

**TO:** Peter Domine, Planner II  
Community Planning and Development Department

**FROM:** Laurel Christian, Infrastructure Planner III  
Community Planning and Development Department

**DATE:** September 10, 2024

**SUBJECT:** **Infrastructure Memo**  
**SPR-ADJ-DAP-DR24-27 (24-103565-PLN)**  
**676 17<sup>th</sup> Street SE**  
**12-unit Multi-family Development**



## **PROPOSAL**

A consolidated application for a Class 3 Site Plan Review, Class 2 Driveway Approach Permit, and Class 1 Design Review for development of a 12-unit multi-family apartment complex, with eight Class 2 Adjustment requests. The subject property is 0.4 acres in size, zoned RM-II (Multiple Family Residential), and located at 676 17th Street SE (Marion County Assessor's Map and Tax Lot: 073W26CD / 4401).

## **RECOMMENDED CONDITIONS OF APPROVAL - SITE PLAN REVIEW**

1. Required right-of-way dedications shall be free and clear of encumbrances and liens unless an adjustment to SRC 200.050(d) is approved.
2. Design and construct a storm drainage system at the time of development in compliance with *Salem Revised Code* (SRC) Chapter 71 and *Public Works Design Standards* (PWDS).
3. Dedicate an Open Channel Drainage Easement along Shelton Ditch on the subject property. In accordance with PWDS, the easement width shall be either 15 feet from the channel centerline, or 10 feet from the top of the recognized bank, whichever is greater.
4. Convey land for dedication to equal a half-width right-of-way of 30- feet on the development side of Oak Street SE.
5. Provide streetscape improvements along Oak Street SE, including a 5-foot curblane sidewalk, curb ramp upgrades at the intersection of 17<sup>th</sup> Street SE and Oak Street SE, and street lighting along the property frontage as specified in the City Street

Design Standards and consistent with the provisions in SRC Chapter 803.

6. Prior to issuance of a certificate of occupancy, install street trees to the maximum extent feasible along 17<sup>th</sup> Street SE.
7. Prior to issuance of a Building Permit, the applicant shall obtain a Revocable License to Encroach from the Public Works Director for the private improvements within the public alley which establishes that the applicant shall maintain all private improvements within the alley.
8. Prior to issuance of a building permit, the applicant shall submit a site plan that demonstrates compliance with Vision Clearance Standards established in SRC Chapter 805 for street and driveway intersections.
9. Provide a no-rise certification from a registered professional civil engineer demonstrating through hydrologic and hydraulic analyses performed in accordance with standard engineering practice that the proposed floodway encroachment shall not result in any increase in flood levels during the occurrence of the base flood discharge pursuant to SRC Chapter 601.

#### **RECOMMENDED CONDITIONS OF APPROVAL –DRIVEWAY APPROACH PERMIT**

10. Prior to issuance of a building permit, the applicant shall submit a site plan that demonstrates compliance with Vision Clearance Standards established in SRC Chapter 805 for the driveway approach onto Oak Street SE.
11. The gate for the driveway approach onto Oak Street SE shall be setback approximately 18-feet from the back of the curb of Oak Street SE or the plans shall be revised to eliminate the gate.

#### **EXISTING CONDITIONS – INFRASTRUCTURE**

The existing conditions of streets abutting the subject property are described in the following table:

<b>Streets</b>			
<b>Street Name</b>		<b>Right-of-way Width</b>	<b>Improvement Width</b>
<b>17<sup>th</sup> Street SE (Minor Arterial)</b>	Standard:	72-feet	46-feet
	Existing Condition:	92-to-108-feet	62-to-72-feet
<b>Oak Street SE (Local)</b>	Standard:	60-feet	30-feet
	Existing Condition:	50-to-60-feet	42-feet
<b>Unnamed Alley</b>	Standard:	10-to-20-feet	10-to-20-feet
	Existing Condition:	16-feet	Unimproved

