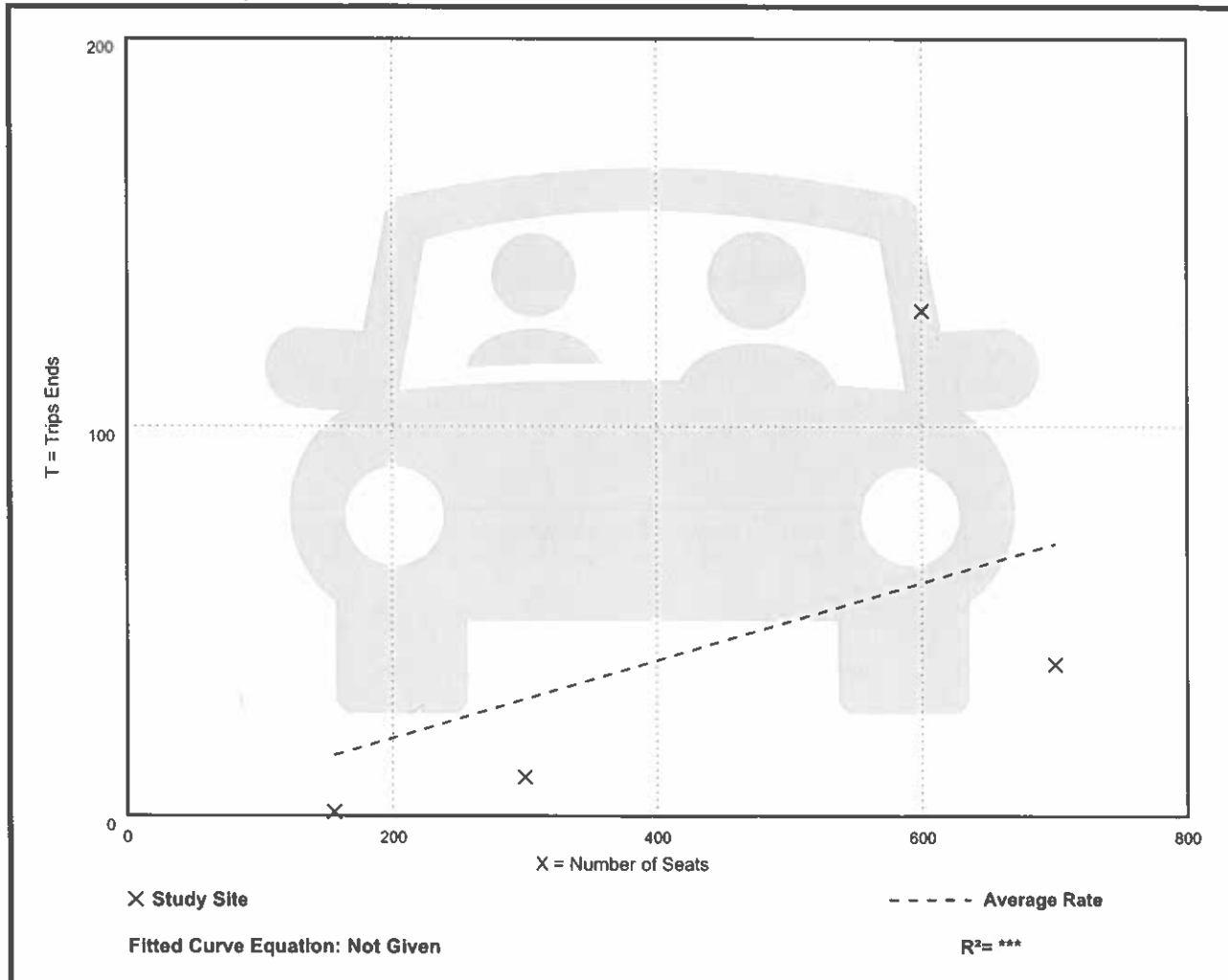
Avg. Num. of Seats: 439

Directional Distribution: 45% entering, 55% exiting

Vehicle Trip Generation per Seat

Average Rate	Range of Rates	Standard Deviation
0.10	0.01 - 0.22	0.10

Data Plot and Equation



Church (560)

Vehicle Trip Ends vs: Seats

On a: Weekday,

AM Peak Hour of Generator

Setting/Location: General Urban/Suburban

Number of Studies: 3

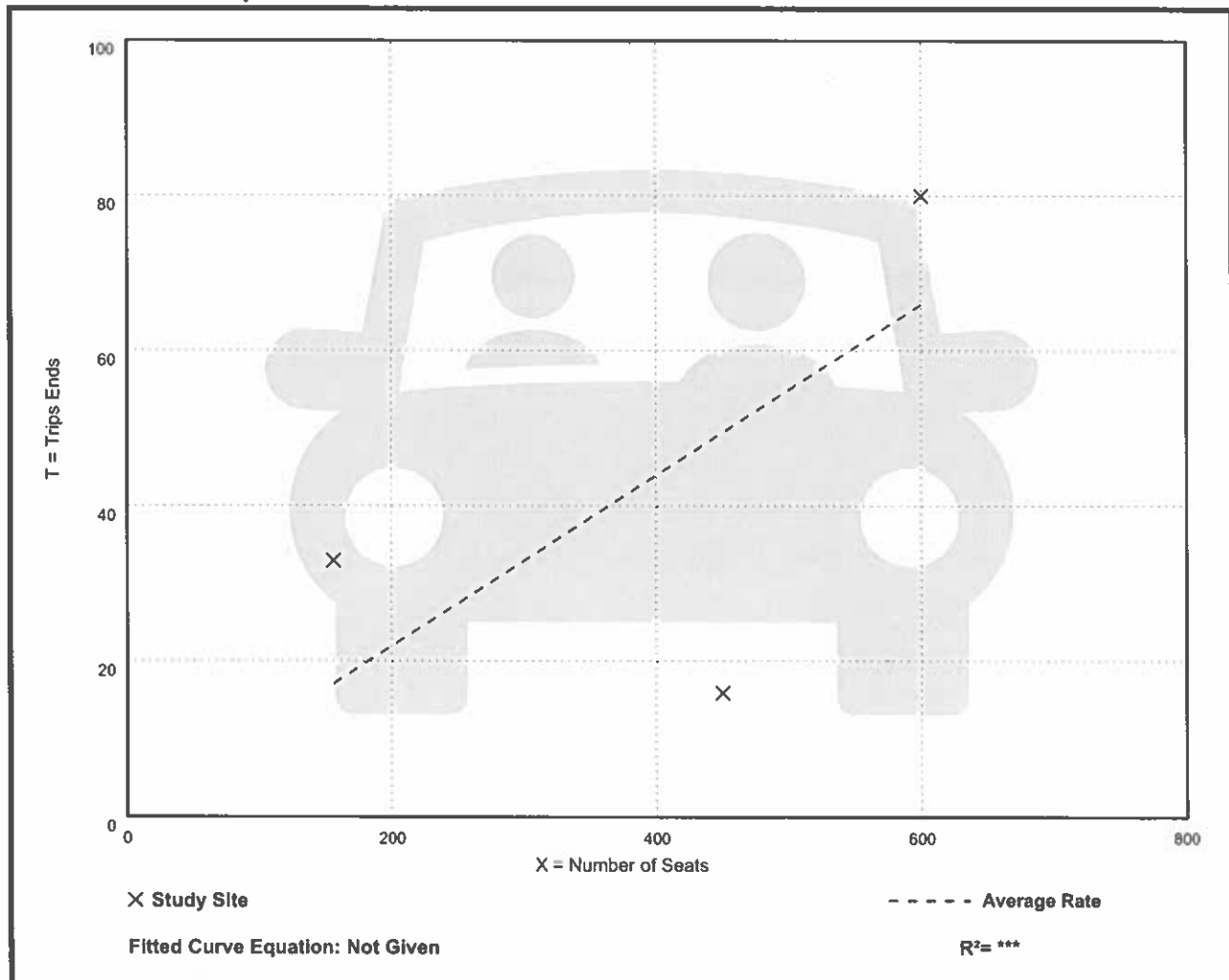
Avg. Num. of Seats: 402

Directional Distribution: 40% entering, 60% exiting

Vehicle Trip Generation per Seat

Average Rate	Range of Rates	Standard Deviation
0.11	0.04 - 0.21	0.07

Data Plot and Equation



Church (560)

