

Comprehensive Plan/Zone Change

East Park Estates

December 14, 2018

Background:

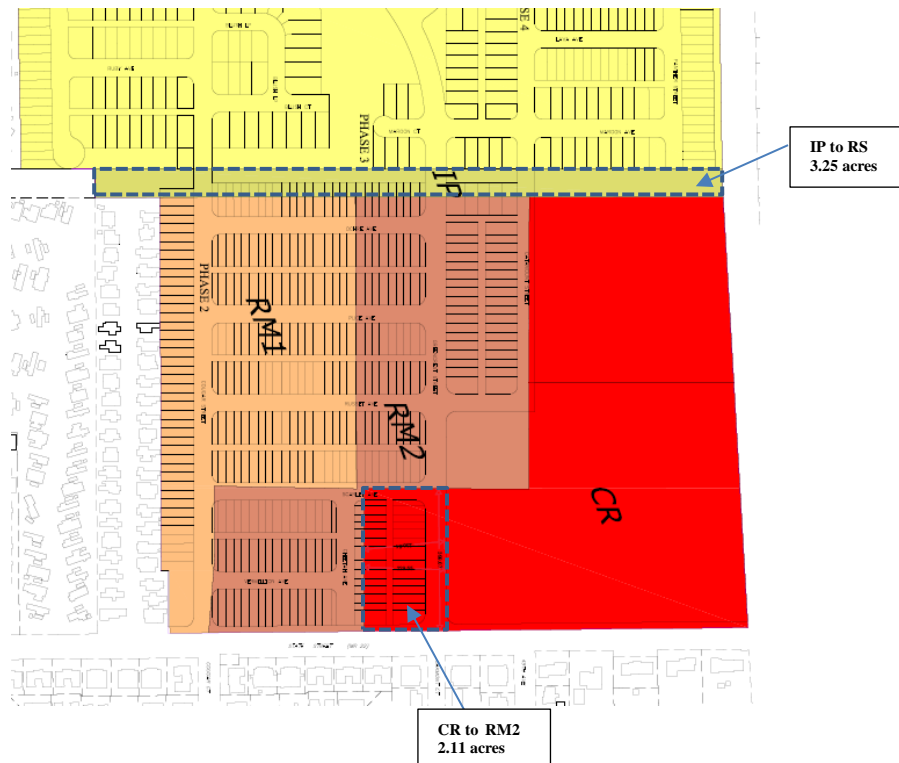
On June 18, 2018, a Pre-Application Conference (PRE-AP18-72) was held with the applicant and City staff. The purpose of the pre-app was to discuss the potential development of the property.

The applicant attended the East Lancaster Neighborhood Association meeting and the East Suburban Neighborhood Association meeting on October 4, 2018, to discuss the proposal with the Neighborhood Association and adjacent property owners.

The applicant is proposing to subdivide 122 acres into a six (6) Phase, 874-Lot Planned Unit Development (PUD)/Subdivision (SUB) with 7.51 acres of park land and 12.29 acres of open space.

Proposal:

The subject properties are approximately 122 acres in size and zoned RS, RM1, RM2, CR, and IP. The applicant is requesting to rezone the southwestern portion of the CR zone (2.11 acres) to RM2 and the IP zone (3.25 acres) to RS and change the comprehensive plan designation from 'Commercial' to 'Multi-Family Residential' and 'Industrial' to 'Single-Family Residential'.



EXISTING SITE CONDITIONS

Vicinity Information:

The subject property contains approximately 122 acres. The subject property is zoned RS (Single-Family Residential), RM1 and RM2 (Multi-Family Residential), CR (Commercial Retail), and IP (Industrial Park). The

subject property is vacant. Topography, property configuration and dimensions area illustrated on the tentative plan.

The surrounding properties are zoned and used as follows:

North: Across Auburn Road NE-RS (Single Family Residential) zone, and Marion county UT-5 (Urban Transition) and UD (Urban Development zones; existing single-family dwellings
East: Across Cordon Road-Marion County AR (Acreage Residential), P (Public), and I (Industrial) zones; existing Marion County Fire Department and existing industrial uses
South: Across State Street-Marion County UD (Urban Development), RM (Multi-Family Residential), and RL (Limited Multi-Family Residential) zones; RA (Residential Agriculture); existing single-family dwellings
West: Marion County RM (Multi-Family Residential); existing single-family and multi-family dwellings

The subject property is located within the City limits (ANXC-689) and the Urban Growth Boundary.