The existing conditions of public infrastructure available to serve the subject property are described in the following table:

Utilities & Parks	
Type	Existing Conditions
Water	Water Service Level: G-0
	A 4-inch water main is located in 17 <sup>th</sup> Street SE.
	An 8-inch water main is located in Oak Street SE.
Sanitary Sewer	An 8-inch sanitary sewer main is located in 17 <sup>th</sup> Street SE.
Storm Drainage	A 12-inch storm main is located in 17 <sup>th</sup> Street SE and Oak Street SE.
Parks	The proposed development is served by Aldrich Park one-quarter mile north of the subject property.

### **SITE PLAN REVIEW DECISION CRITERIA**

The following Code references indicate the criteria that must be found to exist before an affirmative decision may be made. The applicable criteria and the corresponding findings are as follows:

#### **SRC 220.005(f)(3)(A) The application meets all applicable standards of the UDC (*Unified Development Code*)**

**Finding**—As proposed and conditioned in the findings within the memo, the development meets all the applicable standards in the UDC as follows:

#### ***SRC Chapter 200 - Urban Growth Management:***

SRC Chapter 200 (Urban Growth Management) requires issuance of an Urban Growth Preliminary Declaration (UGA) prior to development of property located outside the City's Urban Service Area.

**Finding:** The subject property is located inside the Urban Service Area and adequate facilities are available. No Urban Growth Area permit is required.

#### ***SRC Chapter 200.050(d) - Acquisition of property, easements, and right-of-way:***

SRC 200.050(d) requires that right-of-way dedicated to the City be free of encumbrances and liens.

**Finding:** As described in the analysis of SRC Chapter 803 below, right-of-way dedication is required along Oak Street SE. There is existing overhead power that extends along the eastern property boundary. It is unclear from the information provided

if PGE has existing easements over these overhead power lines that would conflict with the required dedications. As a condition of approval, the applicant shall ensure required right-of-way is unencumbered, obtain quitclaims from private utility owners where there are conflicts, or receive an adjustment to this standard per SRC 200.050(d). The following condition applies:

**Condition:** Required right-of-way dedications shall be free and clear of encumbrances and liens unless an adjustment to SRC 200.050(d) is approved.

***SRC Chapter 71 – Stormwater:***

The proposed development is subject to SRC Chapter 71 and the revised Public Works Design Standards (PWDS) as adopted in Administrative Rule 109, Division 004.

**Finding:** The proposal is required to management stormwater by the use of green stormwater infrastructure for treatment and detention of stormwater generated by the development. The proposed plan demonstrates compliance with PWDS Appendix 4E related to green stormwater infrastructure by setting aside at least ten percent of the total new impervious surface area for installation of green stormwater infrastructure. The applicant's engineer shall design and construct a storm drainage system at the time of development in compliance with SRC Chapter 71 and PWDS.

**Condition:** Design and construct a storm drainage system at the time of development in compliance with *Salem Revised Code* (SRC) Chapter 71 and *Public Works Design Standards* (PWDS).

***SRC 802 – Public Improvements:***

▪ ***Development to be served by City utilities:***

SRC 802.015 requires development to be served by City utilities designed and constructed according to all applicable provisions of the Salem Revised Code and Public Works Design Standards (PWDS).

**Finding:** Public water, sanitary sewer, and stormwater infrastructure is available along the perimeter of the site and appears to be adequate to serve the property as shown on the applicant's preliminary utility plan. The applicant shall design and construct all utilities (sewer, water, and storm drainage) according to the PWDS and to the satisfaction of the Public Works Director.

▪ ***Watercourses:***

SRC 802.030 requires dedication of public improvement and maintenance easements for watercourses.

**Finding:** Shelton Ditch runs along the southern property boundary. Pursuant to SRC 802.030(b) and the PWDS 1.8(d), the application is subject to open channel drainage easements to be dedicated along the creek, allowing for access and maintenance. The easement width shall be either 15-feet from the channel centerline, or 10-feet from the top of the recognized bank, whichever is greatest.