Vehicle Trip Ends vs: Seats

On a: Weekday,

PM Peak Hour of Generator

Setting/Location: General Urban/Suburban

Number of Studies: 3

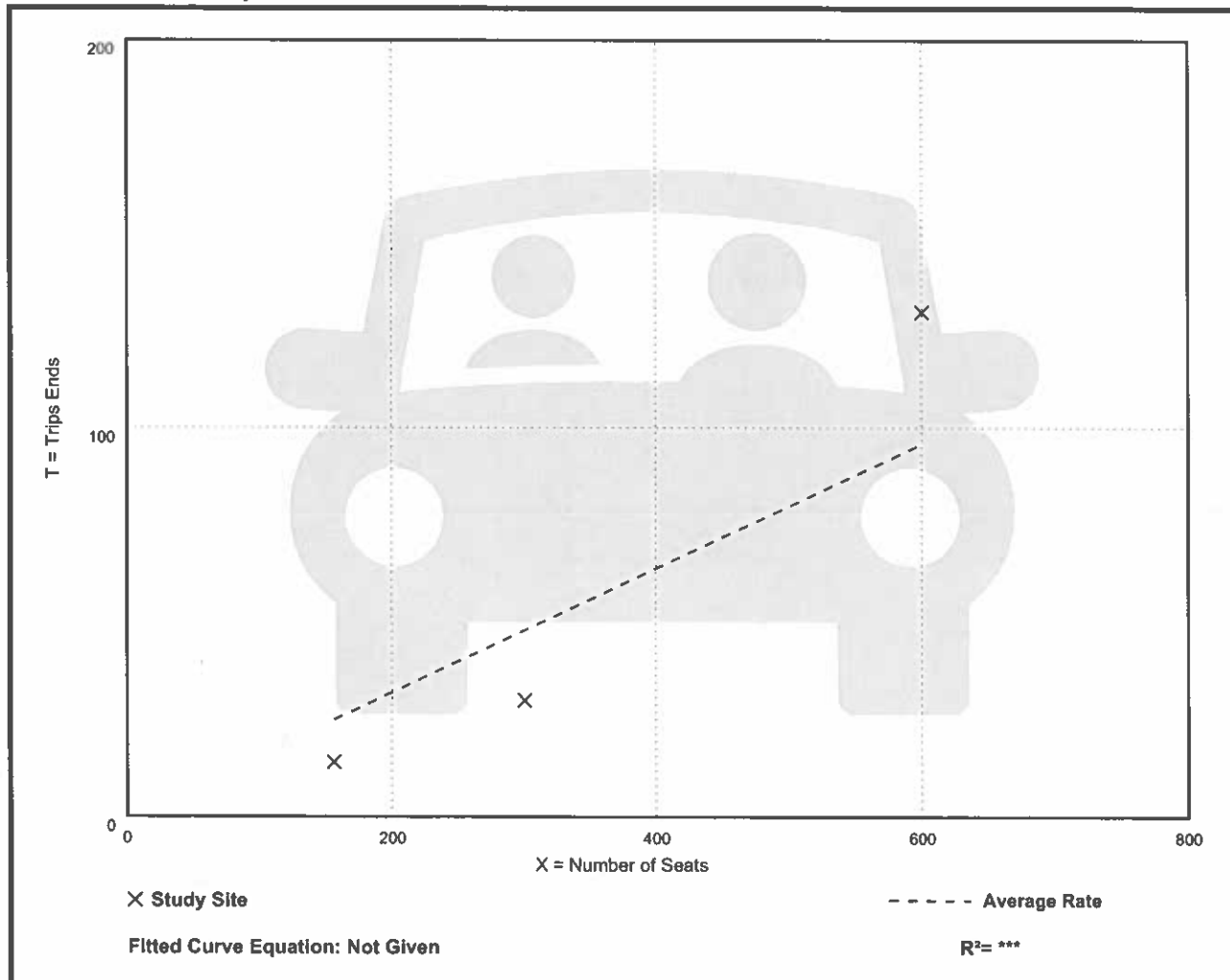
Avg. Num. of Seats: 352

Directional Distribution: 60% entering, 40% exiting

Vehicle Trip Generation per Seat

Average Rate	Range of Rates	Standard Deviation
0.16	0.09 - 0.22	0.07

Data Plot and Equation



Church (560)

Vehicle Trip Ends vs: **Seats**

On a: **Saturday, Peak Hour of Generator**

Setting/Location: **General Urban/Suburban**

Number of Studies: **1**

Avg. Num. of Seats: **149**

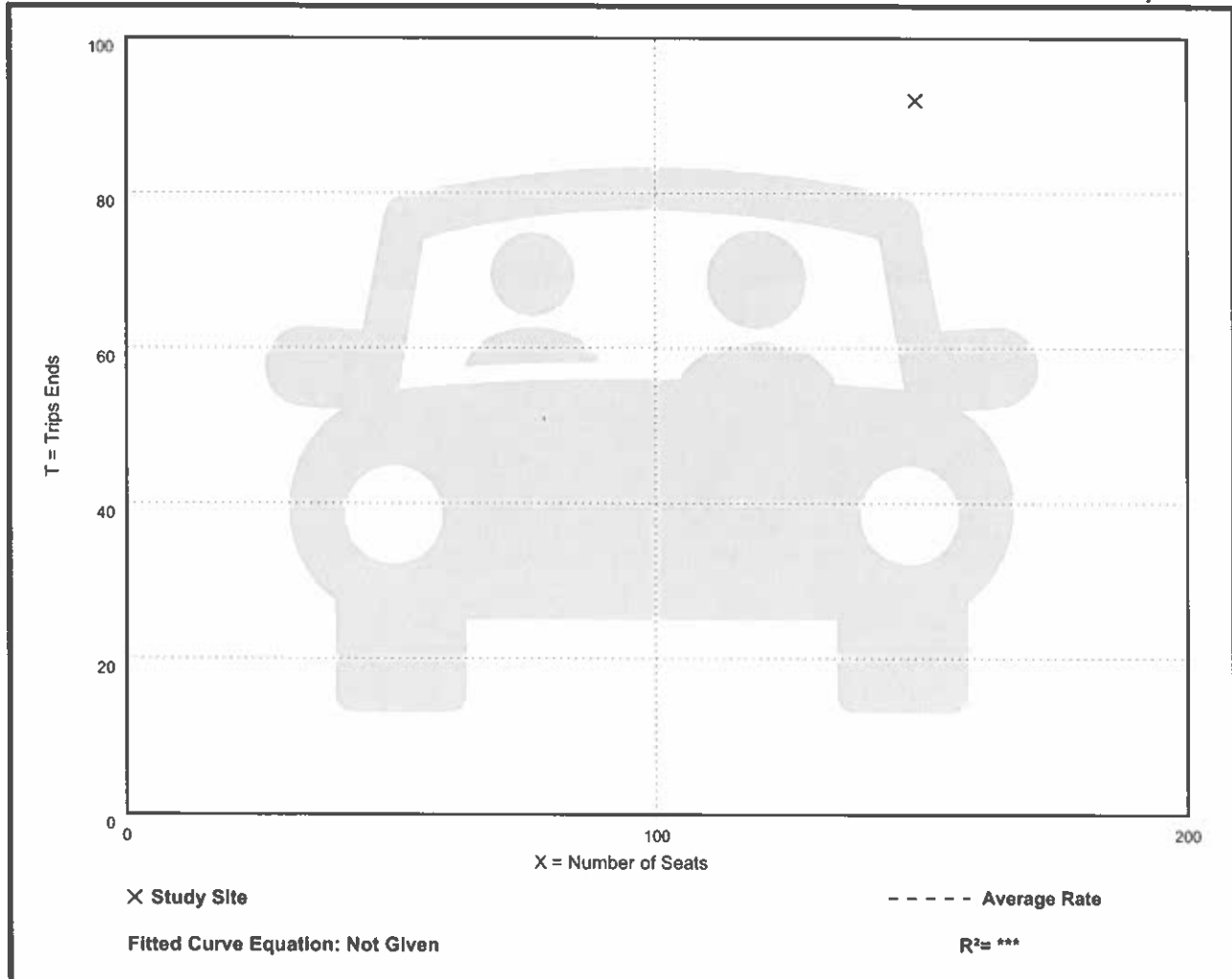
Directional Distribution: **50% entering, 50% exiting**

