

WRITTEN STATEMENT**May 20, 2020****Project:** Zone Change and Minor Comprehensive Plan Map Amendment**Address:** 905 & 925 Cottage St NE, Salem, OR 97301**Tax Map:** 07 3W 23CB**Parcel Number:** 14300 & 14301**Neighborhood:** Grant Neighborhood Association**Current Zoning:** RS, Single Family Residential with Religious Special Use**Current Comprehensive Plan Map Designation:** SF, Single Family Residential**Proposed Zoning:** CO, Commercial Office**Proposed Comprehensive Plan Map Designation:** Com, Commercial**LAND USE REQUEST:**

Applicant requests a Zone Change and a Minor Comprehensive Plan Map Amendment to change zoning designation of the subject properties to CO Commercial Office and COM Commercial, respectively. Applicant submits herewith the materials required for a Type III application procedure for consolidated review.

Subject properties total combined area equals 12,900 SF, 6,450 SF each parcel. Existing structure on lot 14300 equals approximately 6,269 SF floor area and is currently used for religious assembly. Existing structure on lot 14301 equals approximately 1,978 SF floor area and is currently in residential use. Subject properties lie within Grant Neighborhood, a central Salem neighborhood located north of the downtown area and are within ¼ mile of Salem's Transportation Core Network. Applicant's proposed use includes Affordable Residential Dwelling units, and Commercial Office space. Proposed use in existing building located on parcel 14300 includes approximately (14) dwelling units ranging in size from 230 to 647 square feet. Proposed use in building located on parcel 14301 proposed use includes an approximately 700 SF Single

Family dwelling unit and approximately 1,280 SF Commercial Office. Existing buildings proposed to remain with no increase in building footprint or height. Proposed alterations contemplated include site work to reconfigure parking and landscape areas, accessibility upgrades for vehicle and pedestrian access, upgrades to the building exterior for access and safety, and interior remodel. Design for proposed uses prioritizes maintaining the historic character of the existing buildings.

Criteria applying to this matter for the application includes:

Part I: Salem Revised Code

- Title V, Chapter 64 Comprehensive Planning
- Title X, Chapter 265 Zone Changes, Chapter 300 Procedures for Land Use Applications and Legislative Land Use Proposals

Part II: Salem Area Comprehensive Plan

- Comprehensive Policies Plan, Neighborhood Plan, Public Facilities Plan, Transportation System Plan

Part III: Oregon's Statewide Planning Goals

PART I | Salem Revised Code

SRC TITLE V – CHAPTER 64 COMPREHENSIVE PLANNING

Sec. 64.025. - Plan map amendments

(a) Applicability

- (2) A minor plan map amendment is an amendment to either the comprehensive plan map or a general land use map in a neighborhood plan, where the amendment affects only a small number of properties or a closely circumscribed set of factual circumstances.***

(b) Standing to initiate plan map amendments.

- (2) Notwithstanding SRC 300.1110, a minor plan map amendment may only be initiated by the Council, the Planning Commission, or an owner of property that is the subject of the amendment, or that owner's agent.***

(c) Procedure type.

- (2) Minor plan map amendments are quasi-judicial decisions, and are processed as a Type III procedure under SRC chapter 300.***

Findings: The applicant requests a Minor Comprehensive Plan Map Amendment for parcels 14300 & 14301. The applicant is the contracted purchaser of the property with the owner's consent.

(d) Submittal requirements

- (2) In addition to the submittal requirements for a Type III application under SRC chapter 300, an application for an applicant-initiated minor plan map amendment shall include the following:***
 - (A) An existing conditions plan of a size and form and in the number of copies meeting the standards established by the Planning Administrator, containing the following information:***
 - (i) The total site area, dimensions, and orientation relative to north;***
 - (ii) The location of existing structures and other improvements on the site, including, but not limited to, buildings, accessory***

structures, fences, walls, parking areas, and driveways, noting their distance from property lines;

(iii) The location of drainage patterns and drainage courses, if applicable;

(B) A traffic impact analysis, if required by the Director.

Findings: Existing conditions plan submitted herewith. A Transportation Planning Rule Analysis is also submitted herewith.

(e) Criteria

(2) Minor plan map amendment. The greater the impact of the proposed minor plan map amendment, the greater the burden on an applicant to demonstrate that the criteria are satisfied. A minor plan map amendment may be made if it complies with the following:

(A) The minor plan map amendment is justified based on the existence of one of the following:

(i) Alteration in circumstances. Social, economic, or demographic patterns of the nearby vicinity have so altered that the current designations are no longer appropriate.

Findings: Grant Neighborhood is primarily a residential neighborhood with a mix of uses including Single Family (RS), Multi-Family (RM2), and their respective special or conditional uses. Businesses in this neighborhood operate out of Single Family residences or approved conditional or special use buildings. Multi-Family zone uses within 300' south of subject properties include multi-family apartment residences, a rehabilitation center, and small lodging facilities.

Existing buildings, constructed in 1910, have significant historical value and character. Existing Church located on subject properties acts as a buffer between the large scale developments to the south and the small scale single family residential neighborhood. Proposed use allows the existing Church to act as a Middle Missing Housing development, often integrated into city blocks with primarily single-family residences. Existing Residence located on subject properties further acts as a buffer between the larger scale and more intensive uses to the south, and the single

family residential lots to the north. Proposed use of the Residence is comparable to existing use. Proposed use of subject properties maintains existing buildings with minimal impact to the facades.

Updates to the interior layout better serve the Grant Neighborhood community. Proposed use increases access to fair housing opportunities by creating 14 new affordable units within the existing Church and residence service offices over a single-family dwelling unit in the existing Residence.

The State of Oregon is in a housing crisis and increasing Affordable Fair Housing opportunities is one of the City's top priorities. The site's size, existing footprint, and proximity to both public transit as well as large selection of social service agencies, educational, health, and vocational services make it an ideal location for Affordable Fair rental housing.

The existing Church intends to relocate to a new site that will both provide greater flexibility for their growing congregation, as well as improve accessibility for their most vulnerable members. Evergreen Church's decision to relocate was primarily due to the physical limitations of the subject properties and existing buildings, namely the minimal on-site parking, and the cost to improve ADA accessibility. The existing main level of the Church is significantly sloped and only accessible by non-compliant stairs. If the zone remains unchanged, these physical limitations will continue to hinder the existing allowed uses of the site, regardless of ownership, and will prevent the site from achieving its highest and best use.

