

COMPLETENESS REVIEW RESPONSE

March 14, 2025

Bryce Bishop
City of Salem – Planning Division
555 Liberty Street SE, Room 305
Salem, OR 97301

PROJECT NAME	SITE ADDRESS	REFERENCE NO.
MARION PARKADE	445 MARION STREET NE	24-121254 PLN

The following is our response to comments provided as part of the Completeness Review for the above reference land use review.

COMPLETENESS REVIEW ITEMS

SUBMITTAL REQUIREMENTS

Submittal Requirements for Class 3 Site Plan Review. (SRC 220.005(e)).

- *Submittal requirements for Class 3 Site Plan Review:
Salem Revised Code (SRC 220.005(e)).*
 - *Show property lines on existing and proposed elevation drawings.*
 - *Solar canopies do not read clearly on plan drawings. Please increase line weight of proposed solar canopies on revised drawings.*
 - *Proposed corner projections into the right-of-way to include new signage are significantly larger than existing projections and the signage that they are proposed to be for. Please reduce the mass and height of these architectural features to reduce encroachments into the adjacent rights-of-way.*

RESPONSE:

- Property lines are identified on the revised First Floor and Site Plan, Sheet SP-01 to aid you in your review. The line weight for the proposed solar canopies has been changed to further assist in understanding the drawings.
- The proposed open stair tower roofs will encroach into the ROW as indicated in Detail 2, on the revised First Floor and Site Plan.
- The proposed signage is being installed the architectural feature wall. In the case of this structure on wall sign of up to 100 square feet per street facing facade is permitted in the CB zone SRC 900.130 and 900.170(c)(1)(A).

Adjustment(s)

- *Please clarify how many and for what standards you are requesting Adjustments for – see additional comments below.*

RESPONSE: Initially the request was for two Class 2 adjustments to:

1. SRC 524.010(c) - Minimum setback for accessory structures abutting a street for the solar canopies which will be located on the third-floor parking deck along High Street, Marion Street, and Liberty Street.

2. SRC 806.035(c)(2) – Perimeter setbacks and landscaping for parking abutting streets for the changes to the existing non-compliant screen walls to improve safety within the structure and for pedestrians on the adjacent public sidewalks.

The specific requests were identified in section 1 RESQUEST, with further detail provided in section 4. ADJUSTMENTS. However, as identified in other comments and discussions with Planning staff, the number of adjustments will be based on the number of street property lines where standard cannot be met and deviation is required. Plus, an additional standard SRC 524.010(f)(5)(A)(ii) – Ground floor windows, is not met. As a result, the applicant requires eleven Class 2 Adjustments to three development standards:

- Three (3) - **SRC 524.010(c)**: Minimum Building Setback for Accessory Structures.
- Four (4) – **SRC 524.010(f)(5)**: Minimum Percentage of Ground Floor Windows.
- Four (4) - **SRC 806.035(c)(2)**: Minimum Perimeter Landscape and Screening of Off-Street Parking Adjacent to a Street.

Signage

- *Because signage is proposed to be submitted separately through a later application remove all signage from this submittal.*

RESPONSE: After discussion with the City and Planning Staff it was decided to include proposed signage in this consolidated land use review package. The narrative has been revised to provide details of compliance with applicable standards. Additional information within the updated drawings provides detailing related to the signage design as well.

Historic and Cultural Resources Protection Zone

- *The subject property is within the Historic and Cultural Resources Protection Zone. If it has not been done already, please be sure to contact the Historic Preservation Program Manager, Kimberli Fitzgerald, at kfitzgerald@cityofsalem.net, to discuss applicable regulatory requirements.*

The City of Salem Historic and Cultural Resources Protection Zone Lookup map indicates that the site is within the Historic and Cultural Resources protection Zone.

RESPONSE: A completed City of Salem Archaeological CLEARANCE Form Worksheet is provided as part of the response materials as required.