Vehicle Trip Generation per Seat

Average Rate	Range of Rates	Standard Deviation
0.62	0.62 - 0.62	***

Data Plot and Equation

Caution – Small Sample Size



Church (560)

Vehicle Trip Ends vs: Seats
On a: Sunday

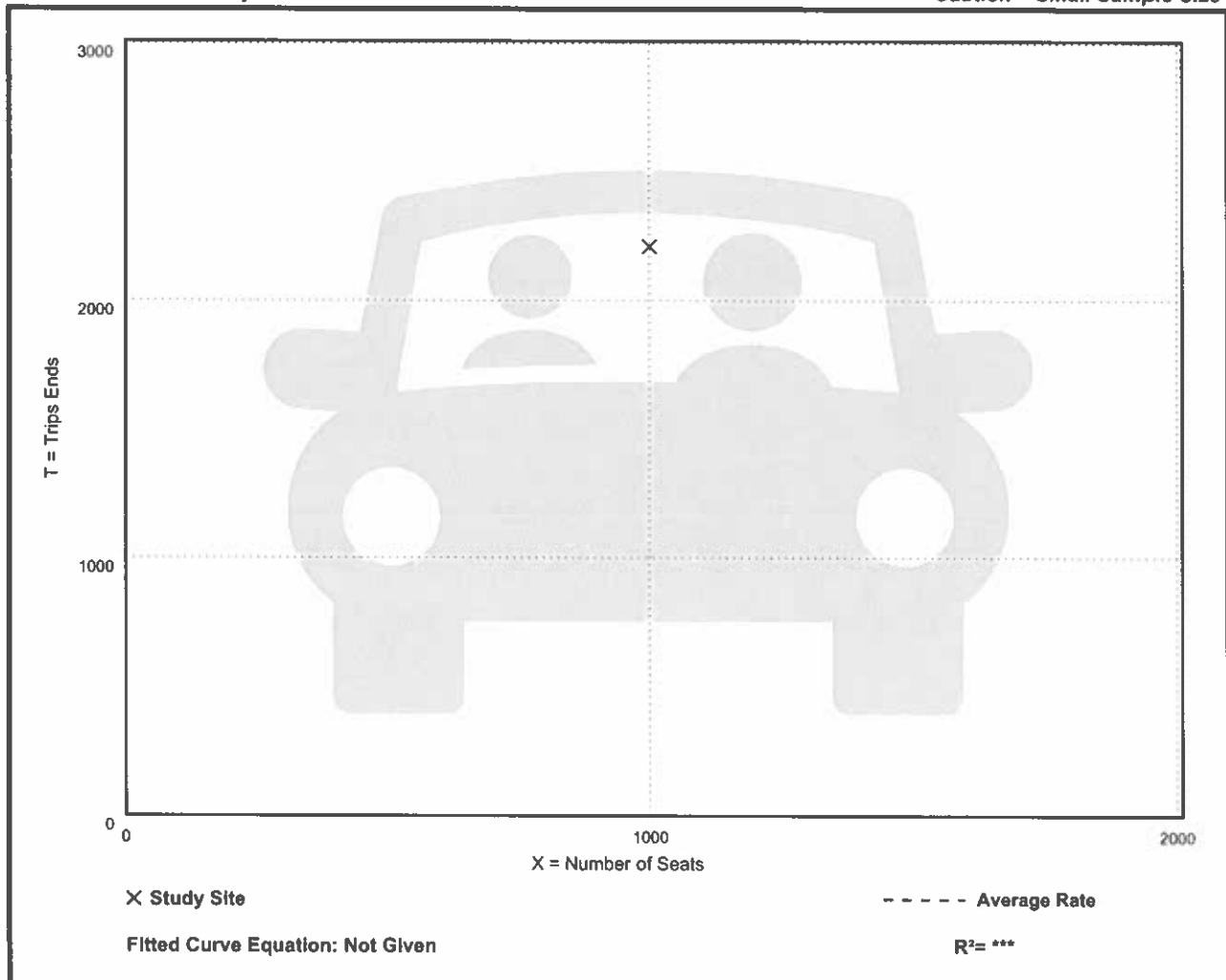
Setting/Location: General Urban/Suburban
Number of Studies: 1
Avg. Num. of Seats: 1000
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Seat

Average Rate	Range of Rates	Standard Deviation
2.21	2.21 - 2.21	***

Data Plot and Equation

Caution – Small Sample Size



Church (560)

Vehicle Trip Ends vs: Seats

On a: Sunday, Peak Hour of Generator

Setting/Location: General Urban/Suburban

Number of Studies: 12

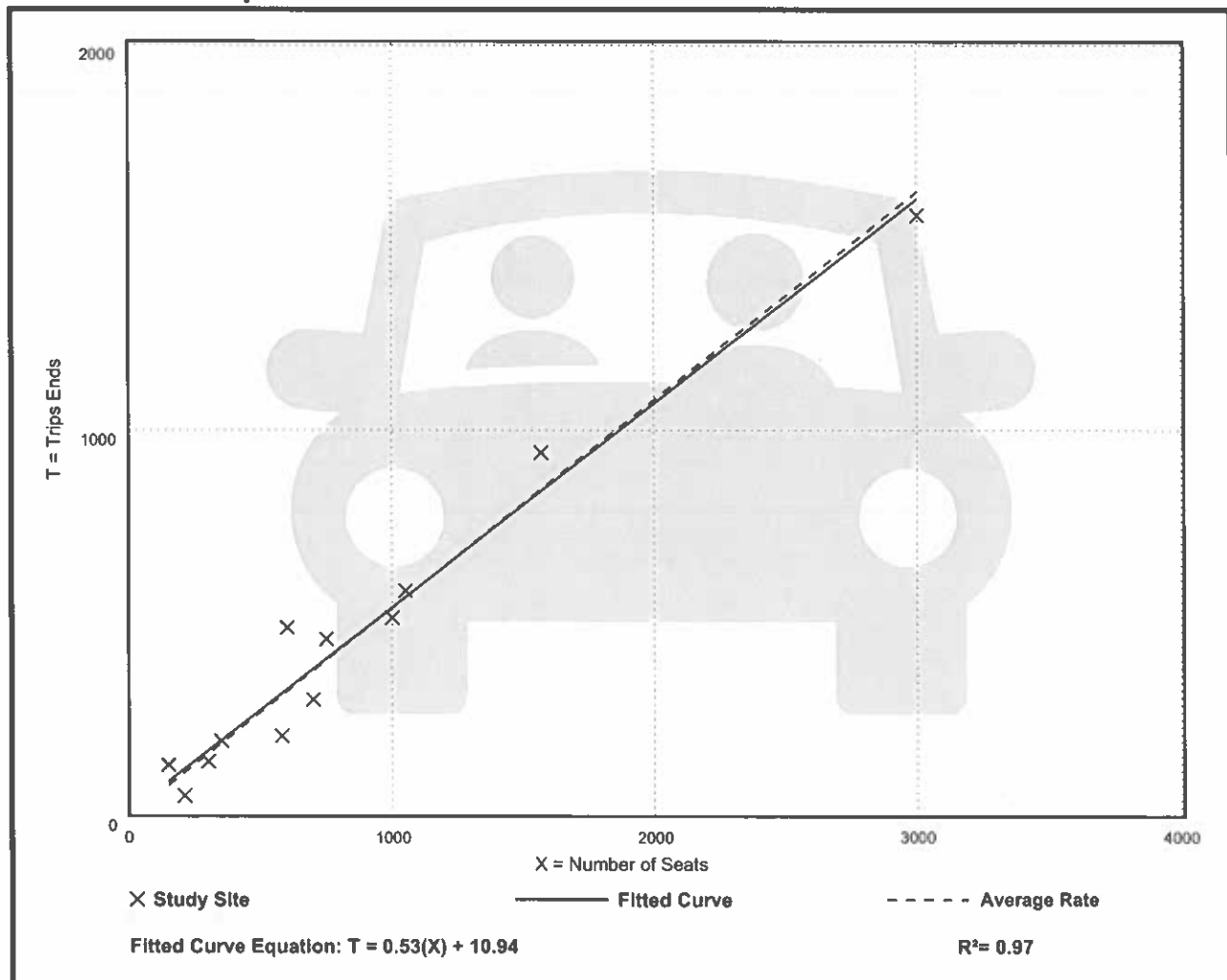
Avg. Num. of Seats: 855

Directional Distribution: 49% entering, 51% exiting

Vehicle Trip Generation per Seat

Average Rate	Range of Rates	Standard Deviation
0.54	0.25 - 0.89	0.11

Data Plot and Equation



Church (560)