In sum, the proposed rezoning is not only necessary to maintain efficient and effective use of the site, but its intended new use will meet a grave need for Affordable Fair Housing in downtown Salem.

The rezone allows the proposed use (affordable housing) to align more closely with the original land use intention (Single-Family housing) while providing additional housing stock and

preserving the historical character of the neighborhood. The commercial activity of the proposed offices is minimal and will not change the fabric of the existing neighborhood.

Current zoning designation is no longer appropriate as it limits the potential of subject properties to meet the long-term housing and historic preservation goals found in the Salem Comprehensive Plan. Therefore, proposed use aligns with the current social, economic, and demographic pattern of the vicinity of the Grant Neighborhood and surrounding neighborhoods.

(ii) Equally or better suited designation. A demonstration that the proposed designation is equally or better suited for the property than the existing designation.

Findings: Proposed permanent affordable residences on site better align with the intended Single Family zone than the existing religious assembly use or potential uses such as a daycare facility or other conditional uses. Size and structure of the existing building are appropriate for the proposed use.

There is an increasing concern the religious assembly use is not viable based on market trends and on-site physical limitations. However, the existing Church and Residence have significant historical character. Single Family use on site would most likely require redevelopment to occur, causing the loss of the Church and its historical character. CO rezone allows the office function for the applicant, along with housing, which is a symbiotic relationship better suited for the property and maintaining the neighborhood character.

(B) 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 plan map designation;

Findings: Existing religious use of the Church can effectively be used by a large number of people any day of the week and often hosts events and gathering in numbers exceeding the anticipated occupant load of the proposed residential and office uses. Existing water, sewer, storm drains, roadway, electrical, and fire hydrant facilities location on or near site. 8" existing sewer main in

alley, 10" main water supply located in Cottage St, 1" H2O service line to each building. Existing fire hydrant at southwest corner of D Street and Cottage Street intersection. Existing overhead electrical lines.

Proposed use of the Residence comparable to existing use. Services and public facilities sufficient. Proposed use of the Church lessens the occupant count of the building according to 2019 OSC Chapter 10 Mean of Egress Section 1004 Occupant Load and according to SRC table 700-3 maximum seating capacity. Intended use requires driveway demolition in lieu of alley access to proposed parking lot, access to public roadway remains. Subject properties sufficient to accommodate required small project stormwater treatment infrastructure. Per the Transportation Planning Rule Analysis, traffic from proposed use will increase compared to existing. However, the increase is within the threshold for acceptable trip generation increases, existing roadways sufficient.

(C) The proposed plan map designation provides for the logical urbanization of land;

(D) The proposed land use designation is consistent with the Salem Area Comprehensive Plan and applicable statewide planning goals and administrative rules adopted by the Department of Land Conservation and Development; and

Findings: Subject properties are existing urban developments within the Salem Urban Growth Boundary. See also [Part II](#) and [Part III](#).

(E) The amendment is in the public interest and would be of general benefit.

Findings: The amendment allows the historical character of the neighborhood to remain intact. The zone change accommodates proposed uses while minimizing the impact on the neighborhood, maintaining the existing character, fulfilling the need for additional Affordable Fair housing options, and providing resident service offices.

SRC TITLE X – CHAPTER 265

ZONE CHANGES

Sec. 265.005. - Quasi-judicial zone changes

(d) Submittal requirements. In addition to the submittal requirements for a Type III application under SRC chapter 300, an application for a quasi-judicial zone change shall include the following:

- (1) An existing conditions plan of a size and form and in the number of copies meeting the standards established by the Planning Administrator, containing the following information:***
 - (A) The total site area, dimensions, and orientation relative to north;***
 - (B) The location of existing structures and other improvements on the site, including accessory structures, fences, walls, and driveways, noting their distance from property lines; and***
 - (C) The location of drainage patterns and drainage courses, if applicable;***
- (2) A traffic impact analysis, if required, in the format specified, and based on thresholds specified in standards established, by the Director.***

Findings: Existing conditions plan submitted herewith. A Transportation Planning Rule Analysis is also submitted herewith.

(e) Criteria.

- (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***

Findings: See similar findings above, **Sec. 64.025** ([Findings](#))

(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.

Findings: See similar findings above, **Sec. 64.025** ([Findings](#))

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

Findings: See [Part II](#) for Salem Area Comprehensive Plan compliance.

(D) The zone change complies with applicable statewide planning goals and applicable administrative rules adopted by the Department of Land Conservation and Development.

Findings: See [Part III](#) for statewide planning goals and applicable administrative rules adopted by the Department of Land Conservation and Development compliance.

(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.

Findings: See similar findings above, **Sec. 64.025** ([Findings](#))

Sec. 265.025. - When zone change requires comprehensive map amendment.

A zone change may require an amendment to the comprehensive plan map. A zone change requires an amendment to the comprehensive plan map when the zone proposed with the change requires a different corresponding plan map designation. If an amendment to the

comprehensive plan map is required, the zone change and comprehensive plan map amendment shall be consolidated under SRC chapter 300.

Findings: The proposed Zone Change requires a corresponding change to the Comprehensive Plan Map. Applicant requests that the Zone Change and Amendment be consolidated as outlined under SRC Chapter 300.

SRC TITLE X – CHAPTER 300

PROCEDURES FOR LAND USE APPLICATIONS AND LEGISLATIVE LAND USE PROPOSALS

Sec. 300.120. - Procedures for review of multiple applications.

When multiple land use actions are required or proposed by an applicant, the applications may be processed individually in sequence, concurrently, or through the consolidated procedure provided in this section. The applicant shall elect how the land use applications are to be processed, except where a specific review process or sequence is otherwise required or where the land use applications are subject to the same procedure type and decided upon by the same Review Authority. When multiple land use applications are subject to the same procedure type and decided upon by the same Review Authority, the land use applications shall be consolidated.

(c) Consolidated applications. When multiple applications are consolidated, a single application is filed for all land use actions. The application shall be accompanied by the information and supporting documentation required for each individual land use action. Review of the application shall be according to the highest numbered procedure type required for any of the land use applications. The Review Authority shall be the highest applicable Review Authority under the highest numbered procedure type required for any of the land use applications.