**Condition:** Dedicate an Open Channel Drainage Easement along Shelton Ditch on the subject property. In accordance with PWDS, the easement width shall be either 15 feet from the channel centerline, or 10 feet from the top of the recognized bank, whichever is greater.

### ***SRC 803 – Street and Right-of-way Improvements***

#### **▪ *Boundary Street Improvements***

Pursuant to SRC 803.025, except as otherwise provided in this chapter, right-of-way width and pavement width for streets and alleys shall conform to the standards set forth in Table 803-1 (Right-of-way Width) and Table 803-2 (Pavement Width). In addition, SRC 803.040 requires dedication of right-of-way for, and construction or improvement of, boundary streets up to one-half of the right-of-way and improvement width specified in SRC 803.025 as a condition of approval for certain development.

**Finding:** 17<sup>th</sup> Street SE abuts the subject property along the western property boundary and is classified as a minor arterial street according to the Salem Transportation System Plan (TSP). 17<sup>th</sup> Street SE meets the minimum right-of-way width and pavement width standards established in SRC 803.025; therefore, additional improvements along 17<sup>th</sup> Street SE are not required.

Oak Street SE abuts the subject property along the northern property boundary and is classified as a local street according to the Salem Transportation System Plan (TSP). Oak Street SE meets the minimum improvement width standards for a local street but has inadequate right-of-way. The ultimate right-of-way width for a local street is 60 feet according to SRC 803.025 Table 803-1 (Right-of-way Width) and the existing right-of-way varies between 50 and 60-feet along the frontage. As a condition of approval per SRC 803.040(a)(2), the applicant shall dedicate 30-feet from the centerline of Oak Street SE.

Oak Street SE does not have adequate streetscape improvements along the property frontage, including sidewalk and streetlights. With the required 30-foot right-of-way dedication along Oak Street SE, there will not be adequate right-of-way width to accommodate an 8-foot planter and 5-foot sidewalk due to the paved width of the street being 40-feet. Therefore, the applicant shall provide a curblined sidewalk along Oak Street SE, including ADA curb ramp upgrades at the intersection of 17<sup>th</sup> Street SE and Oak Street SE, pursuant to SRC 803.035(l). Additionally, the applicant shall provide street lighting along Oak Street SE pursuant to SRC 803.035(o).

In order to ensure compliance with SRC 803.040, the following conditions apply:

**Condition:** Convey land for dedication to equal a half-width right-of-way of 30-feet on the development side of Oak Street SE.

**Condition:** Provide streetscape improvements along Oak Street SE, including a 5-foot curblin sidewalk, curb ramp upgrades at the intersection of 17<sup>th</sup> Street SE and Oak Street SE, and street lighting along the property frontage as specified in the City Street Design Standards and consistent with the provisions in SRC Chapter 803.

▪ ***Street Trees***

Pursuant to SRC 803.035(k) and SRC 86.015(e), anyone undertaking development along public streets shall plant new street trees to the maximum extent feasible.

**Finding:** There is inadequate right-of-way width to accommodate street trees along Oak Street NE. Along 17<sup>th</sup> Street SE, there is space for approximately three (3) new street trees along 17<sup>th</sup> Street SE within the existing planter strip and between the sidewalk and the planter strip. As a condition of approval, the applicant shall provide additional street trees along 17<sup>th</sup> Street SE. The following condition applies:

**Condition:** Prior to issuance of a certificate of occupancy, install street trees to the maximum extent feasible along 17<sup>th</sup> Street SE.

▪ ***Alleys***

SRC Chapter 803.025 establishes standards for right-of-way and improvement widths for Alleys. SRC Chapter SRC 76.160 limits encroachments into public right-of-ways.