NEIGHBORHOOD PLAN

The subject property is located within the East Lancaster Neighborhood Association (ELNA). The East Lancaster Neighborhood Plan was adopted by Salem City Council on January 16, 1984 (Ordinance No. 19-84). The subject property is not identified on the East Lancaster Neighborhood Land Use Plan Map.

The Land Use Intent Statement under D (Residential (page 6)) states the following:

"According to the Salem Area Comprehensive Plan Map (March 1982), most of the land in ELNA is designated as Single Family Residential. A few areas are designated Multifamily Residential. To accommodate a mix of housing types, the ELNA plan has established tow subcategories:

- 1. Single Family: The intent is to conserve the single-family character of the neighborhood by encouraging the maintenance of existing single-family housing and by promoting the development of new housing through traditional and nontraditional subdivision, planned unit development, and mobile home subdivisions. Zoning for this category shall be Residential Agriculture (RS) and Single Family Residential (RS).*
- 2. Multi Family Density: The intent is to provide a compatible mix of multi-family and single-family dwelling units in order to offer a variety of housing types to neighborhood residents."*

The subject property contains approximately 122 acres. As shown on the September 2018 Salem Comprehensive Plan Map, the subject properties are designated 'Single-Family Residential', 'Multi-Family Residential', 'Commercial', and 'Industrial'.

The applicant is requesting to rezone the southwestern portion of the CR zone (2.11 acres) to RM2 and the IP zone (3.25 acres) to RS and change the comprehensive plan designation from 'Commercial' to 'Multi-Family Residential' and 'Industrial' to 'Single-Family Residential'. The rezoning of these portions of the site will be consist with the intent of the ELNA Plan and consist with the existing zoning of the remainder of the property.

The rezoning of a portion of the CR zone and the rezoning of the entire portion of the IP zone will allow the entire site to be developed as a Planned Unit Development. Providing a mixture of housing types such as attached single family dwellings, detached single family dwellings, and multi-family units.

Therefore, by providing a Planned Unit Development with a compatible mixture of housing types on the site, the proposal is in compliance with the intent of the East Lancaster Neighborhood Association Plan.

APPLICANT'S REASONS ADDRESSING THE COMPREHENSIVE PLAN CHANGE CRITERIA

SRC 64.020(f)(2) minor plan change criteria:

This is a minor plan change in that it only involves the land that the applicant owns. The minor plan change is consistent with the overall objectives of the SACP. No substantive changes are needed to SACP policies or text amendments to accomplish the change in designation. The applicant has outlined below how the proposed meets the criteria under 64.025(e)(2):

64.025(e)(2)(A)(i): Alteration in circumstances

Findings (IP to RS): The subject properties are approximately 122 acres in size and zoned RS, RM1, RM2, CR, and IP. The applicant is requesting to rezone the southwestern portion of the CR zone (2.11 acres) to RM2 and the IP zone (3.25 acres) to RS and change the comprehensive plan designation from 'Commercial' to 'Multi-Family Residential' and 'Industrial' to 'Single-Family Residential'.

The IP zoned portion of the site is located within the center of the proposed PUD. The IP zoned portion is about 3.25 acres in size. As shown on the Salem Zone Map, the social, economic, or demographic patterns of the nearby vicinity have changed so the current IP zone designation is no longer appropriate. This is an area developed with single-family and multi-family dwellings, this 3.25-acre IP zoned property is not a feasible zone in this area. Rezoning the IP portion of the site to RS will allow the 3.25 acres to be developed with uses compatible with the surrounding area, along with a zone that is consistent.

64.025(e)(2)(A)(ii): Equally or Better Suited Designation

Findings (CR to RM2): There is a lack of appropriately designated vacant RM2 sites within this vicinity located within the City limits. There is multi-family zoned property located to the west of the site that is located within the County and is fully developed. The subject property gives the applicant the ability to provide mixed housing within this area and help Salem meet their housing needs. Rezoning 2.11 acres of the CR zone to RMII will allow additional housing to be provided within the proposed PUD, while still leaving 12.82 acres of CR zoned property for future commercial development.