Findings: The applicant requests that the proposed Zone Change and Minor Amendment to Comprehensive Plan Map are reviewed as a Consolidated application.

Sec. 300.200. - Initiation of applications.

(a) Type I, Type II, Type III, and Type IV land use applications may be submitted by one or more of the following persons:

- (1) The owner of the subject property;***
- (2) The contract purchaser of the subject property, when the application is accompanied by proof of the purchaser's status as such and by the seller's written consent;***

Findings: The applicant has submitted proof of purchaser's status and seller's consent herewith.

Sec. 300.210. - Application submittal.

(a) Land use applications shall be submitted on forms prescribed by the Planning

Administrator. A land use application shall not be accepted in partial submittals. All of the following must be submitted to initiate completeness review under SRC 300.220. All information supplied on the application form and accompanying the application shall be complete and correct as to the applicable facts.

- (1) A completed application form***
- (2) Recorded deed/land sales contract with legal description;***
- (3) Any information that would give rise to an actual or potential conflict of interest under state or local ethics laws for any member of a Review Authority that will or could make a decision on the application;***

Findings: The applicant has submitted the above-mentioned information herewith.

- (4) Pre-application conference written summary, if a pre-application conference was required under SRC 300.310 (a) and Table 300-2; or copy of the approved pre-application conference waiver, if such approval was granted pursuant to SRC 300.310(b);***

Findings: A pre-application conference for this project occurred on April 13th, 2020. The applicant has submitted the Pre-application written summary herewith.

- (5) A statement as to whether any City-recognized neighborhood associations whose boundaries include, or are adjacent to, the subject property were contacted in advance of filing the application and, if so, a summary of the contact. The summary shall include the date when contact was made, the form of the contact and who it was with (e.g., phone conversation with neighborhood association chairperson, meeting with land use committee, presentation at neighborhood association meeting), and the result;***

Findings: The applicant contacted the Grant Neighborhood Association and has submitted a summary of contact herewith.

- (6) For applications requiring neighborhood association contact under SRC 300.310, a copy of the required e-mail or letter to the neighborhood association, and a list of the e-mail or postal addresses to which the e-mail or letter was sent;**

Findings: The Comprehensive Plan amendment does not require neighborhood association contact. However, the Zone Change proposed does. Applicant contacted the Grant Neighborhood Association and has submitted proof herewith.

- (7) For applications requiring an open house under SRC 300.320:**

- (A) A copy of the sign-in sheet for the open house and a summary of the comments provided; or**
- (B) When a neighborhood association meeting has been substituted for a required open house, a summary of the comments provided at the neighborhood association meeting;**

Findings: The Applicant conducted an Open House May 5th, 2020 and has submitted required documentation herewith.

- (8) A statement as to whether the Salem-Keizer Transit District was contacted in advance of filing the application; and if so, a summary of the contact. The summary shall include the date when contact was made, the form of the contact, who it was with, and the result;**

Findings: The applicant contacted the Salem-Keizer Transit District and has submitted the required summary herewith.

- (9) A written statement addressing each applicable approval criterion and standard;**

Findings: Submitted here.

- (10) For Type II, Type III, and applicant initiated Type IV applications involving property subject to an active and duly incorporated Homeowner's Association (HOA)**

registered with the Oregon Secretary of State which includes an identified registered agent, the HOA name and mailing address for the registered agent.

Findings: 78704385, Evergreen Presbyterian Church in Salem, Domestic Non-Profit Corporation located 905 COTTAGE ST NE, SALEM, OR 97301.

(11) For applications for affordable multiple family housing where a 100-day state mandated decision date is sought, a draft copy of the covenant required under ORS 197.311 restricting the owner, and each successive owner, of the development or a residential unit within the development from selling or renting any of the identified affordable residential units as housing that is not affordable housing for a period of 60 years from the date of the certificate of occupancy.

Findings: Not applicable.

(12) Any additional information required under the UDC for the specific land use action sought;

(13) Any additional information, as determined by the Planning Administrator, that may be required by another provision, or for any other permit elsewhere, in the UDC, and any other information that may be required to adequately review and analyze the proposed development plan as to its conformance to the applicable criteria;

Findings: No additional information required under the Unified Development Code for the specific land use action identified. Applicant will respond to additional requests of the Planning Administrator accordingly.

(14) Payment of the applicable application fee(s) pursuant to SRC 110.090.

Findings: Applicant submits payment herewith.

Sec. 300.300. - Pre-application conference

(b) Applicability

- (1) Pre-application conferences are mandatory for those land use actions identified under Table 300-2 as requiring a pre-application conference.**

Findings: A pre-application conference for this project occurred on April 13th, 2020.

Sec. 300.310. - Neighborhood association contact

(c) Process. Prior to submitting a land use application requiring neighborhood association contact, the applicant shall contact the City-recognized neighborhood association(s) whose boundaries include, or are adjacent to, the subject property via e-mail or mailed letter. The e-mail or mailed letter shall:

- (1) Be sent to the chair(s) and land use chair(s) of the applicable neighborhood association(s) prior to submitting the land use application; and**
- (2) Contain the following information:**
 - (A) The name, telephone number, and e-mail address of the applicant;**
 - (B) The address of the subject property;**
 - (C) A summary of the proposal;**
 - (D) A conceptual site plan, if applicable, that includes the proposed development; and**
 - (E) The date on which the e-mail or letter is being sent;**

(d) Effect on subsequent land use application submittal. A land use application requiring neighborhood association contact shall not be accepted, as provided under SRC 300.210, unless it is accompanied by a copy of the e-mail or letter that was sent to the neighborhood association, and a list of the e-mail or postal addresses to which the e-mail or letter was sent.

Findings: The applicant contacted the Grant Neighborhood Association and has submitted proof herewith.

Sec. 300.320. - Open house

(a) Purpose. The purpose of an open house is to provide an opportunity for applicants to share plans for certain types of proposed land use applications with the public in advance of the applications being submitted. This encourages dialogue and provides opportunities for feedback and resolution of potential issues prior to filing.

(b) Applicability.