ADVISORY COMMENTS

CHAPTER 524 - CB

Table 524-4 Setbacks

- *NE and NW Corner Setbacks: Alterations to the northeast and northwest corners do not meet the 0 ft maximum setback requirements. If this code requirement is not met separate Adjustments for each corner will be required. This would be separate Adjustments for each corner not meeting the standard.*

RESPONSE: The existing structure requires a building frontage on High Street, Union Street, and Liberty Street of 75%. Currently, the building is constructed at/over property line or within the allowed 20' setback on all these streets. The new stair towers at the northeaster and northwester corners of the building will be setback from Union Street on the north by approximately 11 feet and from High Street (on the east) and Liberty Street (on the west) by approximately 5 feet meeting the maximum building setback standard, should they apply, for the entirety of the front facade. The setback areas will be paved allowing accessible access from the public sidewalk into the grade level parking areas and where elevators at these corners are also located.

- *Solar Canopies Setbacks: The three proposed solar canopies on the third floor of the parking garage each require their own separate Adjustment to setback requirements.*

These would be Class 2 Adjustments (see 250.005). Please address the approval criteria for each. Additional fees are required for the proposed adjustments.

RESPONSE: The number of adjustments was discussed with staff prior to submittal to determine if application fees for adjustments that were identical with criteria addressing each also being identical would be required. At the time of the conversation it was left open, so we approached it based on responsible use of public funds. However, it is understood that adjustments will be applied based on the number of street property lines where the standard is not met, increasing the Class 2 adjustments for the setback for accessory structures being installed on the third level parking deck to three, and it is also understood that additional fees will be assessed. It is also understood that the other standards which are not met by the existing structure and will not be corrected by the proposed improvements, will also be applied to each street frontage, which will increase the total number of Class 2 adjustments to eleven and increasing fees for the adjustments accordingly.

524.010(f)(2) Building Façade Articulation

- *Proposed alterations are not meeting this code requirement at the corners. Please clarify what is being done to the ground floor, at the corners, to meet this requirement.*

RESPONSE: The new stair towers are open and do not include exterior facades, therefore the standard for building façade articulation does not apply. However, articulation through the use of different materials and colors at these corners achieved.

524.010(f)(6) Weather Protection

- *Alterations to the SE and SW corners of the building remove existing weather protection to less than the required, "90 percent of the length of the ground floor building façade adjacent to a street." If this standard cannot be met Adjustments, for each corner, could be submitted. The applicable decision criteria must be adequately addressed.*

These would be Class 2 Adjustments (see 250.005). Please address the approval criteria for each. Additional fees are required for the proposed Adjustments.

RESPONSE: Weather protection at the southeastern and southwestern corners will be removed when the enclosed stair towers are removed; however, the new stair towers will be open with no facades. Weather protection is based on the façade length not on building frontage. Currently weather protection for the south façade is over 100%, and for eastern and western facades it is 96.5%. Once the improvements are made weather protection for the southern façade will be 100% and for the eastern and western facades it will be 94.2%. All of the remaining weather protection will still exceed the 90% minimum required.

CHAPTER 806 - PARKING

806.035(c)(2)(D) Perimeter Setbacks and Landscaping Abutting Streets.

- *The Adjustment request to remove the existing pony walls on all frontages would be four separate Adjustments. Regardless, the proposal to remove the pony wall, to be replaced with cabling, does not provide physical and visual barrier of vehicles to the adjacent pedestrian realm.*

The current proposal is difficult to approve because of the lack of physical and visual barrier that is provided to pedestrians on adjacent sidewalks.

RESPONSE: Based on discussions with Planning and other City departments, it has been decided that a better approach would be to remove the non-compliant pony walls and replace with semi-transparent screening that will improve safety by eliminating or reducing hiding places. Like the proposed cable rail, this current proposal will provide a physical separation between parking and the public sidewalk, however this design reduces direct views of vehicles and the glare of headlights for pedestrians on the sidewalk. Please see revised elevations for proposed screen design.

CHAPTER 800 – GENERAL STANDARDS

800.060 Lighting

- *Provide a lighting plan and details.*
- *Clarify how the proposed lighting alterations comply with code requirements.*

RESPONSE: Lighting is limited to the fin additions. A detail for the lighting included with the new fin design is provided on the Enlarged Elevations, Sheet SP-08. This design complies code requirements.