Multi-family units are permitted in the CR zone through the Conditional Use Permit process. However, in order to provide private streets and greater amenities, the applicant is developing the site as a Planned Unit Development (PUD). Planned Unit Developments are not permitted within the CR zone. Therefore, this rezone is necessary in order to provided additional housing and develop the PUD.

According to the Housing Needs Analysis, "Salem has a deficit of capacity in the MF designation, with a deficit of 2,897 dwelling units and a deficit of 207 gross acres of residential land." With a multi-family designation, the subject property can be developed as multi-family dwellings within the proposed PUD; the rezone helps maximize the density while helping to meet housing needs within the Salem Urban Growth Boundary.

The subject property will not only be a site that will contribute to the multi-family housing needs, but it is also a site that can help improve the transportation circulation in the area. The subject property when developed has the potential to provide street connections to the existing street system to provide more efficient circulation in this area of Salem.

In conclusion, due to the social, economic, or demographic patterns of the nearby vicinity, the current IP zone designation is no longer appropriate. Therefore, rezoning the IP portion of the site to RS will allow the 3.25 acres to be developed with uses compatible with the surrounding area, along with a zone that is consistent.

Furthermore, due to the development of the site as a PUD and the additional of needed housing within the City limits, the proposed RM2 zoning is better suited than the current CR zone.

Therefore, this criterion has been met.

64.025(e)(2)(B): Services

The City provided information at the pre-application conference (PRE-AP18-72) that water and sewer lines are available for extension into the site. Natural gas, telephone and electrical services are located within the public right-of-way.

Applicable state or federal permits are required to be obtained for issuance of building or construction permits from the City.

Private utilities will be provided with under grounding of electrical, gas, telephone and cable lines into the site.

The needed services are available for the development of the site.

64.025(e)(2)(C): Urbanization

The City's adopted Comprehensive Plan Goal and Policies implements Urbanization through its Statewide Planning Goals. The subject property is within the City of Salem and located within the UGB.

The subject property is within a developing area of the City and does not convert the urban areas beyond the City limits. Specific development triggers specific facilities that are required to be connected to existing systems for looped service. Police, fire and applicable government services can be provided via the increase in property taxes as a result of new development. The proposal permits efficient, compact development to contain sprawl and preserves the land by developing under the requirements of the Code.

64.025(e)(2)(D): Comprehensive Plan/Applicable Goals

The following Statewide Planning Goals apply to this proposal:

The request is in conformance with State Wide Planning Goals and all applicable land use standards imposed by state law and administrative regulation, which permit applications to be filed. Development of the subject property can meet the minimum standards of the zone code and the STSP. The proposal complies with the applicable intent statements of the SACP as addressed in this report. The applicant has presented evidence sufficient to prove compliance with these standards.

Goal 1 – Citizen Involvement:

The City's adopted Comprehensive Plan General Development Goal and Policies, and its adopted zone code, implement the Statewide Citizen Involvement Goal. This application will be reviewed according to the public review process established by the City of Salem. The City's Plan is acknowledged to be in compliance with this Goal. Notice of the proposal will be provided to property owners and public agencies, and posted on the property. The published notice will identify the applicable criteria. A public hearing to consider the request will be held by the Planning Commission. Through the notification and public hearing process all interested parties are afforded the opportunity to review the application, comment on the proposal, attend the public hearing, and participate in the decision. These procedures meet the requirements of this Goal for citizen involvement in the land use planning process.

Goal 2 – Land Use Planning:

The City's adopted Comprehensive Plan implements the Statewide Land Use Planning Goal. The Salem Area Comprehensive Plan (SACP) is acknowledged to be in compliance with the Statewide Planning Goals. This proposal is made under the goals, policies and procedures of the SACP and its implementing ordinance. A description of the proposal in relation to the intent of the Plan, its applicable goals and policies, the planned unit development, and comprehensive plan change/zone change criteria is part of this review. Facts and evidence have been provided that support and justify the proposed comprehensive plan/zone change, along with findings and evidence to support the planned unit development of the subject property into the City of Salem. For these reasons, the proposal conforms to the land use planning process established by this Goal.

Goal 5 – Natural Resources, Scenic and Historic Areas, and Open Spaces:

The City's adopted General Development, Scenic and Historic Areas, Natural Resources and Hazards Goals and Policies address the Statewide Goal. According to City map there are mapped wetlands or waterways on the subject property. In the event that a resource is identified, the City's applicable riparian, tree protection and wetland development standards will be applied at the time of development and will ensure compliance with Goal 5.