- (1) An open house, as provided in this section, is required for those land use applications identified under Table 300-2 as requiring an open house.***
- (2) When multiple land use applications are consolidated into a single application and one or more of the applications involved include a requirement for an open house and the other applications require a combination of neighborhood association contact or no neighborhood association contact, the entire consolidated application shall require an open house.***

(c) Process. Prior to submitting a land use application requiring an open house, the applicant shall arrange and attend one open house for the purpose of providing the applicant with the opportunity to share their proposal with the neighborhood and surrounding property owners and residents prior to application submittal. The open house shall be open to the public and shall be arranged, publicized, and conducted as follows:

- (1) Date and time. The public open house shall be held:***
 - (A) Not more than 90 days prior to land use application submittal and at least seven days after providing notice as required under SRC 300.320(c)(3) and (c)(4);***
 - (B) At a time between 5:30 p.m. and 9:00 p.m. Monday through Friday, or between 9:00 a.m. and 9:00 p.m. on Saturday or Sunday; and***
 - (C) Shall not be held on a legal holiday.***
- (2) Location. The open house shall be held:***
 - (A) Within the boundaries of the City-recognized neighborhood association the property is located within or within two miles of the subject property; and***
 - (B) In a location where there is an accessible route from outside the building to the space where the open house will be held.***
- (3) Written notice. Written notice of the public open house is required and shall be provided as follows:***
 - (A) The applicant shall provide written notice of the public open house a minimum of seven days prior to the public open house to:***

- (i) Any City-recognized neighborhood association(s) whose boundaries include, or are adjacent to, the subject property; and*
- (ii) The Planning Administrator.*

(4) Posted notice. *Posted notice of the public open house is required and shall be provided as follows:*

(A) *The applicant shall post notice on the property affected by the proposal a minimum of seven days prior to the open house.*

(d) Open house requirements. *The applicant shall provide a sign-in sheet at the open house requesting the name, address, telephone number, and e-mail address of those in attendance.*

(e) Effect on subsequent land use application submittal. *A land use application requiring an open house shall not be accepted, as provided under SRC 300.210, unless it is accompanied by a copy of the sign-in sheet from the open house and a summary of the comments provided.*

Findings: The Zone Change proposed does not require an Open House. However, the Comprehensive Plan amendment does. The Applicant conducted an Open House May 5th, 2020 according to the above-mentioned requirements and has submitted the documentation herewith.

PART II | Salem Area Comprehensive Plan

SALEM COMPREHENSIVE POLICIES PLAN – II. DEFINITIONS AND INTENT STATEMENTS

A. LAND USE PLAN MAP (Comprehensive Plan Map):

1. Intent:

This pattern, as represented on the Comprehensive Plan Map, indicates areas appropriate for different types of land use. The pattern takes into consideration the transportation network, the location of public facilities and utility systems, and the needs of the people which are important to the creation and maintenance of a healthful and pleasing urban environment. To ensure that the anticipated urban land use needs are met, the Plan Map demonstrates a commitment that land for a wide variety of uses will be available at appropriate locations as needed. There are two approaches to achieving this commitment. One approach is the rezoning of land in quantities sufficient to accommodate land use demands identified for the planning period. However, it presumes that sufficient knowledge is available to identify market conditions twenty years hence. It runs the risk of artificially inflating land prices, diminishing the economic life of the present use, and designating property for more intensive use before public facilities and services are available.

Findings: The proposed use preserves the existing buildings while taking into considerations the existing transportation network, location of the public facilities and utility systems, and the needs of the community. Property values of the surrounding community are not expected to change due to the rezoning as the existing fabric and character of the neighborhood remain unchanged. See [Part I](#) and the Transportation Planning Rule Analysis submitted herewith for more information regarding the transportation network and public facilities. See also Grant Neighborhood Community Plan [findings](#).

3. Plan Map Designations:

The Comprehensive Plan Map is a representation of the Plan's goals and policies. The Plan map designations indicate various types of land use. Descriptions of the Plan Map designations follows.

a. Residential

b. Mixed-Use

c. Commercial

The predominant use in these areas is commercial. Multifamily residential may be included where appropriate. This designation indicates commercial areas throughout the Salem urban area that provide shopping and service opportunities of the following types:

- ***Regional shopping facilities***
- ***Community and neighborhood shopping and service facilities***
- ***Convenience stores***
- ***Commercial offices***
- ***Specialized shopping and service facilities***

Commercial Offices accommodate office space and non-retail services.

Findings: The proposed plan map designation is Commercial to accommodate resident service offices within the existing single-family Residence. The primary proposed use is multi-family housing. Properties directly south of the subject property are designated as Multi-Family Residential according to the Salem Comprehensive Plan map, indicating that multi-family is appropriate for subject properties. The proposed designations also allow for an increase in the existing housing stock, maintain the overall land use pattern of the surrounding urban area, stabilize and protect the essential characteristics of the existing residential environment, and permit multifamily housing developments to blend into the overall fabric of the Salem urban area.

B. SPECIAL RESOURCE INFORMATION

Special conditions which exist in some locations need to be recognized in order to develop in a satisfactory manner. The following outlines sources of information on these special conditions and resources.

- 1. Floodplains***
- 2. Geologic Conditions***
- 3. Soils***
- 4. Aggregate Resources***
- 5. Fish and Wildlife***
- 6. Willamette River Greenway Boundary***

7. Historic Resources

8. Airspace Obstruction Limitations

Findings: No special conditions or resources found on site. For additional information regarding historic character, see findings below in **Part III Oregon Statewide Planning Goals** ([Findings](#))

C. URBAN GROWTH POLICIES:

The intent of the urban growth policies is:

- 1. To contain urban development within planned urban areas where basic services such as sewers, water facilities, police and fire protection can be efficiently and economically provided.*
- 2. To conserve resources by encouraging orderly development of land.*
- 3. To preserve farmland and open space.*
- 4. To make more economical use of local tax dollars in locating facilities and providing services for the benefit of all citizens within the urban growth area. Since urban services are interrelated, coordination is best achieved by a single general purpose governmental unit.*
- 5. To provide property owners greater security in long-range planning and investments.*
- 6. To make it possible for utility extensions, transportation facilities, and schools to be designed and located so as to more closely match population growth.*
- 7. To preserve and enhance the livability of the area.*
- 8. To use public facilities and services as a framework for urban development.*

Findings: Site is an existing urban development within Salem's existing Urban Growth Boundary as established by the Salem Comprehensive Plan.