Vehicle Trip Ends vs: **Attendees**
On a: **Weekday,**
AM Peak Hour of Generator

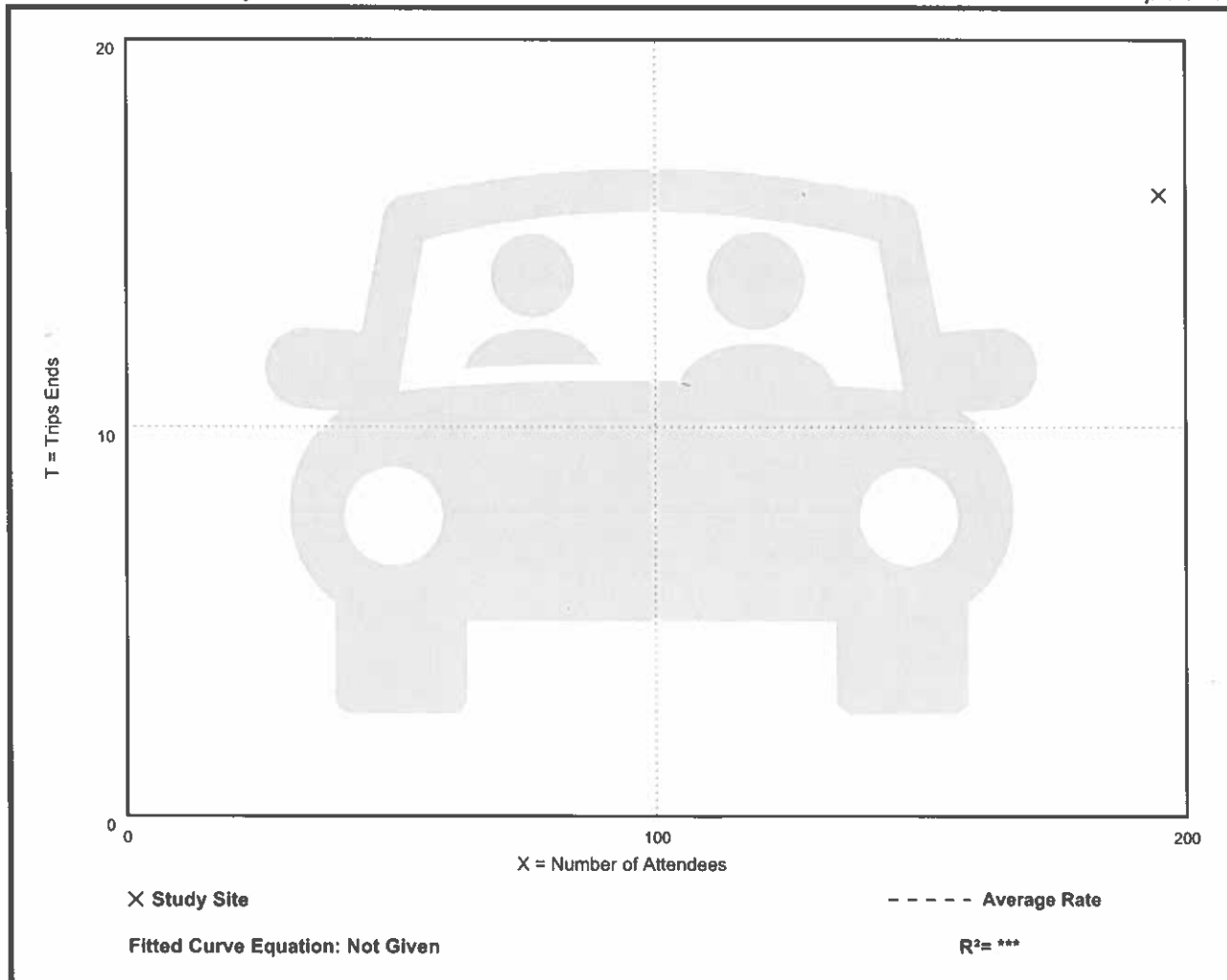
Setting/Location: **General Urban/Suburban**
Number of Studies: **1**
Avg. Num. of Attendees: **195**
Directional Distribution: **50% entering, 50% exiting**

Vehicle Trip Generation per Attendee

Average Rate	Range of Rates	Standard Deviation
0.08	0.08 - 0.08	***

Data Plot and Equation

Caution – Small Sample Size



applicant ref'd
during pres

LU-25-067 Northside Church Appeal – Applicant Materials for the Record

From Laura LaRoque <laura@pathfinderlanduse.com>

Date Mon 8/3/2026 7:23 PM

To RICHARDSON Bob <bob.richardson@bentoncountyor.gov>

 2 attachments (23 MB)

Northside Church Local Trip Study 8.3.26.sgn.pdf; Northside_CUP_BOC_Appeal_PPT_Final.pptx;

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Bob,

Attached are the following materials for the upcoming BOC hearing on the Northside Church appeal:

- Draft applicant PowerPoint presentation;
- Sandow Engineering's August 3, 2026, local trip study; and
- Draft revisions to Conditions P-12 and P-13.

The proposed revision to P-12 includes a shared-use path option and provides flexibility for the County Engineer to approve minor design modifications or dimensional adjustments necessary to accommodate right-of-way, topographic, drainage, utility, environmental, or other physical constraints. The proposed revision to P-13 corrects the cross-reference to Condition P-12 and clarifies that the required security is based on the full estimated cost of the improvements plus a 20 percent contingency.

Below are the revised draft Conditions P-12 and P-13 for the Board of Commissioner's consideration. **Bold text** indicates the proposed edits and additions.

I look forward to hearing your feedback and discussing how these proposed revisions can best be presented to the Board of Commissioners. Please feel free to reach out if you have any questions or would like to discuss the proposed changes further.

P-12. Road Improvements: The applicant shall survey, design, and construct roadway and pedestrian improvements to NW Powers Avenue between a point **approximately 50 feet west** of the westerly boundary of the subject property and Scenic Drive. **The final design shall be reviewed and approved by the Benton County Public Works Department and may consist of one or more of the following approaches:**

1. **Construction of a hybrid street section within the existing public right-of-way and the additional right-of-way dedicated by the applicant pursuant to Condition P-14.** The improvements shall generally consist of a 24-foot-wide Hot-Mix Asphalt Concrete (HMAC) paved section with two-foot crushed aggregate shoulders. The County Engineer may approve minor design modifications or dimensional adjustments where necessary to accommodate right-of-way, topographic, drainage, utility, environmental, or other physical constraints. Such adjustments may include localized reductions in shoulder width, minor roadway alignment modifications, adjustments to ditch slopes, or other minor dimensional changes;

2. Construction of a separate eight-foot-wide shared-use path behind the roadside ditch, if the applicant voluntarily obtains the easement or additional right-of-way necessary for its construction; or
3. A combination of these approaches, consisting of roadway improvements where they can be accommodated within the available public right-of-way and an eight-foot-wide shared-use path for the remaining segment, if the applicant voluntarily obtains any easement or additional right-of-way necessary for the shared-use path.

Compliance with this condition shall not require the applicant to obtain an easement or additional right-of-way from a neighboring property owner. If the applicant is unable to obtain property rights necessary for a shared-use path, the applicant shall satisfy this condition through roadway improvements within the available public right-of-way, subject to the minor design modifications authorized above. All improvements shall substantially achieve the intended roadway and pedestrian safety objectives and comply with applicable engineering standards to the greatest extent practicable.