Landslide hazards do exist on the site. Therefore, a geological assessment is not required. A geological assessment is being finalized and will be provided to the City of Salem.

There are no significant historic buildings on the subject property. If identified, the applicant will work with the City to determine the appropriate permits and process for a historic building.

The applicant has taken the opportunity to consider existing conditions and influences that enables him to explore potential development. The City has standards in place to address access, internal circulation, topography, drainage, public facilities, overall site design and layout.

Goal 6 – Air, Water and Land Resources Quality:

The City's adopted Comprehensive Plan Growth Management, Scenic and Historic Areas, Natural Resources and Hazards, Commercial, Industrial and Transportation Goals and Policies along with adopted facilities plans implement this Goal.

Development is required to meet applicable State and Federal requirements for air and water quality. The proposal to redevelop is reviewed by the City and any applicable outside agencies for impacts on environment and compliance to applicable standards and regulations. Development is required to meet applicable water, sewer, and storm drainage system master plan requirements. Upon redevelopment, the City is responsible for assuring that wastewater discharges are treated to meet the applicable standards for environmental quality.

The City has identified the process through which water; sewer and storm drainage will be supplied to the site. Storm water runoff will be collected and removed by the City storm drainage system, in a manner determined by the City to be appropriate.

The proposed site is outside the noise contours of the air traffic, and that the facility will nevertheless utilize building materials that mitigate such noise, if any.

The major impact to air quality in the vicinity is vehicle traffic along the boundary streets. The traffic generated from the site will be minor compared to the total volume of traffic in this area, and will not create a significant additional air quality impact.

The proposed change will have no significant impact on the quality of the land. Considering the location of the site within the city, the availability of public facilities to provide water, sewage disposal and storm drainage services, and the surrounding transportation system, the proposal will have no significant impacts to the quality of the air, water or land. The City's adopted facility plans implement Goal 6.

Goal 10 – Housing:

In 1998 and 2000, in order to meet State Wide Planning Goal 10 (Housing), properties along Wallace Road were rezoned to RM1 and RM2 as part of the Salem Multi-Family Residential Land Study (SMFLS).

The subject properties are approximately 122 acres in size and zoned RS, RM1, RM2, CR, and IP. The applicant is requesting to rezone the southwestern portion of the CR zone (2.11 acres) to RM2 and the IP zone (3.25 acres) to RS and change the comprehensive plan designation from 'Commercial' to 'Multi-Family Residential' and 'Industrial' to 'Single-Family Residential'.

According to the 2014 Housing Needs Analysis, "Salem has a deficit of land for nearly 2,900 dwelling units (2,897) in the Multi-Family Residential designation. ...Salem has a deficit of about 207 gross acres of land in the Multi-Family Residential." The rezone helps maximize the density while helping to meet housing needs within the Salem Urban Growth Boundary.

As stated in the Salem's Housing Needs Analysis dated December 2014, Page 48:

"Increase land available for multifamily housing types in single-family designations. One approach to addressing a portion of the deficit of Multi-Family land is to increase opportunities for development of townhouses, duplexes, tri-plexes, and quad-plexes in the Single-Family and (possibly) Developing Residential designations. These types of multifamily housing are generally compatible with single-family detached housing."

The applicant's proposal helps the City re-designate land while helping meet the housing needs. By rezoning the IP and the CR portions of this property, the applicant will be able to develop the site as a Planned Unit Development with a mixture of attached and detached housing types. Therefore, meeting the intent of the Housing Needs Analysis.

The development will also be located in an area in close proximity to existing and proposed services. Auburn Elementary School, Holland Youth Park and Auburn Center Golf Club are located to the west and east of the property. Commercial Services are currently available to the west along State Street.

The existing neighborhood consists of single family housing and multi-family housing. In order to maintain the character of the neighborhood, the site will be developed in compliance with required Design Standards through the required Site Plan Review/Design Review process.

The City's adopted Comprehensive Plan Growth Management, Residential, Transportation Goals and Policies and applicable adopted facilities plans implement the Statewide Housing Goal.