D. GROWTH MANAGEMENT PROGRAM:

The intent of a growth management program is to encourage urban development to occur in such a way that the expansion of urban services can be accomplished in a fiscally sound manner while still providing the required city services on an equitable basis to all community residents.

Findings: Site is an existing urban development with sufficient existing urban services.

E. ACTIVITY NODES AND CORRIDORS

The intent of Activity Nodes and Corridors is to encourage development to orient to the pedestrian, and provide accessibility to transit services, major roads, and connectivity with the surrounding neighborhood, while accommodating the use of the automobile.

Activity Nodes and Corridors are typically located on or near transit routes and arterial streets, providing for a variety of land uses. Activity Nodes and Corridors may be composed of continuous, narrow bands of denser development or concentrated development, typically located near major intersections, as shown on Map #1 (Page 51).

Findings: Existing building orientation, existing access to transit service, and existing connectivity to the surrounding neighborhood to remain. Proposed use includes increased parking availability on site. Subject properties located within ¼ mile of Salem's Transportation Core Network.

G. URBAN GROWTH BOUNDARY

2. All parties shall work toward the development of the most efficient and economical method for providing specific urban services to the area within the Salem/Keizer urban growth boundary.

Findings: See [above](#).

SALEM COMPREHENSIVE POLICIES PLAN – IV. SALEM URBAN AREA GOALS AND POLICIES

B. GENERAL DEVELOPMENT

GOAL: To ensure that future decisions concerning the use of land within the Salem urban area are consistent with State Land Use Goals.

Citizen Involvement

1. Opportunities for broad-based citizen involvement in the development, revision, monitoring and implementation of the Salem Area Comprehensive Plan shall be provided by the City of Salem and Marion and Polk Counties. Where neighborhood groups have been officially recognized by the governing body, they shall be included in the planning process. To help assure citizen participation and information, public hearings shall be held prior to adoption of all land use ordinances.

Findings: The applicant has contacted the Grant Neighborhood Association and conducted an Open House fulfilling the requirements for citizen involvement as required by Rezoning and Minor Comprehensive Plan Map Amendment.

Economic Growth

3. Economic growth which improves and strengthens the economic base of the Salem urban area should be encouraged.

Findings: Proposed use allows for permanent residence on site, increasing contributions to the economy more than the existing religious use. Fair Affordable housing allows families to move into areas where wages and employment prospects increase, therefore further stimulating the economic growth.

Cooperative Growth Management

6. All public and private development shall meet the requirements of applicable local, state and federal standards.

Findings: The applicant demonstrates subject properties proposed Zone Change and Minor Comprehensive Map change meet the requirements of applicable local, state, and federal standards in this written statement.

Optimal Use of the Land

7. Structures and their siting in all residential, commercial, and industrial developments shall optimize the use of land. The cumulative effect of all new residential development in the Salem urban area should average 6.5 dwelling units per gross acre of residential development.

Development should minimize adverse alteration of the natural terrain and watercourses, the potential for erosion and adverse effects upon the existing topography and soil conditions.

Findings: The proposed use optimizes use of the land by preserving existing structures. Subject properties support the ability to implement stormwater treatment infrastructures. Proposed parking lot development will minimize the potential for erosion and adverse effects upon the existing topography and soil conditions by utilizing Salem's Small Project Storm Water Design requirements.

Alternative Energy Sources

8. The city shall consider zoning and other site regulations for utilization of solar energy, wind power, on-site conversion of clean fossil fuels to electricity, and other renewable and increased efficiency alternatives.

Findings: Proposed use preserves existing buildings, increasing energy efficiency by lengthening the life cycle of the existing embodied energy.

Street Improvements

10. Improvements of streets in addition to those in or abutting a development may be required as a condition of approval of subdivisions and other intensifications of land use.

Findings: Subject properties sufficient to accommodate street improvements. Proposed use incorporates street improvements as required by the Salem Revised Code and the Public Works Department.

Handicapped Access

11. Buildings and facilities open to the public should be well designed to fulfill their specified function, taking into consideration the needs of handicapped persons.

Findings: Subject properties sufficient to accommodate universal access according to ADA and current building code standards. Proposed use includes the addition of ADA ramps to the rear of each building allowing universal access.

Development Compatibility

12. Land use regulations which govern the siting of any development shall encourage development to reduce its impact on adjacent properties by screening, landscaping, setback, height, and mass regulations.

Findings: Subject properties sufficient to accommodate developments to reduce impact on adjacent properties including screening, landscaping, and setbacks. Existing buildings located on subject properties comply with current height and mass regulations according to Salem Revised

Code Chapter 521. Proposed use includes new privacy fencing, landscaping, stormwater planters, street trees, and complies with setback requirements.

Designated Open Space

13. Land use regulations shall encourage public spaces, both natural and manmade for either active or passive enjoyment, including natural areas, open plazas, pedestrian malls, and play areas.

Findings: Subject properties sufficient to accommodate open space requirements according to the Salem Revised Code. Proposed use maintains existing front and site yards and adds additional landscape setbacks and stormwater planters.

Screening of Storage

14. Outdoor storage areas should be screened from the public streets and from adjacent uses.

Findings: Subject properties sufficient to accommodate screen of outdoor storage. Proposed use does not include outdoor storage. Proposed trash enclosure includes screening elements as required by Salem Revised Code and is location on the furthest corner of the parcels away from the public right away.

Lighting

15. Exterior lighting shall be designed to provide illumination to the site and not cause glare into the public right-of-way and adjacent properties.

Findings: Subject properties include only minimal existing exterior lighting. Exterior light fixtures mark each entry of the subject buildings and do not cause glare to the public right of way or adjacent properties. Proposed use includes the replacement of existing exterior light fixtures at their current location with higher energy efficiency yet similar light output.

C. URBAN GROWTH

GOAL: To ensure that the rate, amount, type, location and cost of development will preserve or enhance the City's quality of life and promote the City's efficient delivery of services.

Infill

4. Development of land with existing urban services shall be encouraged before the conversion of urbanizable lands to urban uses.

Findings: Subject properties are existing developed land with existing urban services. Proposed use increases density on site.

