



December 29, 2021

VIA ELECTRONIC MAIL: kstraus@cityofsalem.net

Uploaded to PAC Portal

Kirsten Straus, Planner 1
City of Salem | Community Development
555 Liberty Street SE, Room 305
Salem, OR 97301

RE: Response to Incomplete Letter & Supplemental Written Statement (Hallman ES)
21-119953-RP and 21-119956-ZO
Our File No: 23583-31454

Dear Kirsten:

This letter is in response to the completeness review you conducted and issued on October 23, 2021 (the "***Incomplete Letter***") for Applicant's consolidated Class 3 Site Plan Review/Class 2 Adjustment Application for Hallman Elementary School, and additionally serves as Applicant's supplemental written statement in support of the consolidated application, where the two written statements conflict, please refer to this supplemental written statement as the controlling document. The Incomplete Letter requested that the Applicant address eight (8) items in order to deem the consolidated application as complete. Below is a summary of each item set out in bold and italics with Applicant's response in plain text below.

1. Lot Legality

Applicant's Response: Applicant will be submitting two (2) Lot Validation Applications, one for the School Parcel and one for the Parking Parcel. Applicant will also be submitting a Property Line Adjustment to consolidate the Subject Property into one (1) single unit of land.

Park Place, Suite 200
250 Church Street SE
Salem, Oregon 97301
Post Office Box 470
Salem, Oregon 97308

tel 503.399.1070
fax 503.371.2927

www.sglaw.com

2. *RS Development Standards (SRC 511.010) and Special Use Provisions (SRC 70.010) (Building Height)*

Applicant's Response: As part of its response, Applicant has uploaded a plan sheet (*Uploaded as 64-Exterior-Elevations-Plan*) that shows the exterior elevations of the proposed addition, which is twenty-four feet, six inches (24' 6") high at its tallest point.

3. *Portland-Fairgrounds Road Overlay (SRC 603)*

Applicant's Response: As part of this response, Applicant has provided an updated Site Plan Set (the "***Updated Site Plan***") (*Uploaded as 66-CIVIL-PLANS-SET-Hallman-10012021-REV01*) and a Landscaping Plan (*Uploaded as 63-Landscaping-Plan-Set-12232021*) identifying the following items: (1) a landscaping plan showing that the Proposed Development exceeds the 7% landscaping enhancement in accordance with SRC 603.020(j)(9); (2) the height of light structures, demonstrating the parking lot poles will be twenty five (25) feet in height and the pedestrian pathway lights will be twelve feet (12') in height, meeting the requirements in SRC 603.020(j)(8); and, (3) the type of fencing used, showing that there is no barbed wire or concertina wire on the Subject Property. The Landscaping Plan Set that Applicant has uploaded was designed by Jeff Creel, an Oregon landscape architect in conformance with SRC 603.020(j)(10). It also clarifies the status of the walkway that crosses the drive aisle as an elevated walkway, showing conformance with SRC 603.020(j)(6). Applicant has provided the required enhancements for the Proposed Development.

4. *Parking/Driveway (SRC 806.035-040)*

Applicant's Response: Applicant's Updated Site Plan uses curbs adjacent to the landscaping on the western side of the proposed parking area of the Parking Parcel, meeting this standard. The addition of bumper guards or wheel stops are not required.

5. *Landscaping (SRC 807.015-020)*

Applicant's Response: Applicant has provided the above referenced Landscaping Plan Set that shows compliance with the landscaping requirements, including noting the existing landscaping on the Subject Property.

6. *Adjustment Requests*

Applicant's Response: Since Applicant will be filing Lot Validation Applications and seeking to consolidate the lots through a Property Line Adjustment application, the Applicant is no longer requesting an adjustment to the zone-to-zone setback. Applicant requests that the Planner review the Application in accordance with the consolidated configuration.