Goal 11 - Public Facilities and Services:

The City's adopted Comprehensive Plan Growth Management, residential, and Transportation Goal and Policies and adopted Stormwater and Water Master Plans implement the Statewide Public Facilities and Services Goal by requiring development to be served by public services. The proposal is for revitalized urban development in an area where future extensions of those services can be provided in the most feasible, efficient and economical manner. The City's capital improvement program and its minimum code standards for public facilities provide a means for improving and updating public facilities systems (water and sewer). All necessary and appropriate public services and facilities essential for development will be provided to this property at levels that are adequate to serve the proposed use.

The City maintains an infrastructure of public services that includes sewer, water, and storm drainage facilities. The City will specify any needed changes to the existing service levels at the time building permits are requested.

Sidewalks are or will be provided throughout the site to connect to the public sidewalk system. The location along a major transportation corridor facilitates access to a transit route, bicycle and pedestrian access, provides significant opportunity to reduce vehicle miles traveled. The vehicle, transit, bicycle, and pedestrian circulation systems will be designed to connect major population and employment centers in the Salem urban area, as well as provide access to local neighborhood residential, shopping, schools, and other activity centers.

The Salem-Keizer School District provides public education facilities. The education district's master plan provides for growth in the district and has options to meet the demand. The education district reviews the population factors to determine planning, funding and locating new schools or providing additional facilities on the sites of existing schools.

Other private service providers supply garbage, telephone, television, postal and internet services as needed by the development. The required public services and facilities to serve new development will be determined

by the City at the time development permits are requested. By providing adequate public facilities and services for the proposed use, the requirements of this Goal are met.

Goal 12 – Transportation:

The City's adopted Comprehensive Plan Transportation Goal and Policies and the adopted Salem Transportation System Plan (STSP) implements the Statewide Transportation Goal by encouraging a safe, convenient and economic transportation system. The major streets are in place due to previous developments. A Traffic Impact Analysis is currently be finalized and will be provided to the City of Salem.

64.025(e)(2)(E): Public Interest

The public is benefitted by creating a well-located parcel of multi-family land and single-family land; it will increase the City and State tax base; will be an attractive and efficient development; will identify and mitigate any hazard areas in a responsible manner.

The rezoning addresses planning issues such as use, adequate parking, open space, landscaping, access, internal circulation, public facilities, topography, and drainage. Site constraints such as configuration, frontage and topography are always taken into consideration for lot layout and access. Enhanced vehicular circulation is critical to City as well as the applicant.

In summary, by establishing a use that is consistent with the future economic and housing needs, and by providing a compatible use, the proposed change benefits the public.

ZONE CHANGE CRITERIA SRC CHAPTER 265

The intent and purpose of a zone change is described in SRC 265. In this section, it is recognized that due to a variety of factors including normal and anticipated growth, changing development patterns and concepts, and other factors which cannot be specifically anticipated, the rezoning of the property is consistent with the character of the neighborhood. The zone change review process is established as a means of reviewing proposals and determining when they are appropriate.

This zone change is requested in order to allow a higher density use on the site. The proposed RS and RM2 zones will implement the requested "Single-Family Residential" and "Multi-Family Residential" SACP map designation.

ZONE CHANGE CRITERIA SRC 265.005(e)(1)(A)(ii)-(iii) and (C)-(G):

(1) A quasi-judicial zone change shall be granted if all of the following criteria are met:

(A) The zone change is justified based on the existence of one or more of the following:

- (i) A mistake in the application of a land use designation to the property;*
- (ii) A demonstration that there has been a change in the economic, demographic, or physical character of the vicinity such that the proposed zone would be compatible with the vicinity's development pattern; or*
- (iii) A demonstration that the proposed zone is equally or better suited for the property than the existing zone. A proposed zone is equally or better suited for the property than an existing zone if the physical characteristics of the property are appropriate for the proposed zone and the uses allowed by the proposed zone are logical with the surrounding land uses.*

Applicant Response to (A)(iii): The proposed zone change fits the development pattern of the vicinity. The surrounding properties to the west, east, and south are located within the County and developed as multi-family and single-family residential dwellings. Properties to the north are located within the City of Salem and County and developed as single-family dwellings. The proposed zone change will allow the site to be developed as a Planned Unit Development with high density housing which will be compatible with the existing uses and additional amenities such as open space.