4. The asphalt and crushed aggregate base (CAB) thickness for roadway widening shall comply with the Primary Local Road Standards and consist of three inches of HMAC over ten inches of CAB.
5. The applicant shall design and construct NW Powers Avenue drainage ditches, stormwater conveyances, detention or treatment facilities, and connections to off-right-of-way conveyances necessary to accommodate runoff in accordance with Benton County Development Code Chapter 99 and applicable ODOT standards, details, and methodologies.
6. The applicant shall provide calculations, designs, and specifications for all proposed public infrastructure to Benton County Public Works for review and approval.
7. Construction and post-construction stormwater discharge shall conform to Oregon Drainage Law and all applicable Oregon Department of Environmental Quality and Benton County stormwater requirements, erosion and sediment control details, and best management practices.

P-13. Road Improvements or Security: Prior to issuance of operating approval, the applicant shall fulfill ONE of the following TWO options for the improvements required by Condition P-12:

1. Construct the required improvements; OR
2. Enter into an Agreement for Improvements (AFI) with Benton County. The AFI shall require security for the full **estimated** cost of the work plus a 20 percent contingency. Security may take the form of a bond, conditional irrevocable line of credit, or cash deposit and shall ensure completion of the required improvements within 18 months after execution of the AFI.



Laura LaRoque | Land Use Consultant

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Andrew G. Biddle
4853 NW Dumbeck Ave
Albany, OR 97321

July 24, 2026

Benton County Board of Commissioners

Re: LU-25-067 — Northside Christian Church CUP appeal

Dear Commissioners,

I am a Benton County resident who lives in the immediate vicinity of the subject parcel. I am not an attorney. I am writing about the applicant's claim that denying this permit would violate the federal Religious Land Use and Institutionalized Persons Act (RLUIPA).

I have read the leading Oregon case on this question, and the standard is narrower than the applicant suggests. Under *Corp. of Presiding Bishop v. City of West Linn*, 338 Or 453 (2005), a county only creates a "substantial burden" if its decision forces a church to give up an actual religious practice in order to obtain a permit. Added cost, delay, or having to look at a different site does not meet that bar. The Court of Appeals said as much in *Timberline Baptist Church v. Washington County*, 211 Or App 437 (2007), where it upheld a county's denial of a church school. The applicant, not the County, has to prove the burden exists.

More than anything, I would ask the Board to put its reasoning in writing. Specifically, please make findings that:

1. The County applied the same written standards it would apply to any other applicant;
2. The applicant has not explained which of its site requirements are religious rather than practical or financial;
3. Nothing in the record shows denial would require the applicant to give up a religious practice; and
4. The County treated the applicant fairly, with no hostility toward its religion and no unusual delays.

Whatever the Board decides, clear findings on these points will make the decision much harder to overturn later. Thank you for your service and for considering this.

Respectfully,

Andrew G. Biddle
4853 NW Dumbeck Ave, Albany, OR 97321

Josanna Biddle-Croco and Andrew Biddle

4853 NW Dumbeck Ave
Albany, OR 97321

23 July 2026

Benton County Board of Commissioners

landuseappeals@bentoncountyor.gov.

LU-25-067

Dear County Planners,

Please verify the parking requirement from "LU-25-066 & LU-25-067 Northside Church Staff Report".

In reading the BCC 91.605 Off Street Parking (Exhibit 1) and reviewing the proposed facility shown in Northside Schematic Design (Attachment 1) it appears that the building's footprint was mistakenly used in place of the gross floor area in the staff report. Benton County Building Code 11.155 (Exhibit 2) adopts The Oregon Structural Speciality Code which defines gross floor area in Chapter 2 Section 202 (Exhibit 3).

Using the definitions in the code, the gross floor area includes the first floor (110'-3" by 171'-7" = 18,917 square feet) and second floor (110'-3" by 87'-3" = 9,619 square feet).

$18,917 + 9,619 = 28,536$ square feet gross floor area

To calculate the required parking stalls per BCC 91.605 (Exhibit 1):

$28,536 \text{ square feet} \times 1 \text{ parking space} / 100 \text{ sq feet} = 285 \text{ parking stalls}$

To comply with BCC 91.605 the permit application must include 285 parking stalls

This revised parking requirement makes sense when you consider the building plan (Attachment 1) that shows sanctuary seating for 478 people plus four separate care rooms for infants (occupancy 11), toddlers (occupancy 18), preschool (occupancy 26), and elementary (occupancy 31). During a packed service we may need to park enough vehicles for Pastor (1) + Congregation (478) + Infants (11) + Toddlers (18) + Preschool (26) + Elementary (31) = 565 total people. This is assuming that during service no one is in the reception, fellowship room, kitchen, three separate offices, break room, or two flex halls (occupancy limits 147 and 118).

Due to the rural nature of this site there is no on-street parking, no public transit, and walking or biking is only a faint possibility for a tiny portion of the congregation. No variance to the Benton County Parking Code (Exhibit 1) should be considered.

Sincerely,

Josanna Biddle-Croco and Andrew Biddle

Exhibit 1:

Benton County Development Code

BCC 91.605 Off-Street Parking.

Except as otherwise required by other provisions of the Development Code, structures built, enlarged or increased in capacity shall provide for the following off-street parking space requirements. Gross floor is that area considered to be habitable under the terms of the Benton County Building Code.

(5) A place of public assembly including church, stadium, arena, club, lodge, auditorium, meeting room, and undertaking establishment shall provide one (1) space for each 100 square feet of gross floor area or one (1) space for each eight (8) seats, whichever is greater.

Exhibit 2:

Benton County Building Code

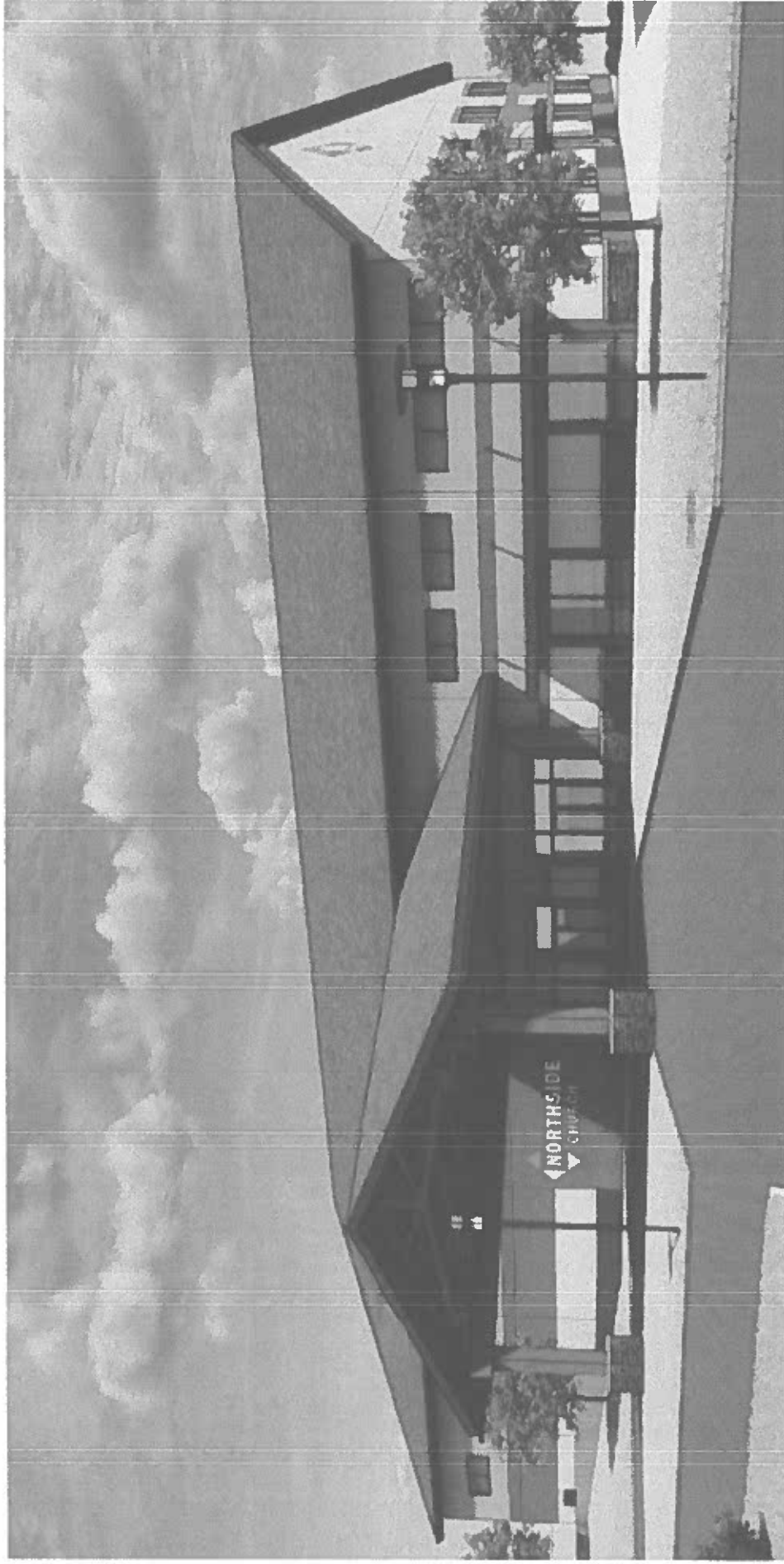
BCC 11.155 - Enforcement of State Code.

The Oregon Structural Specialty Code, as adopted by OSR 918-460-010 through 918-460-015, except as modified in this code, is enforced as part of this code.

Exhibit 3:

Oregon Structural Specialty Code (2025 ed.), Chapter 2, § 202

"FLOOR AREA, GROSS. The floor area within the inside perimeter of the exterior walls of the building under consideration, exclusive of vent shafts and courts, without deduction for corridors, stairways, ramps, closets, the thickness of interior walls, columns or other features. The floor area of a building, or portion thereof, not provided with surrounding exterior walls shall be the usable area under the horizontal projection of the roof or floor above."



VIEW FACING SOUTHEAST, GYMNASIUM BUILDING

NORTHSIDE CHURCH

SCHEMATIC DESIGN - EXTERIOR | DECEMBER 10, 2025

**Josanna Biddle-Croco, Jamie Harper, Vesper Biddle-Croco,
Matthew Croco, Andrew Biddle, & Ambrose Biddle-Croco**

4853 NW Dumbleck Ave
Albany, OR 97321

04 Aug 2026

Benton County Board of Commissioners

landuseappeals@bentoncountyor.gov

LU-25-067

Dear Commissioners,

LU-25-067 is missing important information regarding the septic system that should be resolved prior to approval.

The Septic Site Evaluation Approval (Staff Report Attachment B.108-111) states that septic demands for this large multipurpose facility exceeds the 2500 gallon per day limit, and will require a Water Pollution Control Facility Permit from ODEQ and is subject to Oregon Administrative Rules Chapter 340 Division 71.

OAR 340-71 requires both an "adsorption area" and a "replacement adsorption area". Looking at the latest site plan from Udell Engineering (Staff Report Attachment B.37), they have the septic field shown encroaching on required property boundary setbacks and did not designate space for the required "replacement (repair) absorption area". The septic studies show that the only place to put the absorption area is on the wooded hill (Staff Report Attachment B.111).

The applicant's engineers were clearly aware of the requirements. If you look at the original proposal (Staff Report Attachment B.114) you can see that both absorption area and replacement adsorption area were marked. Unfortunately, they were nestled between two seasonal streams in wetlands per the State of Oregon Department of Lands Statewide Wetlands Inventory <https://maps.dsl.state.or.us/swi/> (Exhibit 1). Per the Oregon Department of State Lands:

These soils often exhibit characteristics (e.g. "routinely flooded") that meet the definition of, and are designated as "hydric soils." (Exhibit 2)

OAR 340-071-0520 requires that effluent from large systems be distributed to an adsorption area divided into multiple relatively equal cells by means of at least two pumps per system. It also notes that the replacement (repair) absorption area must be divided into relatively equal units, with a replacement absorption area unit located adjacent to an initial absorption area unit. Effluent distribution must alternate between the absorption area units (Exhibit 3).

The proposed septic system will require around half an acre cleared down to grass for the 'absorption area' and 'replacement absorption area'. Additionally, they will need to clear a

corridor to bury piping from the septic storage tanks to the absorption area on the hill. Electrical will need to be run for the pumping stations to move the effluent up the 30-50 foot tall hill and for the adsorption area switching station. This work will necessitate moving large equipment up the hill which likely widens the clearance corridor.

The submitted landscaping plan (Staff Report Attachment B.118-122) indicates "existing landscaping to remain" and "existing trees to remain". This is clearly impossible.

The submitted site plan is missing major elements that should be considered prior to approval:

1. Corrected placement of the adsorption area to comply with setbacks
2. Placement of the required adjacent "replacement (repair) absorption area"
3. Location of the piping and electrical corridor (under a stream and up a hill)
4. Placement of pumping stations and the adsorption area unit switching facility
5. Access road(s)
6. Updated landscaping plan accounting for clearing the forested area
7. Updated water management (runoff) plan for the newly cleared hillside

Please do not approve LU-25-067 until adequate information is provided.

Sincerely,

**Josanna Biddle-Croco, Jamie Harper, Vesper Biddle-Croco,
Matthew Croco, Andrew Biddle, & Ambrose Biddle-Croco**

P.S. We are concerned that the wetlands situation has not been adequately addressed. The multi-use building is sited on top of the Statewide Wetlands Inventory's designated area of predominantly hydric soils. Per Redmond Geotechnical Services (Staff Report Attachment B.69) ground water is located 1-5 feet beneath existing surface grades and "ponding of surface water" was observed across the lower southerly portion of the site. This septic system will increase runoff from the hillside both by clearing trees and by adding effluent to the soil.

Exhibit 1:

State of Oregon Department of Lands Statewide Wetlands Inventory <https://maps.dsl.state.or.us/swi/>