SRC 522.020(d) Perimeter Landscaping Standard: Applicant has demonstrated on the Updated Site Plan that there is significant existing vegetation, including mature trees within the perimeter setback along the School Parcel's northern, eastern, and southern property lines. When considering the plant units within the totality of the perimeter setback, the Applicant significantly

exceeds the applicable landscaping standards for the setback. If an adjustment is required, the Applicant equally or better meets the standard. In the event the Planner determines that an adjustment is not needed, the Applicant defers to the Planner's determination.

SRC 806.015(d) Maximum Parking Standard: As indicated in Applicant's written statement, there is not an explicit purpose stated for the maximum parking standard, other than an inferred preference to avoid overdevelopment of parking lots. While Applicant acknowledges that the intent of the Portland Overlay is to "provide a better pedestrian experience," Applicant disagrees that the Proposed Development does not meet the intent of the zone. Upon development, Applicant will significantly exceed not only the CR landscaping standard, but also the Portland Overlay Enhancement standard. A significant amount of these landscaping units will be located adjacent to the sidewalks that extend along the Parking Parcel's frontage along Portland Road NE, providing an enhanced pedestrian experience along the Subject Property, in conformance with the intent and purpose of the zone. This is especially true when you look at the surrounding properties where similar enhancements have not occurred. Upon development, the Subject Property will provide enhanced landscaping along the pedestrian facilities, buffering from the proposed parking areas, as well as enhancements to the pedestrian experience along the Subject Property. Applicant previously provided the reasoning for the requested increase in parking stalls for the Proposed Use, the existing parking area is located within a developed neighborhood and does not provide adequate parking or circulation for safely dropping off and picking up students. Applicant is proposing a larger parking area to help meet this need, largely replacing the existing parking area for the majority of the staff, parents, and students while retaining the existing parking area for users coming in from the adjacent residential neighborhoods. The proposed adjustment provides adequate parking which is offset by extensive interior landscaping and pedestrian oriented pathways on a parcel that already exceeds the applicable landscaping standards. These mitigations allow for a proposed development that equally or better meets the purpose of the maximum parking standard by providing an enhanced pedestrian experience while also providing needed parking.

SRC 806.060(a)(1) Bicycle Parking Siting Standard: Staff identified that the upper parking area will not have access to bike parking due to the physical constraints of the Subject Property. Due to the traffic volume along Portland Road NE and the age of the students, Applicant believes there are safety concerns associated with the positioning of additional bicycle parking at this location rather than orienting bicyclists towards the bike parking that exists adjacent to the existing parking area. However, if Staff's position is that they will not approve the adjustment to the parking standard without additional bicycle parking at the new school entrance, Applicant is willing to provide minimal bicycle parking at that location.

7. General Comments

Applicant's Response: Applicant has provided notations on the Updated Site Plan identifying the total square footage, height, and location of all accessory structures proposed on the Subject Property. The portion of the Site Plan highlighted on page four (4) of the Completeness Review was textured concrete, intended to comply with Applicant's obligation to provide project enhancements.

8. Additional Land Use Applications Required

Applicant's Response:

Lot Validation: Applicant will submit any required lot validation applications outside of this response.

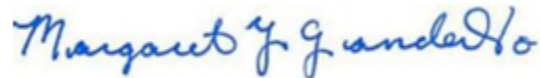
Property Line Adjustment: Applicant will apply for a property line adjustment outside of this response.

Class 2 Driveway Approach Permit: Applicant is using an existing driveway approach which is not being modified. Applicant confirmed with Public Works prior to submittal of the Application that Applicant is not required to obtain a Class 2 Driveway Approach Permit. That email chain has been uploaded as part of this response (*Uploaded as 57-DAP-Email-Chain*).

Class 3 Design Review: Applicant will apply for design review outside of this response.

The Applicant will be entering into a Memorandum of Understanding acknowledging that the lot validation and the property line adjustment may be processed separately from the SPR Application and that the applicable SPR criteria will be applied as if the Subject Property was a single, legal unit of land. As such, please deem the Application as complete and proceed with your review.

Sincerely,

A handwritten signature in blue ink that reads "Margaret Y. Gander-Vo".

MARGARET Y. GANDER-VO
margaret@sglaw.com
Voice Message #374

MYG:hst
Enclosures
cc: