

PO Box 1633
Saint Helens OR 97051

Columbia County Land Development Services
Attn: Jake Renney
230 Strand Street
Saint Helens, OR 97051

Via e-mail – Jake. Renney@columbiacountyor.gov.

RE: File # DR 24-01

Dear Mr. Renney,

I am the home owner at 34555 Church Road, almost directly across from this proposed construction (File DR 24-01). I opposed the re-zoning back in 2018 and oppose the construction of the school as proposed. I address specific concerns below, referenced to your extensive staff report, file number DR 24-01, dated September 20, 2023, site design review. Several concerns listed below.

The proposed drainage mitigation. The storm water report done by Lower Columbia Engineering, dated July 18, 2023 has very nicely done graphs & equations. They seem to assume an average type distribution of rainfall. From personal experience that does happen much of the time. However, there are frequent events where one of two things occur.

- 1) Event one. It rains in steady fashioned as modeled. The ground slowly becomes saturated and the grey clay underlying much of the Aloha variant loam swells like Bentonite, reducing the perc rate. It does still perc. Then we have a massive rainfall event, such as occurred in December of 2022. Since much of the northern side of the parcel in question does not have a surface drainage path, you have ponding. This has been observed in December of 2022, as well as other times. I doubt if the December 2022 qualifies as a 100-year event, as both February of 1996 and late December of 1964 were much more significant precipitation events.
- 2) Event two. The other problem that you have is a “rain on snow flood.” This is by far a worse event. This happened in February 1996. As you know you basically have rain, ground saturates, it gets very cold, freezes and then we have snow coming down. Then that is followed by a “Pineapple Express type” type event. I am sure you recall the sand bagging efforts in downtown Portland along the top of the sea wall. In Columbia County things were bad, with parts of Highway 30 closed. The following clip from a 2017 Saint Helens Chronicle article describes what occurred – “As rains drench northwest Oregon and streams rise, longtime county residents may remember an event twenty-one years ago that decimated Columbia County, causing millions of dollars in damage. People remember it as the great flood of '96. Three days of torrential rains melted mountain snowpack causing already swollen streams to overflow their banks and do widespread damage throughout the county. At the time, officials designated it the most severe flooding in 30 years. Rain began falling Feb. 6, 1996. Between 6 a.m. Tuesday and 6 a.m. Thursday, nearly eight inches of rain reportedly fell in the St. Helens area.”
- 3) Speaking with neighbors resident in 1996, Warren Creek ran over the top of Church Road. If a similar level is reached when school structures are constructed as proposed, they will likely be flooded. This may make it difficult for the owner to obtain flood insurance, even if the area in

question is not in a designated FEMA flood plain. In the interests of full disclosure the insurance underwriter should be informed of these concerns and the accompanying photographic evidence (please see below).

- 4) December of 1964 saw much worse flooding. This link provides a great description of the flooding event; page 20 focuses on our geographical area of concern. <https://pubs.usgs.gov/wsp/1866a/report.pdf> This a worse situation than 1996. If this were to occur in the future, it would seem to me that the inadequateness of the proposed construction and water mitigation plan would result in structural damage. Perhaps rethink the proposition or I would recommend considering having the structures up on stilts, perhaps 5 feet tall. It will save a lot on the insurance money for the school.
- 5) Looking at page 3 of the storm water report, a figure of 4.00" is used for a 100-year event. It appears we have "100-year storm events" every 30 years or less (1996, 1964, 1955). And they frequently involve repeated individual precipitation events over a period, leaving the ground saturated, with subsequent ponding occurring. Unless the perc rate of a swale is better than the current unimproved land, you will have an event leading to submergence of the proposed structures. Please see photographs.
- 6) Calculation. Looking at the unimproved area in December of 2022, you can see an area covering at least 120 feet across to an average depth of 1 foot (deeper in the center shallower towards the edges – please see contour map provided by the engineering consulting firm, LCE). A rough calculation gives a figure of better than 10,000 cubic feet of water ponded. The north and south swale have a combined capacity of 7,518 cubic feet, obviously insufficient to deal with this amount of precipitation deposited in December of 2022. Perc rate was empirically not sufficient to mitigate this effect, and December of 2022 was NOT a huge event. This empirical observation is at variance to finding 47, "Runoff from the 100-year storm may leave pipes and channels, but shall not rise to elevations more than one (1) foot below that of the lowest finished floor of buildings."

Photographs – December 2022





As far as traffic mitigation. The school admits there is a problem (please see their description of efforts to reduce the impact on traffic flow) and they make a wonderful argument that no change in the number of vehicles will result from this construction. Two points to consider with this –

How did the current traffic problem evolve in our quiet country neighborhood? The following clip from the school's website reveals how this likely came about – “When the building was sold to a public charter school in May 2007, we negotiated a building site behind Warren Community Fellowship (WCF) church in Warren, Oregon, raised \$350,000 in funding in donated labor/materials, and witnessed true miracles as the Lord opened and closed just the right doors for us to complete construction at WCF in less than three months. CCCS began serving full day K through 8th grade at WCF as of September 2009. In 2011, CCCS added 9th grade and received our full K-12 accreditation with NWAC. “It is obvious what happened – started small (Kindergarten through 8th grade) in 2009, 2011 added 9th grade, followed by full K-12

grades. Each of these can be assumed to have increased the number of students as grades were added and likely additional students added over time. We thus end up with the current enrollment and concomitant traffic problem. This begs two questions – how was this allowed to occur? None of the neighbors received any notification of the increase in students and car traffic. Was the county asleep or was the county simply not informed? And the larger question – in their application there is a line about future expansion – will any traffic review occur then? Only makes a bad situation worse. I would like a response as to how this was allowed to occur. How did the county fail to mitigate this obvious and admitted traffic problem.

Another key objective of the county planning commission is to preserve the ambiance and character of the current neighborhood. There are two churches within a short walk of the proposed school site. None of these have associated schools with them, and they do not produce work week traffic as does the current school. A look at the residences surrounding the proposed school site shows that all are foundation stick-built houses. NONE are double wide or triple wide construction (there a few such structures in the neighborhood – none abut the proposed school site). The proposed construction is NOT consistent with the character of the area.

Picture showing current winter time character of neighborhood –



It is also not consistent with the finding 9. A private religious school is NOT the same as numerous churches (two plus the one associated with this proposed school). Neither of the other churches have an associated school with them (Sunday school excepted). The comment from a “nearby property owner,” Leo Stoddard of Warren Professional Building, LLC, states “We were notified of this public hearing for Columbia County Christian School (File #DR24-01). We are writing to let you know that we are in support of this project and are very excited to see this school expand in our neighborhood. The services they offer to our community and children is greatly appreciated and we hope that the County aids in this

building project.” A quick perusal of the county tax records shows Leo owning a property on Hazen Road, quite a distance from the proposed school. Who generated the description of “nearby property owner”?? Perhaps he is renting something closer? Most dis-interested persons would not regard something as far away as Hazen Road as “nearby”.

Proposed illumination. Finding 25. “The submitted illumination plan shows that the parking lot will be provided with adequate lighting coverage. Per the mapped lighting coverage contours, the proposed lighting will not interfere with adjacent properties or create traffic hazards.” If said lighting interferes with adjacent properties, who is held liable? The county or the school? I for one like the darkness of the country side. Given the slippage on the growing traffic, as described above, I can see this being an ignored issue down the road.

Another future area of concern, not directly related to the building plans, is the future use of the current site of the school. Moving or dismantling the current structures leaves a nice parcel of land for future development. Will the county be involved in the planning for this or will it be similar to what transpired to produce the current traffic problems? A little here, a little there adds up traffic wise.

I realize land development services exists to develop land in Columbia County. I would feel better if some of my tax dollars were to go to preserving the character of the neighborhood as described in your directive. I would appreciate responses to questions listed above.

Thank You,

Steve Pfeiffer