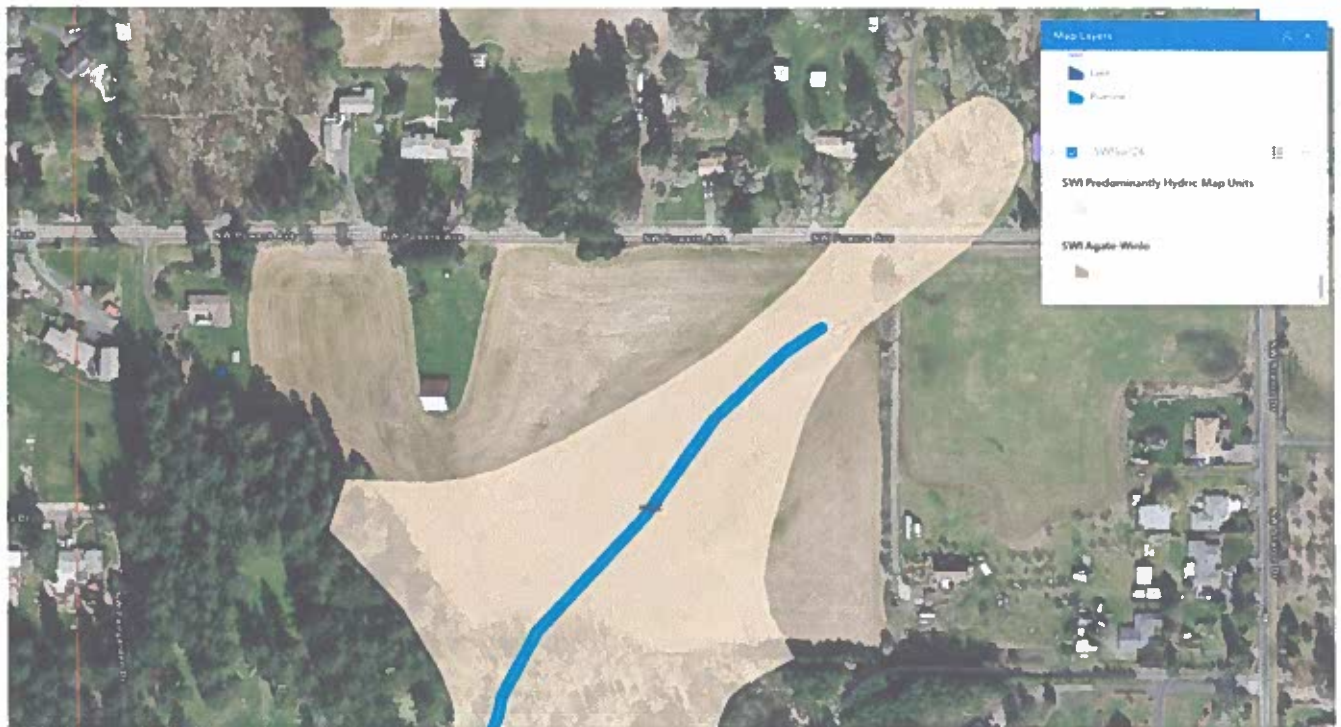
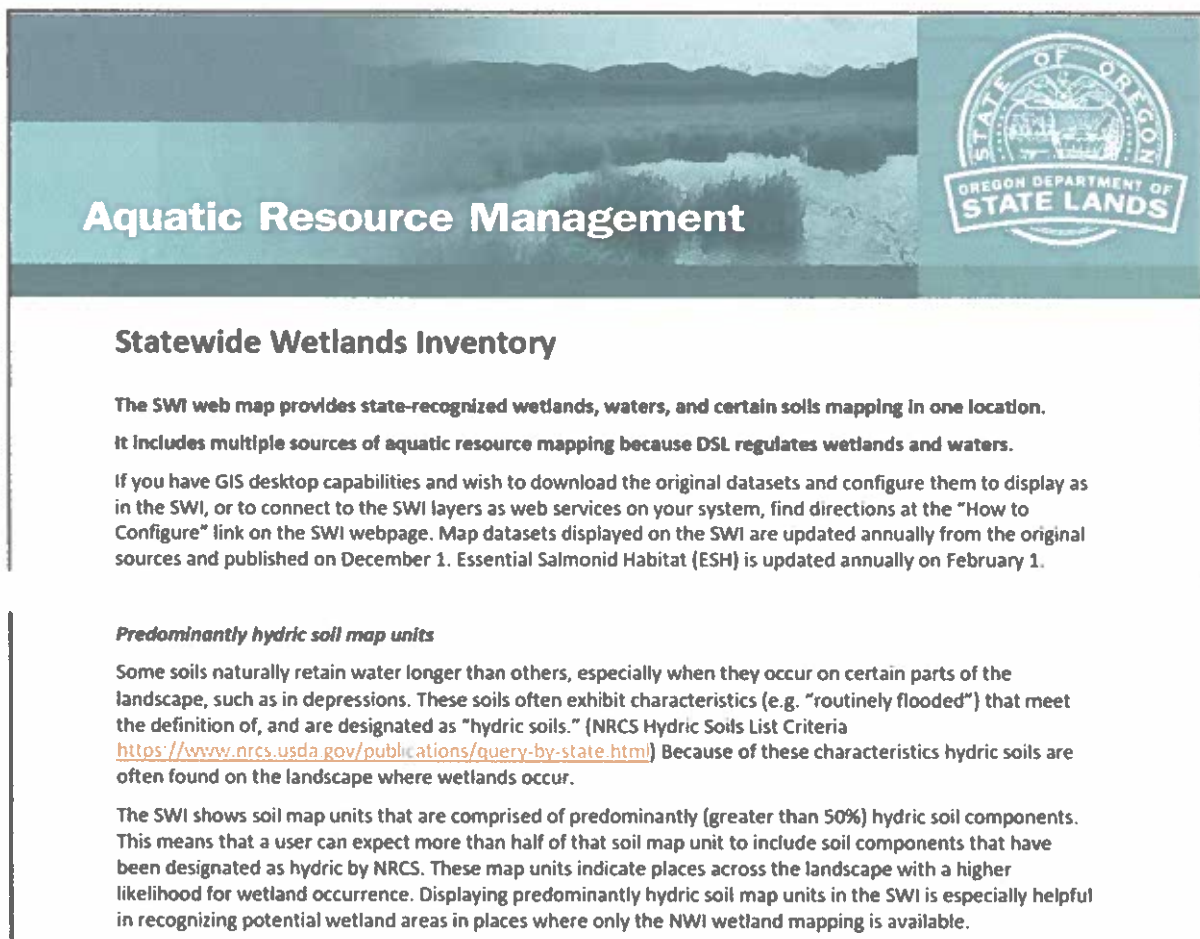


Exhibit 2:

https://www.oregon.gov/dsl/wetlands-waters/Documents/DSL_SWI_LayerLimitationsFinal.pdf

The graphic features a teal background with a landscape image of a wetland. On the right side, there is a circular seal for the Oregon Department of State Lands. The seal contains the text "STATE OF OREGON" at the top and "OREGON DEPARTMENT OF STATE LANDS" at the bottom, surrounding a central emblem. The main title "Aquatic Resource Management" is written in white, bold, sans-serif font across the middle of the teal section. Below this, the subtitle "Statewide Wetlands Inventory" is written in black, bold, sans-serif font. The body text is in a smaller, black, sans-serif font, providing information about the Statewide Wetlands Inventory (SWI) web map, its data sources, and its use in recognizing potential wetland areas.

Aquatic Resource Management

Statewide Wetlands Inventory

The SWI web map provides state-recognized wetlands, waters, and certain soils mapping in one location. It includes multiple sources of aquatic resource mapping because DSL regulates wetlands and waters.

If you have GIS desktop capabilities and wish to download the original datasets and configure them to display as in the SWI, or to connect to the SWI layers as web services on your system, find directions at the "How to Configure" link on the SWI webpage. Map datasets displayed on the SWI are updated annually from the original sources and published on December 1. Essential Salmonid Habitat (ESH) is updated annually on February 1.

Predominantly hydric soil map units

Some soils naturally retain water longer than others, especially when they occur on certain parts of the landscape, such as in depressions. These soils often exhibit characteristics (e.g. "routinely flooded") that meet the definition of, and are designated as "hydric soils." (NRCS Hydric Soils List Criteria <https://www.nrcs.usda.gov/publications/query-by-state.html>) Because of these characteristics hydric soils are often found on the landscape where wetlands occur.

The SWI shows soil map units that are comprised of predominantly (greater than 50%) hydric soil components. This means that a user can expect more than half of that soil map unit to include soil components that have been designated as hydric by NRCS. These map units indicate places across the landscape with a higher likelihood for wetland occurrence. Displaying predominantly hydric soil map units in the SWI is especially helpful in recognizing potential wetland areas in places where only the NWI wetland mapping is available.



Exhibit 3:

OAR 340-071-0520 Large Systems

Unless DEQ authorizes otherwise, large systems must comply with the following requirements.

- (1) Large system absorption facilities must be designed with distribution to the cells by means of pumps.
- (2) The absorption area must be divided into relatively equal units. Each unit may receive no more than 1300 gallons of effluent per day.
- (3) The replacement (repair) absorption area must be divided into relatively equal units, with a replacement absorption area unit located adjacent to an initial absorption area unit.
- (4) Effluent distribution must alternate between the absorption area units.
- (5) Each system must have at least two pumps.
- (6) The applicant must provide a written assessment of the impact of the proposed system on the quality of public waters and public health, prepared by a registered geologist, a certified engineering geologist qualified as a hydrogeologist, or a subordinate under the direction of either, except as specifically exempted in ORS 672.535.
- (7) The owners of all new and existing large systems must register those systems with DEQ as Underground Injection Control (UIC) systems under OAR chapter 340, division 044. Large systems receiving domestic waste are regulated under this division. Drainfields receiving nondomestic waste are also regulated under the UIC rules.