There is an unnamed alley that extends from the Shelton Ditch to approximately 61-feet south of Oak Street SE. The alley does not extend all the way to Oak Street SE, rather it terminates and the subject property is located between the alley and Oak Street SE. The existing alley is not improved. As shown on the applicants preliminary site plan, the applicant intends to utilize the alley for their primary vehicular access and circulation area. As the alley does not provide vehicular access to any other adjacent properties that do not have frontage on a street, the alley will be improved and maintained by the applicant. The private improvements encroach into the public alley and as such, a Revocable License to Encroach into the alley is required pursuant to SRC 76.160. This document shall establish that the applicant will maintain the improvements within the undeveloped alley as it will not be constructed to a public standard and does not provide public vehicular access. The applicant is required to obtain a Revocable License to Encroach from the Public Works Director, prior to issuance of a building permit. The following condition applies:

**Condition:** Prior to issuance of a Building Permit, the applicant shall obtain a Revocable License to Encroach from the Public Works Director for the private improvements within the public alley which establishes that the applicant shall maintain all private improvements within the alley.

***SRC Chapter 804 – Driveway Approaches:***

SRC 804 establishes development standards for driveway approaches providing access from the public right-of-way to private property in order to provide safe and efficient vehicular access to development sites.

**Finding:** The applicant proposes a new driveway approach onto Oak Street SE and has applied for a Class 2 Driveway Approach Permit; findings for which are provided in this memo. As described in the findings below, the proposal meets the approval criteria for a Class 2 Driveway Approach Permit. With approval of the Class 2 Driveway approach permit, the proposed development meets applicable criteria in SRC Chapter 804 relating to driveway approaches.

***SRC Chapter 805 – Vision Clearance:***

SRC Chapter 805 establishes vision clearance standards in order to ensure visibility for vehicular, bicycle, and pedestrian traffic at the intersections of streets, alleys, flag lot accessways, and driveways.

**Finding:** Vision clearance standards apply at the intersection of 17<sup>th</sup> Street SE and Oak Street SE (SRC 805.005(a)(2) as well as at the driveway approach onto Oak Street SE (SRC 805.005(b)(1)(B)). The applicant has incorrectly shown the required vision clearance area at the intersection of 17<sup>th</sup> Street SE and Oak Street SE. In addition, the applicant shows a gate and fencing within the vision clearance area required for the driveway approach onto Oak Street SE. Fencing and other obstructions are not permitted within the required vision clearance area (SRC 805.010). The applicants preliminary site plan does not comply with the vision clearance standards established in SRC Chapter 805. As a condition of approval, the applicant shall be required to provide an updated site plan that demonstrates compliance with vision clearance standards established in SRC Chapter 805. The following condition applies:

**Condition:** Prior to issuance of a building permit, the applicant shall submit a site plan that demonstrates compliance with Vision Clearance Standards established in SRC Chapter 805 for street and driveway intersections.

***Natural Resources:***

***SRC 601 – Floodplain:*** Development in the floodplain shall be regulated to preserve and maintain the capability to the floodplain to convey the flood water discharges and to minimize danger to life and property.

**Finding:** Floodplain Administrator has reviewed the Flood Insurance Study and Flood Insurance Rate Maps and has determined that AE floodway exists on the subject property. The AE floodway portion of the property is along the southern property boundary where Shelton Ditch is located on the property. No structures are proposed within the floodway; however, the applicant shows grading and new parking and vehicle use areas in the floodway. Pursuant to SRC development within the floodway is not permitted without a “no-rise” certification that demonstrates the proposal will not increase in flood levels (SRC 601.075(d)(1)(A)). The applicant has not provided sufficient information to demonstrate the requirements of SRC Chapter 601 are met. At the time of building permit submittal, the applicant shall provide certification that the final design of the proposed development does not result in an increase in flood levels pursuant to SRC 601.075(d)(1)(A). To ensure compliance with SRC Chapter 601, the following condition applies:

**Condition:** Provide a no-rise certification from a registered professional civil engineer demonstrating through hydrologic and hydraulic analyses performed in accordance with standard engineering practice that the proposed floodway encroachment shall not result in any increase in flood levels during the occurrence of the base flood discharge pursuant to SRC Chapter 601.