D. GROWTH MANAGEMENT

GOAL: To manage growth in the Salem urban area through cooperative efforts of the City of Salem and Marion and Polk Counties, to ensure the quality of life of present and future residents of the area, and to contain urban development and to preserve adjacent farm lands by:

b. Planning and developing a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban development.

Development Guided by Growth Management

1. Unless the City of Salem finds that existing water and sewer facilities have adequate capacity to accommodate new growth

Findings: Water and sewer facilities have adequate capacity for intended use. 8" existing sewer main in alley, 10" main water supply located in Cottage St, 1" H₂O service line to each building.

Programming Development

3. Criteria for the programming of development shall be as follows:

d. The willingness of the development community to assume the burden of funding the cost of providing certain facilities.

Infill Development

6. New developments shall make maximum use of available land areas with minimal environmental disturbance and be located and designed to minimize such public costs as extension of sewer and water services, schools, parks, and transportation facilities.

Development Requiring

Water and Sewer

7. Within the Salem urban area, residential subdivisions, mobile home parks, multi-family residential, commercial and industrial development shall be permitted only within

the County service districts or within the City of Salem where public sewer and water services are available and other urban facilities are scheduled pursuant to an adopted growth management program. Exceptions to this policy may only be permitted if mutually agreed to by the City and the appropriate County.

Infill on Facilities

9. New development shall be encouraged to locate in areas where facilities are already available and in areas which require the least public costs to provide needed facilities and services.

Findings: Subject properties include existing sewer and water services compliant with SRC Chapter 200 Urban Growth Management and maximize use of available land by allowing existing buildings on existing development to remain. This minimizes the public cost as the existing sewer, water services, and transportation services are sufficient for the proposed development. No proposed changes to the Salem Wastewater Management Plan, no proposed change to the Salem Water System Master Plan.

G. COMMERCIAL DEVELOPMENT

GOAL: To maintain and promote the Salem urban area as a commercial center for the Marion-Polk

GOAL: To maintain and promote the Salem urban area as a commercial center for Marion and Polk counties.

GOAL: To promote development of commercial office buildings for a range of employment uses, especially in downtown, mixed use districts, and commercially-oriented urban renewal areas.

GOAL: To promote commercial development that supports growth of traded-sector commercial employment.

Commercial Office Uses

6. Commercial office uses shall have direct access to collector and arterial streets or be located within one quarter mile of a collector or arterial street.

Findings: Proposed office use is minimal and will not change the fabric of the existing neighborhood, allowing the Salem urban area to remain as the commercial center for the

Marion-Polk and Marion Polk counties. Proposed use promotes buildings with a range of employment use within ¼ mile of the Core Network in the Salem Transportation System.

NEIGHBORHOOD PLAN – GRANT NEIGHBORHOOD PLAN

RESIDENTIAL

2. Multifamily: The intent is to maintain existing quality single family houses to the maximum extent practical while allowing conversion of houses and lots to multifamily densities where permitted by zoning.

Findings: Proposed zone change does not impact existing single family uses, existing use on site is currently special use for religious organizations.

COMMERCIAL

2. Commercial Office: The intent is to include a wide variety of nonretail services, These may be located near residential areas to serve the residents.

Findings: Proposed office use is minimal and will not change the fabric of the existing neighborhood. Proposed use of the Residence is comparable to existing use.

NEIGHBORHOOD WIDE GOALS AND POLICIES

1. GOAL: To conserve this close in location for single family living and to prevent encroachment on the single family core area from more intensive uses.

2. GOAL: To maintain and enhance the predominately single family residential character of this area to assure continued operation of Grant School as a neighborhood school and community facility.

Findings: Development south of subject properties are larger in scale and more intense in use. Preservation of existing Church and Residence allows subject properties to act as a Missing Middle Housing buffer between the larger scale uses and the single family residential lots to the north. This allows the predominantly single family residential character of the neighborhood and the Grant Neighborhood School to remain intact.

3. POLICY: Developers of multifamily or commercial uses should comply with the site design criteria listed below during the design review process specified in the North Salem Urban Renewal Plan. In addition, all property owners within 250 feet of the proposed project and a designated member of the Grant Executive Board should be notified in order to provide input to the Design Review Team.

- a. Parking - Off-street parking shall be provided to Code.**
- b. Noise Generation - Structures should be designed to protect occupants from noise levels exceeding HUD criteria.**
- c. Landscaping - All development shall be landscaped in accordance with renewal plan requirements.**
- d. Visual Impact - Parking lots, signs, and bright lights should be screened from residential areas.**

Findings: Development design remains a future item, proposed design concepts shared with the Grant Neighborhood Association during the Open House. Subject properties support the above-mentioned site design criteria. Proposed use includes site improvements providing additional off street parking lot, additional landscape buffers, and maintains existing historical visual impact. No new exterior lighting proposed. Religious services noise levels on site decrease due to proposed use, noise generation on site proposed meets HUD criteria.

4. POLICY: Primary access to new multifamily development in areas designated Multifamily should be onto major and local streets instead of alleys to prevent excessive traffic disruptions to existing single family houses.

Findings: Existing access remains. Subject properties existing access supports proposed use.

5. POLICY: Housing stock should be rehabilitated on a continuing basis. Low interest loans should be made available for this purpose.

Findings: Subject properties existing buildings to remain, proposed use increase Salem Affordable Fair housing stock.

6. POLICY: Architecturally and historically significant structures should be preserved

Findings: Subject properties existing buildings preserved with no increase in building footprint. Proposed use allows for the historical character of the neighborhood to remain intact.

7. POLICY: Zone changes that would allow more intensive residential uses in areas designated Single Family should be denied.

Findings: Proposed permanent affordable residences on site better align with the intended Single Family zone than the existing religious assembly use or potential uses such as a daycare facility or other conditional uses. Size and structure of the existing building are appropriate for the proposed use.

8. POLICY: Zone changes that would allow new commercial uses in areas designated Multifamily or Apartment will be opposed by the Neighborhood and should not be permitted. However, existing nonconforming uses should be allowed a zone change when requested, if those uses are found compatible with the surrounding area. The Neighborhood shall consider these on a case by case basis.