Good afternoon. My name is Kevin Post, and I live on Terrace Drive, off of Powers. I share Northside's mission of reaching people with the gospel, but I am deeply concerned that they have become blind to the negative earthly impacts of their behavior. Ultimately, Pastor Jamie could be right that soul capacity is more important than square footage. But both of these matter when evaluating whether new construction threatens the safety of our families and the enjoyment of our property.

Rather than trusting their lawyers' filings which are unclear and contradictory as to the ^{size} scope of the project and what exactly will occur there, I reviewed Northside's weekly YouTube broadcasts to hear them in their own words. My full findings are in the record. (C.275)

During their capital campaign, a video was played for the congregation, featuring prominent church members explicitly citing looking forward to: "hosting crazy all-night events," "huge BBQs," and "concerts." Minutes later, the congregation was asked for money based on these promised uses. Other broadcasts mentioned "summer parties", "open gyms", "after school programs", "sports camps", and "24-hour access". I honestly can't tell whether this is a church or a YMCA with a chapel bolted onto it.

700 at Easter has been mentioned / Outreach events such as their Trunk-or-Treat bring "literally thousands of cars every year," with "a thousand people present... [not counting] the people that are coming and going", and "road parking completely all the way into the neighborhood". But this is not just about their annual events. Since 2022, Northside has explicitly directed its members to park illegally on Oak Grove so that guests can park on-site. This proves a years-long unmitigated reliance on a public right-of-way for overflow parking.

Also, every summer from June through September, they move services outdoors with a full amplified band. Condition O-4 currently allows outdoor amplified sound from 7 AM to 9 PM. This must be modified to include a clear standard such as 60 decibels at the property lines.

Condition P-12 requires a widened road – the county staff agrees that without it, our families are unsafe, yet Northside refuses to acquire the right-of-way to build it, and Public Works admits it 'may' not even fit within the existing space. "Maybe" is not substantial evidence. You cannot legally approve this permit on a road condition that the applicant ~~refuses to build and cannot~~ ^{did not} prove is even feasible. Without that road, Powers Avenue cannot safely handle this facility. This appeal must be DENIED because it violates County Code, state law, traffic safety caps, and common sense.

^{force us} Do not let Northside's lawyers bully our families into accepting unsafe driving conditions. Do not let Northside's lawyers bully our neighborhood into accepting outdoor concerts in a zone where an outdoor music venue would NEVER be approved. That application would be laughed out of the room. Our legal team is ready and willing to assist you in drafting findings for a denial that protect the County and our neighborhood.

Thank you.

To: Benton County Board of Commissioners
From: Angela Hendrickson
Date: August 4, 2026
RE: Opposition to LU-25-067 (Northside Church)

I live at 4890 Dumbeck Avenue. Our property is near the proposed development, and we border and contribute to the maintenance of Lakeview Lake, which is downstream from the wetlands on the Powers property. My husband, kids and I drive/walk/bike on Powers multiples times each day.

I did submit a letter in opposition to this proposal, which is included in your packet, so I won't rehash the same legitimate concerns that I and my neighbors share. But I spent substantial time this past week reading through the application materials, as well as all of the letters in support of and in opposition to the proposal. There were a few bullet points that stood out to me I'd like to highlight....

- First and most importantly - How large is the church building actually? I studied Business, not Engineering. But I do know Math, so I think I got these numbers right.... The notice of public hearing and staff report both say 18,902 square feet. The memo in the application from Northside, the memo from their attorney, and their site plans all say 18,902 square feet. The traffic study by Sandow Engineering is based on that number as well. However, the floor plans from Varitone Architecture (on pages 155 & 156 of the packet) submitted by the church show a total square footage of over 28,000 square feet. The square footage of just the lower floor of the building is around 18,900 square feet. This raises several questions – was the wrong floor plan submitted and there is actually an existing plan for the building to be 18,902 square feet? Has the county seen that floor plan? And if so, why isn't it part of the public packet? Or is the application and supporting materials based on the square footage of only the footprint of the building?
- My understanding is that the county traffic study was based on a 500-person capacity, assuming one service per Sunday. However, the church has stated their intent to offer two services each Sunday. Shouldn't the traffic study then factor in a capacity of 1000 people and related traffic?

I'm also curious that there's no recognition of the fact that Oak Grove Rd - a feeder to Powers - also has areas of no shoulder and how increased traffic will impact

I'm also concerned about the concern given about needing flexibility from the County to have smaller shoulders in some areas of the road.

- I'm concerned that if this project is approved, there are no guardrails in place regarding size and frequency of large events. Some letters in support referred to events held at Suburban Church as the type of community events that could be held at Northside to benefit the larger community. These events are fantastic in an Urban Residential area with adequate roads and public water and sewer access, like where Suburban Church is. But the neighbors in my Rural Residential area are very concerned about the impact that large events like this will have on the neighborhood, our roads, and our overall infrastructure. Once this church is built, there are no limits on the events that will happen there.
- Lastly, one letter stated that the group opposed to this project is "small in numbers" and are getting most of their support from outside of North Albany. It said the opposition to the proposal within North Albany is "overstated." When you read the letters and see the addresses of the homeowners, it shows that couldn't be further from the truth. Drive up Scenic, Oak Grove, Powers, Terrace, and Dumbeck roads and you will see "Save Powers" signs lining the street. We are a very large group of homeowners that live within close distance to this site and drive/walk/bike Powers every day, and we believe the character of our neighborhood will be impacted by this project.

Thank you for your time.

Cary Hoffer

Speech for Aug 4th Hearing

~~Good morning~~ and thank you for your time.

Reading through this appeal, the term that immediately comes to mind is arbitrary and capricious.

I want to remind you that you have the right to deny this application and here are a few of the reasons why I feel you should.

1- Northside's data is vague, misleading, and simply incorrect in many areas, and yet they have the capriciousness to release it as factual.

2- Vague in that it does not provide any detail. For example:

a. ~~septic solution~~ does not meet DEQ Chapter 340 Division 71 standards as it does not identify a backup/replacement area, which would appear to require many trees to be removed.

b. Our traffic engineer highlights several discrepancies in the study. Examples

- i. Benton County Mobility Standards Not Addressed
- ii. Driveway Spacing Requirement Not Met
- iii. Powers Ave Oak Grove Drive intersection Safety not addressed

c. Page 12: "...Outdoor activities will be limited to reasonable hours and managed to minimize disturbance to adjacent residents." How do they define reasonable?

rarely
I define it as outdoor activities that ~~cannot~~ be viewed from the street. There can be zero loud noises over 60 decibels.

Traffic will not alter my ability to drive, bike, or walk my dogs along the road. Just as I do now.

I also define reasonable hours in our neighborhood as between 8am and 6pm

OF NOTE- The field and surrounding area has 55DB. Readings at the Summer Festival were 123 DB – 10 times louder on average and 120 times at peak. 123 db = Jet airplane at takeoff – 55 = birds chirping, conversation

Given the church's behavior, I'm certain they see "reasonable" quite differently. Here is a past-present-future example

- a. Under Pastor Jamie's supervision, the submitted record contains stories of his youth group setting off improvised explosives and shooting water balloon launchers at 3 AM, resulting in SWAT and police calls".
- b. Apx 2 weeks ago Benton county Sherrif spoke with Pastor Jamie, regarding the theft of our neighborhood's "opposition signs" being stolen (15 in 12 days)
- c. Opening admitting how excited members of the congregation is to have all night parties once the campus is built.

None of this is remotely close to meeting 53.215 in that it most definitely and seriously interferes with the adjacent property, the character of the area, and the purpose of the zone.

3- Examples of incorrectness

Page 14 Northside incorrectly stated the square foot size of the building stating that it is 18,917, however they neglected to include the second floor adding and additional 9,619 making it 28,536 square feet.

In doing so it miscalculated the parking space requirements and instead of 260 spaces, it should be 285 per BCC 91.605

4- Our traffic study indicates the road needs to be widened resulting in

a. Removal of

9 fences

108 mature trees

90 feet of a 10 foot hedge

b. Required to be moved

Buried utility lines would need to be moved on both sides of the road

2 fire hydrants

15 power poles

22 mailboxes

Our attorney (Sean Malone as well as many members of our neighborhood are very willing to prepare findings for this denial.

*19,000 → 28,536
As has been stated*