There is RM2 and RS zoned property in the area. These sites are all developed. This site gives the applicant the ability to provide mixed housing and needed housing within this area and help Salem meet their housing needs.

As shown on the City land zone map there is no RS and/or RM2 property contiguous to the existing site that is vacant.

According to the Housing Needs Analysis, "Salem has a deficit of capacity in the MF designation, with a deficit of 2,897 dwelling units and a deficit of 207 gross acres of residential land. With a multi-family designation and a single-family designation, the subject property can be developed as multi-family and single-family dwellings; the rezone helps maximize the density while helping to meet housing needs within the Salem Urban Growth Boundary.

The subject property will not only be a site that will contribute to the housing needs, but it is also a site that can help improve the transportation circulation in the area. The subject property when developed has the potential to provide street connections to the existing street system.

In conclusion, there are no vacant sites located in this area. A multi-family and single-family use on the site is better suited for the site because of the location and by helping to provide additional housing in the City of Salem.

Therefore, the proposal satisfies this criterion has been met.

(B) City-initiated zone change.

Applicant Response to (B): The proposed zone change is not City-initiated. Therefore, this criterion is not applicable.

(C) The zone change complies with the applicable provisions of the Salem Area Comprehensive Plan.

Applicant Response to (C): The applicant is requesting a change to the Comprehensive Plan Designation from "Developing Residential" to 'Multi-Family Residential' and; a change to the Comprehensive Plan Designation from "Industrial" to 'Single-Family Residential'

The proposal complies with the "Residential" Goals and provisions of the SACP by creating an area that promotes multi-family and single-family uses.

Residential Development Goal

The SACP states that one of the intents of the Residential Development goals is, "To promote a variety of housing and opportunities for all income levels and an adequate supply of development land to support such housing."

The zone change will allow the property to be developed at a higher density, therefore, meeting or exceeding the dwelling average.

Residential Development Policies

Establishing Residential Uses: The applicant's proposal is to rezone 3.25 acres of the property from IP to RS and rezone 2.11 acres of the property from CR to RM2 to allow a higher density to be built on the site within a Planned Unit Development. As stated above, according to the Housing Needs Analysis, Salem has a deficit of MF designated land, with a deficit of 2,897 dwelling units and a deficit of 207 gross acres of multi-family land. The rezone helps maximize the density while helping to meet housing needs within the Salem Urban Growth Boundary. Therefore, establishing a mixture of residential uses within the area.

Facilities and Services Location: The City's adopted Comprehensive Plan Transportation Goal and Policies and the adopted Salem Transportation System Plan (STSP) implements the Statewide Transportation Goal

by encouraging a safe, convenient and economic transportation system. The major streets are in place due to previous development.

The City's adopted Comprehensive Plan Growth Management, residential, and Transportation Goal and Policies and adopted Stormwater and Water Master Plans implement the Statewide Public Facilities and Services Goal by requiring development to be served by public services. The proposal is for revitalized urban development in an area where future extensions of those services can be provided in the most feasible, efficient and economical manner. The City's capital improvement program and its minimum code standards for public facilities provide a means for improving and updating public facilities systems (water and sewer). All necessary and appropriate public services and facilities essential for development will be provided to this property at levels that are adequate to serve the proposed use.

The subject property is located within the Salem Urban Growth Boundary and in the corporate city limits. The subject property is located outside the Urban Service Area. Urban Growth Area Development Permit UGA09-07MOD1 has been approved for the property. At this time, a new UGA permit has not been deemed necessary.

The City maintains an infrastructure of public services that includes sewer, water, and storm drainage facilities. The City will specify any needed changes to the existing service levels at the time building permits are requested.

Infill Development: There are existing structure located on the subject property. In order to provide a needed housing type in Salem, the applicant is requesting a zone change. All the properties within the area are developed as single-family development, multi-family development, and commercial development. The comprehensive plan encourages a mixture of housing types with in a neighborhoods that have access to commercial services.

The comprehensive plan change/zone change will promote infill development with the development of a property that is already served by City Services and transportation, to be developed with a higher density of housing that is needed in this area.

Multi-Family Housing: The development will also be located in an area in close proximity to existing and proposed services. There are several parks located to the west and east of the subject property. Commercial services are located west of the site along State Street.