**SRC Chapter 809 – Wetlands:** Grading and construction activities within wetlands are regulated by the Oregon Department of State Lands (DSL) and US Army Corps of Engineers. State and Federal wetlands laws are also administered by the DSL and Army Corps, and potential impacts to jurisdictional wetlands are addressed through application and enforcement of appropriate mitigation measures. SRC Chapter 809 establishes requirements for notification of DSL when an application for development is received in an area designated as a wetland on the official wetlands map.

**Finding:** The Salem-Keizer Local Wetland Inventory shows that there are wetland channels along Shelton Ditch that may be impacted by the proposal. The applicant should contact the Oregon Department of State Lands to verify if any permits are required for development or construction in the vicinity of the mapped wetland area(s), including any work in the public right-of-way. Wetland notice was sent to the Oregon Department of State Lands pursuant to SRC 809.025.

**SRC Chapter 810 - Landslide Hazards:** The City's landslide hazard ordinance (SRC Chapter 810) establishes standards and requirements for the development of land within areas of identified landslide hazard susceptibility.

**Finding:** According to the City's adopted landslide hazard susceptibility maps and SRC Chapter 810 (Landslide Hazards), there are mapped 2-point landslide hazard areas on the subject property. The proposed activity of a multi-family development adds 2 activity points to the proposal, which results in a total of 4 points. Therefore, the proposed development is classified as a low landslide risk and no additional information is required.



**Criteria: SRC 220.005(f)(3)(B) The transportation system provides for the safe, orderly, and efficient circulation of traffic into and out of the proposed development, and negative impacts to the transportation system are mitigated adequately**

**Finding—** Access to the proposed development will be provided by the network of existing public streets that surround the property. As conditioned, the required improvements will ensure that the street system in and adjacent to the development will provide for the safe, orderly, and efficient circulation of traffic to and from the development. This criterion is met.

**Criteria: SRC 220.005(f)(3)(C) Parking areas and driveways are designed to facilitate safe and efficient movement of vehicles, bicycles, and pedestrians**

**Finding—** The applicant proposes one new driveway approach onto 17<sup>th</sup> Street SE. As identified in the conditions of approval for the Driveway Approach Permit, the gate restricting access to the driveway is required to be relocated to ensure the driveway approach does not create a traffic hazard. With established conditions of approval, driveway approaches serving the site will provide for facilitate safe and efficient movement of vehicles. This criterion is met.

**Criteria: SRC 220.005(f)(3)(D) The proposed development will be adequately served with City water, sewer, storm drainage, and other utilities appropriate to the nature of the development**

**Finding—** The Development Services division reviewed the proposal and determined that water, sewer, and storm infrastructure are available and appear to be adequate to serve the lots within the proposed development, subject to the conditions of approval established in this decision. This approval criterion is met.

## **CLASS 2 DRIVEWAY APPROACH PERMIT DECISION CRITERIA**

Salem Revised Code (SRC) 804.025(d) provides that an application for a Class 2 Driveway Approach Permit shall be granted if the following criteria are met. The following subsections are organized with approval criteria, followed by findings of fact upon which the decision is based. Lack of compliance with the following criteria is grounds for denial or for the issuance of conditions of approval to satisfy the criteria.

***SRC 804.025(d)(1): The proposed driveway approach meets the standards of this Chapter and the Public Works Design Standards.***

**Finding:** The proposed driveway meets the standards for SRC Chapter 804 and Public Works Design Standards (PWDS). This criterion is met.

***SRC 804.025(d)(2): No site conditions prevent placing the driveway approach in the required location.***

**Finding:** Development Services has reviewed the proposal and determined that no site conditions existing prohibiting the location of the proposed driveway. This condition is met.

***SRC 804.025(d)(3): The number of driveway approaches onto an arterial are minimized.***

**Finding:** The property has frontage on a minor arterial street (17<sup>th</sup> Street SE), and a local street (Oak Street SE). The proposed driveway approach will provide access to the local street abutting the subject property. No accesses to an arterial street are proposed. This criterion is met.

***SRC 804.025(d)(4): The proposed driveway approach, where possible:***

***(A) Is shared with an adjacent property; or***

***(B) Takes access from the lowest classification of street abutting the property***

**Finding:** The property has frontage on a minor arterial street (17<sup>th</sup> Street SE), and a local street (Oak Street SE). The proposed driveway is currently located with access to the lowest classification of street abutting the subject property. This criterion is met.

***SRC 804.025(d)(5): The proposed driveway approach meets vision clearance standards.***

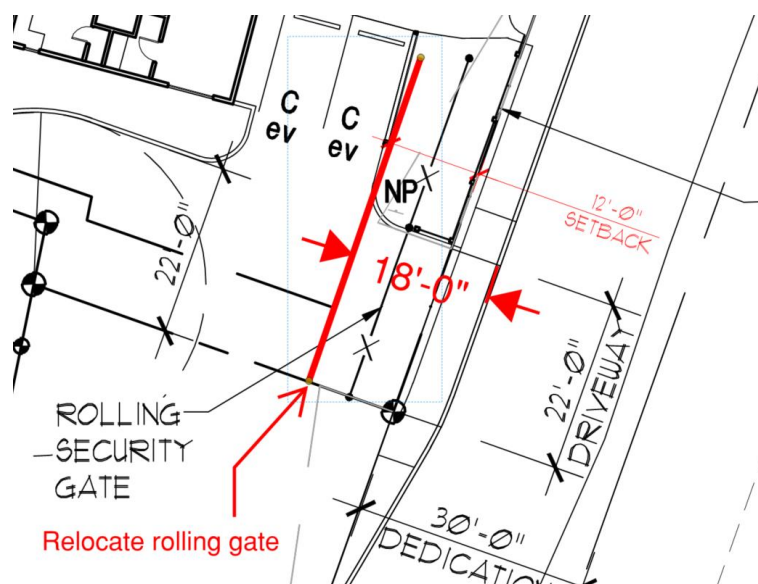
**Finding:** Vision clearance standards apply at the driveway approach onto Oak Street SE (SRC 805.005(b)(1)(B)). The applicant shows a gate and fencing within the vision clearance area required for the driveway approach onto Oak Street SE. Fencing and other obstructions are not permitted within the required vision clearance area (SRC 805.010). The applicants preliminary site plan does not comply with the vision clearance standards established in SRC Chapter 805. As a condition of approval, the applicant shall be required to provide an updated site plan that demonstrates compliance with vision clearance standards established in SRC Chapter 805. The following condition applies:

**Condition:** Prior to issuance of a building permit, the applicant shall submit a site plan that demonstrates compliance with Vision Clearance Standards established in SRC Chapter 805 for the driveway approach onto Oak Street SE.

***SRC 804.025(d)(6): The proposed driveway approach does not create traffic hazards and provides for safe turning movements and access.***

**Finding:** The applicants site plan shows a rolling gate at the driveway approach onto Oak Street SE. The gate is set back 12-feet from the property line, which does not provide adequate space for a vehicle to wait for the gate to open without blocking

vehicular traffic on Oak Street SE. The Assistant City Traffic Engineer has reviewed the site plan and found that the proposal, including the gate, would not provide for safe and efficient movement of vehicles in and out of the development site as it would interfere with vehicle movements within the street. The Assistant City Traffic Engineer requires the gate be to a minimum of 18-feet back from the curb along Oak Street SE, which will allow for one vehicle to queue and wait for the gate to open without blocking vehicle movements within the street. As shown on the image below, the gate will be approximately 18-feet from the curb and align with approximately at the edge of the first parking space upon entering the site.