Findings: Existing Church designated special use under SRC for single family zones. Proposed zone change allows for preservation of the existing buildings maintaining subject properties compatibility with the surrounding area while bringing the use closer to the intended use of housing.

10. POLICY: Conversion of single family residences to multifamily use should be prohibited in areas designated Single Family.

Findings: Subject properties existing Residence and existing Church to remain. Proposed use supports commercial office and one single family residence within the existing Residence. Proposed use in existing Church includes approximately (14) dwelling units ranging in size from 230 to 647 square feet. There is an increasing concern the religious assembly use is not viable based on market trends and on-site physical limitations. However, the existing Church and Residence have significant historical character. Single Family use on site would most likely require redevelopment to occur, causing the loss of the Church and its historical character. CO

rezone allows the office function for the applicant, along with housing, which is a symbiotic relationship better suited for the property and maintaining the neighborhood character.

11.POLICY: Density per building site in areas designated Multifamily should be no more than permitted by the zone code.

Findings: Subject properties support Multifamily use under the requested Commercial Rezone. Subject properties existing buildings meet the density requirements of Salem Revised Code Chapter 521 Commercial Office Table 521-2 lot standards, Table 521-3 setback standards, and table 521-5 lot coverage and height.

16. POLICY: Single family housing should only be replaced with single family housing in areas zoned RS.

Findings: Single family Residence to remain.

SUB-AREA "C": GRANT RESIDENTIAL CORE

34. GOAL: To conserve close-in locations for single family living, to prevent the encroachment on the single family residential core from more intensive uses and to maintain and enhance the predominately single family residential character of this area.

Findings: Proposed use preserves existing Residence and existing Church with historic character as part of the Grant Neighborhood but allows interior reconfiguration to provide more flexible and accessible use supporting affordable housing units.

PUBLIC FACILITIES PLAN – SALEM STORMWATER MASTER PLAN

PURPOSE AND GOALS

The City of Salem Stormwater Master Plan addresses issues of stormwater quantity (i.e., conveyance and flood damage reduction) and stormwater quality in a manner that is compatible with the City's National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit. One major goal of the Master Plan project was to develop a Drainage System Improvement Plan (DSIP) for the storm drains, culverts, open channels, streams, detention storage, and conjunctive use (with detention, parks, etc.) water quality facilities.

The second major goal was to develop a Stormwater Management Program Plan (SMPP) consisting of the following:

- *The institutional aspects of stormwater management*
- *Listing and description of the new information needed for a successful comprehensive program*
- *Description of the financial concepts for implementing the program*
- *Evaluation of the current operations and maintenance level of service and recommendation of an adequate level of service*
- *Recommendation of changes from the City's existing stormwater program direction through the preparation of an "Existing Direction Report"*
- *Assistance to the City in establishing a public involvement program specifically for the project and for the stormwater management program in general*
- *Development of solutions to various stormwater problems, and in doing so, responding to six issue papers prepared by the City/consultant project team and the Stormwater Advisory Committee (SWAC)*
- *Finally, every effort has been made to reflect a balance between the need to safely and cost effectively move stormwater with the environmental and aesthetic needs and values associated with one of Salem's unique community amenities – its urban stream system.*

Findings: Proposed use allows existing buildings to remain but converts the existing unpaved gravel parking lot into an impervious surface. New impervious surface is approximately 4,400 SF of asphalt surface. Proposed use also includes the addition and an ADA ramp from the parking lot into the existing buildings. Nexus for small project stormwater requires is met, proposed use includes stormwater treatment through a new storm water planter.

PUBLIC FACILITIES PLAN – SALEM WASTEWATER MANAGEMENT PLAN

The 1996 Salem Wastewater Management Master Plan (adopted by the Salem City Council on December 16, 1996) outlined the requirements for providing wastewater service for existing and future customers for a 20-year period. The 1996 Master Plan principally focused on two primary issues: how to deal with wet weather flows, and how to treat wastewater loads. In addressing these two issues, the 1996 Master Plan identified

specific capital improvements for collection, conveyance, and treatment of the community's wastewater.

Findings: No proposed changes to the Salem Wastewater Management Plan. Subject properties existing wastewater services sufficient for existing use. No impact to the existing system as proposed use is lower impact than existing use.

PUBLIC FACILITIES PLAN – SALEM WATER SYSTEM MASTER PLAN

Plan Goals

The plan seeks to provide answers to these fundamental questions by explaining a range of factors: economics, regulations, water quality, reliability, flexibility, operations, environmental issues, and timing of improvements. The end product of the master plan is a list of recommended improvements, their estimated costs, and a schedule for implementing them. Some of the improvements are required by state and federal regulations; the number of standards for drinking water have increased more than three-fold since the mid-1980s and Salem, like most communities, will need to make changes to ensure compliance. But the majority of improvements will be to replace aging facilities that are wearing out, for growth and for reliability.

Findings: No proposed changes to the Salem Water System Master Plan. Subject properties existing water services sufficient for existing use. No impact to the existing system as proposed use is lower impact than existing use.

TRANSPORTATION SYSTEM PLAN

Comprehensive Transportation Policies

TRANSPORTATION

GOAL: To provide a balanced, multimodal transportation system for the Salem Urban Area that supports the safe and efficient movement of goods and people.

The Salem Transportation System Plan should contain the following plan elements:

Street System, Intercity Passenger Travel, Local Street Connectivity, Transportation Demand Management, Transportation System Management, Parking Management, Neighborhood Traffic Management, Freight Movement, Bicycle System, Transportation System Maintenance,

Pedestrian System, Transportation Finance, Transit System

Findings: Subject Properties are within ¼ mile of the Salem Transit Core Network. Per the Transportation Planning Analysis report, “based on the reasonable worst-case trip generation evaluation, the proposed zone change would result in a daily increase of less than 400 trips at each property. Therefore, even under the most conservative assumptions of potential development, it can be concluded that the proposed zone change will not significantly impact and would cause ‘no further degradation’ to the City of Salem transportation system.”

PART III | Oregon's Statewide Planning Goals

A Summary of Oregon's Statewide Planning Goals

1. CITIZEN INVOLVEMENT

Goal: To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

Findings: Citizen involvement according to the Salem Comprehensive Plan and Salem Revised Code submitted herewith, see [Part I](#) and [Part II](#).