The existing neighborhood consists of single family housing and multi-family dwellings. In order to maintain the character of the neighborhood, the site will be developed in compliance with required Planned Unit Development and Design Standards. The applicant will be required to go through the PUD and Design Review/Site Plan Review process prior to development.

Circulation System and Through Traffic: The subject property is located south of Auburn Road, west of Cordon Road, and north of State Street. The subject property will have direct access onto Auburn Road and State Street when developed. The major streets are in place due to previous development.

Alternative Housing Patterns: The surrounding properties are zoned for single family development and multi-family. In order to provide a residential housing pattern while being consistent with the neighborhood, the proposed development will provide a higher density of needed housing in Salem while meeting the required Design Standards and Planned Unit Development guidelines.

Requests for Rezoning: The subject property is designated for residential development. All public facilities and services are available to the site. The proposed development will meet State Wide Planning Goals and Policies pertaining to residential development. The development of the site will not impact adjacent properties.

Urban Design: The City has adopted Design Standards and has a process in place to help implement multi-family design standards. The applicant's development will be in compliance with the Multi-Family Design Standards and PUD standards as outlined in the Code. As required by code, the applicant will submit a Design Review and Site Plan Review application.

The rezoning of the site will help to maximize the densities in the area while providing a mixture of housing in the area. This development will be in a location with accessibility to the commercial developments west on State Street. Therefore, meeting the guidelines of providing housing within areas with services. The development of the site will encourage a mixture of housing types and higher densities within an infill lot.

Salem-Keizer Housing Needs Analysis:

According to the Housing Needs Analysis, "Salem has a deficit of capacity in the MF designation, with a deficit of 2,897 dwelling units and a deficit of 207 gross acres of residential land. The rezone helps maximize the density while helping to meet housing needs.

Therefore, this criteria has been met.

(D) The zone change complies with applicable Statewide Planning Goals and applicable administrative rules adopted by the Department of Land Conservation and Development.

Applicant Response to (D): All Planning Goals have been addressed above. See findings under **64.025(e)(2)(D)**.

(E) If the zone change requires a comprehensive plan change from an industrial designation to a non-industrial designation, or a comprehensive plan change from a commercial or employment designation to any other designation, a demonstration that the proposed zone change is consistent with the most recent economic opportunities analysis and the parts of the Comprehensive Plan which address the provision of land for economic development and employment growth; or be accompanied by an amendment to the Comprehensive Plan to address the proposed zone change; or include both the demonstration and an amendment to the Comprehensive Plan.

Applicant Response to (E): The applicant is proposing to change the zone of 3.25 acres from IP to RS and 2.11 acres from CR to RM2. The subject property is currently zoned IP, CR, RS, RM1, and RM2.

Therefore, this criteria is not applicable.

(F) The zone change does not significantly affect a transportation facility, or, if the zone change would significantly affect a transportation facility, the significant effects can be Adequately addressed through the measures associated with, or conditions imposed on, the zone change.

Applicant Response to (F): The current zoning of the property is IP, CR, RS, RM1, and RM2. The applicant is proposing to change the zone of 3.25 acres from IP to RS and 2.11 acres from CR to RM2, so the site can be developed at a higher density within a Planned Unit Development.

A Traffic Impact Analysis is currently being finalized and will be provided to the City of Salem.

This criterion has been met.

(G) The property is currently served, or is capable of being served, with public facilities and services necessary to support the uses allowed by the proposed zone.

Applicant Response to (G): The Subject Property is currently served, or is capable of being served, with public facilities and services necessary to support the uses allowed in the RS and RM zones.

Therefore, this criteria has been met.

CONCLUSION

We believe that the requested Comprehensive Plan Change/Zone Change application is appropriate for the subject property for the reasons describe herein. The proposal is consistent and in compliance with the applicable goals and policies of the Comprehensive Plan and the Statewide Planning Goals and satisfies all applicable criteria. As demonstrated herein, the "Multi-Family Residential" and the "Single-Family Residential" land use designations and corresponding RM2 (Multi-Family Residential) and RS (Single-Family Residential) zoning designations are appropriate for the subject property.

We believe that the materials submitted address all the relevant City criteria for a Comprehensive Plan Change/Zone Change. Obviously, there are other approval processes needed for the development of the property at the time proceeding actual development. For these reasons, we believe that the proposal is warranted and that the Planning Commission has sufficient findings to grant the proposal as requested.