With the following condition of approval, the driveway approach will ensure the driveway approach does not create a traffic hazard:

**Condition:** The gate for the driveway approach onto Oak Street SE shall be setback approximately 18-feet from the back of the curb of Oak Street SE or the plans shall be revised to eliminate the gate.

With established conditions of approval, the driveway approach will not create a traffic hazard and will provide for safe access to the development.

***SRC 804.025(d)(7): The proposed driveway approach does not result in significant adverse impacts to the vicinity.***

**Finding:** Development Services' analysis of the proposed driveway and the evidence that has been submitted indicate that the location of the proposed driveway will not have any adverse impacts to the adjacent properties or streets. As identified in the conditions of approval, the applicant is required to relocate a gate that restricts access to the driveway approach. With established conditions of approval, this criteria is met.

***SRC 804.025(d)(8): The proposed driveway approach minimizes impact to the functionality of adjacent streets and intersections.***

**Finding:** The property is located on the corner of a minor arterial street (17<sup>th</sup> Street SE) and a local street (Oak Street SE). The applicant is proposing a driveway to the lower classification of street. By complying with the requirements of this chapter the applicant has minimized impacts to the functionality of adjacent streets and intersections. This criterion is met.

***SRC 804.025(d)(9): The proposed driveway approach balances the adverse impacts to residentially zoned property and the functionality of adjacent streets.***

**Finding:** The proposed development is surrounded by residentially zoned property to the east and north. To the west, the property abuts Industrial Commercial zoning. The proposed driveway is taken from the lowest classification street abutting the subject property. The driveway balances the adverse impacts to residentially zoned property and will not have an adverse effect on the functionality of the adjacent streets. This criterion is met.

**RESPONSE TO PUBLIC COMMENTS**

- 1. Vision Clearance along 17<sup>th</sup> Street SE Curve:** Comments received express concerns for the visibility of the curve along 17<sup>th</sup> Street SE and how the proposal would impact vision clearance for vehicles traveling along 17<sup>th</sup> Street SE.

**Staff Response:** As described in the written findings, 17<sup>th</sup> Street SE is fully improved and boundary street improvements along this street are not required. As indicated in the conditions of approval, the applicant is required to provide an updated site plan demonstrating that there is adequate vision clearance at the intersection of 17<sup>th</sup> Street SE and Oak Street SE. The applicant has requested an adjustment to allow reduced setback along 17<sup>th</sup> Street SE and Oak Street SE (12-feet where 20-feet is required). The adjustment does not eliminate the requirement to provide adequate vision clearance at the intersection to ensure safe vehicle turning movements. Vision clearance will be confirmed upon review of the updated site plan, at time of Building Permit review.

- 2. On-street Parking:** Comments received express concerns for the additional vehicles utilizing on-street parking.

**Staff Response:** Oak Street SE exceeds the minimum required width for a local street and accommodates parking on both sides of the street. 17<sup>th</sup> Street SE is a minor arterial street, which does not accommodate on-street parking. On-street parking is not reserved for specific users and will be available to the apartment complex as well as other residents of the area. There are no minimum off-street parking requirements.

- 3. Driveway Spacing/Setback:** Comments received express concerns for the driveway spacing along Oak Street SE for the proposed driveway approach.

**Staff Response:** The proposed driveway approach is located on a local street. There are no minimum spacing standards for driveway approaches onto local streets. The driveway approach is placed along the eastern property line, to allow the maximum spacing from the intersection of 17<sup>th</sup> Street SE and Oak Street SE. The proposed driveway approach meets the standards established in SRC Chapter 804. Additionally, conditions of approval require the driveway approach to meet the vision clearance standards established in SRC Chapter 805 and the gate restricting access to the driveway approach will be set back to allow vehicle queuing to happen outside of the right-of-way.

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