2. LAND USE PLANNING

Goal: To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions.

PART I – PLANNING:

All land use plans and implementation ordinances shall be adopted by the governing body after public hearing and shall be reviewed and, as needed, revised on a periodic cycle to take into account changing public policies and circumstances, in accord with a schedule set forth in the plan. Opportunities shall be provided for review and comment by citizens and affected governmental units during preparation, review and revision of plans and implementation ordinances. Affected persons shall receive understandable notice by mail of proposed changes in plans or zoning ordinances sufficiently in advance of any hearing to allow the affected person reasonable time to review the proposal.

PART III – USE OF GUIDELINES:

2. Minor Changes

Minor changes, i.e., those which do not have significant effect beyond the immediate area of the change, should be based on special studies or other information which will serve as the factual basis to support the change. The public need and justification for the particular change should be established. Minor changes should not be made more frequently than once a year, if at all possible.

Findings: Applicant has submitted land use application in accordance with Salem's Rezone and Minor Comprehensive Plan Map Amendment process herewith.

5. OPEN SPACES, SCENIC AND HISTORIC AREAS AND NATURAL RESOURCES

Goal: To protect natural resources and conserve scenic and historic areas and open spaces.

Local governments and state agencies are encouraged to maintain current inventories of the following resources:

3. Historic Resources;

Findings: No natural, scenic, historic or open space resource found on site. Existing buildings not protected as historical resources. However, existing buildings contribute to historic character and presence in Grant neighborhood and are proposed to remain. Proposed exterior façade work only includes necessary alterations to satisfy current energy and fire and life safety requirements.

Guidelines

A. Planning

1. The need for open space in the planning area should be determined, and standards developed for the amount, distribution, and type of open space.

B. Implementation

1. Development should be planned and directed so as to conserve the needed amount of open space.

Findings: Open Space as defined by SRC Chapter 212.005 existing on site. Open space according to State and Federal Agencies and Open Space as defined by Statewide Planning Goals under Goal 8 not found on site. No new buildings proposed.

6. AIR, WATER AND LAND RESOURCES QUALITY

Goal: To maintain and improve the quality of the air, water and land resources of the state.

This goal requires local comprehensive plans and implementing measures to be consistent with state and federal regulations on matters such as groundwater pollution. All waste and process discharges from future development, when combined with such discharges from existing developments shall not threaten to violate, or violate applicable state or federal environmental quality statutes, rules and standards.

Findings: Site complies with local, state, and federal regulations for air, water, and land resources. Proposed use reduces impact on water and land resources, See [Part II](#) Salem Comprehensive Plan.

9. ECONOMY OF THE STATE

Goal: To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

Comprehensive plans for urban areas shall:

- 3. Provide for at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses consistent with plan policies;***
- 4. Limit uses on or near sites zoned for specific industrial and commercial uses to those which are compatible with proposed uses.***

Findings: See [Part II](#) Salem Area Comprehensive Plan

10. HOUSING

Goal: To provide for the housing needs of citizens of the state.

This goal specifies that each city must plan for and accommodate needed housing types, such as multifamily and manufactured housing. It requires each city to inventory its buildable residential lands, project future needs for such lands, and plan and zone enough buildable land to meet those needs. It also prohibits local plans from discriminating against needed housing types.

Guidelines

A. Planning

- 2. Plans should be developed in a manner that insures the provision of appropriate types and amounts of land within urban growth boundaries. Such land should be necessary and suitable for housing that meets the housing needs of households of all income levels.***
- 3. Plans should provide for the appropriate type, location and phasing of public facilities and services sufficient to support housing development in areas presently developed or undergoing development or redevelopment.***

B. Implementation

4. Ordinances and incentives should be used to increase population densities in urban areas taking into consideration (1) key facilities; (2) the economic, environmental, social and energy consequences of the proposed densities; and (3) the optimal use of existing urban land particularly in sections containing significant amounts of unsound substandard structures.

Findings: Subject properties are an existing development located within Salem's Urban Growth Boundary and are suitable for housing. Proposed use includes affordable housing units. Existing public facilities sufficient for proposed use. Proposed use increases density on site. See also [Part II](#) Salem's Comprehensive Plan.

11. PUBLIC FACILITIES AND SERVICES

Goal: To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

Findings: Existing public facilities and services suitable for urban use found on site. See also [Part II](#) Salem Area Comprehensive Plan

13. ENERGY

Goal: To conserve energy.

Goal 13 declares that "land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles."

Guidelines

A. Planning

1. Priority consideration in land use planning should be given to methods of analysis and implementation measures that will assure achievement of maximum efficiency in energy utilization.

2. The allocation of land and uses permitted on the land should seek to minimize the depletion of non-renewable sources of energy.

3. Land use planning should, to the maximum extent possible, seek to recycle and re-use vacant land and those uses which are not energy efficient.

4. Land use planning should, to the maximum extent possible, combine increasing density gradients along high capacity transportation corridors to achieve greater energy efficiency.

5. Plans directed toward energy conservation within the planning area should consider as a major determinant the existing and potential capacity of the renewable energy sources to yield useful energy output. Renewable energy sources include water, sunshine, wind, geothermal heat and municipal, forest and farm waste. Whenever possible, land conservation and development actions provided for under such plans should utilize renewable energy sources.

B. Implementation

1. Land use plans should be based on utilization of the following techniques and implementation devices which can have a material impact on energy efficiency:

- a. Lot size, dimension and siting controls;***
- b. Building height, bulk and surface area;***
- c. Density of uses, particularly those which relate to housing densities;***
- d. Availability of light, wind and air;***
- e. Compatibility of and competition between competing land use activities; and***
- f. Systems and incentives for the collection, reuse and recycling of metallic and nonmetallic waste.***

Findings: Proposed use allows existing buildings and embodied energy to remain, minimizing further use of non-renewable resources. Proposed use seeks to re-use existing buildings while implementing current energy efficiency requirements according the 2019 Oregon Zero Energy Ready Commercial Code for alterations to existing structures. Proposed use seeks to increase density of subject property with ¼ miles of the Salem Transportation Core Network.

14. URBANIZATION

Goal: To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

Findings: Site is an existing urban development within Salem's existing Urban Growth Boundary as established by the Salem Comprehensive Plan.