

Glen Creek Village Two-Parcel Partition and PUD Modification

Date: April 2022

Submitted to: City of Salem
Planning Division
555 Liberty Street SE, Suite 305
Salem, Oregon 97301

Applicant: Salem Housing Authority
360 Church Street SE
Salem, OR 97301

AKS Job Number: 6163-12



3700 River Road N, Suite 1
Keizer, OR 97303
(503) 400-6028

I.	Executive Summary	2
II.	Site Description/Setting	2
III.	Applicable Review Criteria	2
	SALEM REVISED CODE	2
	Title X – Unified Development Code	2
	Chapter 205. – LAND DIVISION AND RECONFIGURATION	2
	Chapter 210. – PLANNED UNIT DEVELOPMENT.....	8
	Chapter 300. – PROCEDURES FOR LAND USE APPLICATIONS & LEGISLATIVE LAND USE PROPOSALS	10
	Chapter 510. – RA—RESIDENTIAL AGRICULTURE.....	12
IV.	Conclusion	13

Exhibits

- Exhibit A:** Application Form
- Exhibit B:** Preliminary Site Plan
- Exhibit C:** Neighborhood Association Contact
- Exhibit D:** Title Report
- Exhibit E:** Polk County Assessor's Map
- Exhibit F:** Recorded Deed
- Exhibit G:** Tree Inventory Form
- Exhibit H:** 1971 PUD decision

Glen Creek Village Two-Parcel Partition and PUD Modification

Submitted to:	City of Salem Planning Division 555 Liberty Street SE, Suite 305 Salem, Oregon 97301
Applicant:	Salem Housing Authority 360 Church Street SE Salem, OR 97301
Property Owners:	Salem Housing Authority 360 Church Street SE Salem, OR 97301
Applicant's Consultant:	AKS Engineering & Forestry, LLC 3700 River Road N, Suite 1 Keizer, OR 97303 Contact(s): Daisy Goebel Email: goebeld@aks-eng.com Phone: (503) 400-6028
Site Location:	1320 Orchard Heights Road NW, Salem
Polk County Assessor's Map:	07316CD, Tax Lot 1600
Site Size:	7.75 acres prior to partition
Land Use Districts:	Residential Agriculture (RA)

I. Executive Summary

The Salem Housing Authority (Applicant) is submitting this application for a two-parcel partition to separate an existing residential development from an area of land containing Glen Creek and an associated floodway and riparian area. Applicant intends to dedicate the resulting Glen Creek property to the City of Salem as a conservation parcel for the dual purposes of maintaining and preserving the site's existing natural resources and complying with federal Department of Housing and Urban Development funding requirements for properties located within the FEMA floodway. The site comprises ±7.75 acres entirely within the City's Residential Agriculture (RA) zoning district. The existing multifamily residential development was approved as a Planned Unit Development (PUD) by the Salem Planning Commission in 1971 and therefore requires a PUD modification to reduce the size of the existing PUD area.

The planned partition would result in the creation of an unbuildable parcel that will be donated to the City of Salem with such a deed restriction. No development is proposed with this application. Subsequently, no impacts to City streets or other public infrastructure will occur and the City may therefore find that preliminary grading, utility, or other plans to discuss future on- and off-site improvements is not warranted.

This application includes the City application forms, written materials, and preliminary plans necessary for staff to review and determine compliance with the relevant approval criteria. The evidence is substantial and supports the City's approval of the application.

II. Site Description/Setting

The site is located at 1320 Orchard Heights Road NW, in Salem, Polk County. The southern and eastern portions of the property include the Glen Creek floodway. Remaining portions of the site are developed with affordable housing that was approved by the City in 1971 as Planned Unit Development (PUD) Application No. 71-5. The development consists of seven buildings containing 32 multifamily units and two associated accessory structures. The surrounding lots comprise single-family residences except for Orchard Heights Park, across the street to the north, and Chandler Nature Area/Park abutting Glen Creek to the southwest. The lots to the south and west of the subject property are zoned Single Family Residential (RS), the lots to the east are zoned Duplex Residential (RD), and the lot to the north across Orchard Heights Road NW contains a City park in the Public Amusement (PA) zoning district.

III. Applicable Review Criteria

SALEM REVISED CODE

Title X – Unified Development Code

Chapter 205. – LAND DIVISION AND RECONFIGURATION

Section 205.005. – Partition tentative plan

- (a) **Applicability.** Except as provided in ORS 92.010(9), no land shall be divided into three or fewer parcels within a calendar year without receiving tentative partition plan approval as set forth in this section.

Response: This application requests a land partition that would result in two parcels. As demonstrated in this narrative, the application is in conformance with the requirements of this section.

-
- (b) Procedure type. A tentative partition plan is processed as a Type II procedure under SRC chapter 300.

Response: This partition plan is consolidated with a Type II PUD modification and will be processed as a Type II procedure following the requirements of Salem Revised Code (SRC) Chapter 300.

- (c) Submittal requirements. In addition to the submittal requirements for a Type II application under SRC chapter 300, an application for tentative partition plan shall include the information required in SRC 205.030.

Response: The requirements of SRC 205.030 are addressed in this narrative, below.

- (d) Criteria. A tentative partition plan shall be approved if all of the following criteria are met:

- (1) The tentative partition plan complies with the standards of this chapter and with all applicable provisions of the UDC, including, but not limited to the following:

- (A) Lot standards, including, but not limited to, standards for lot area, lot width and depth, lot frontage, and designation of front and rear lot lines;
- (B) City infrastructure standards; and
- (C) Any special development standards, including, but not limited to, floodplain development, special setbacks, geological or geotechnical analysis, and vision clearance.

Response: Salem Revised Code (SRC) Section 205.045 establishes special provisions for the creation and maintenance of conservation parcels. Certain of these special provisions waive standard lot dimensional and public improvement requirements that may be associated with a standard partition. To the extent they apply, the lot dimensional and related standards are met. Additional findings which justify the waiver of these standards are included later in this narrative.

- (2) The tentative partition plan does not impede the future use or development of the property or adjacent land.

Response: The purpose of the requested partition is to sever the floodway and associated riparian area from the developed portion of the site. The resulting floodway site will be dedicated to the City as a conservation parcel per SRC 205.045 and will not be developable in the future. Because this partition of the site is already rendered undevelopable by Federal and State Floodway protection rules, converting this portion of the site to a conservation parcel does not further impede development of this land. Similarly, the partition will not impede the development of abutting properties. This criterion is met.

- (3) Development within the tentative partition plan can be adequately served by city infrastructure.

Response: The existing development is currently served by City services. The conservation parcel will not be developed and therefore does not require connection to City infrastructure. This criterion is met.

- (4) The street system in and adjacent to the tentative partition plan conforms to the Salem Transportation System Plan.

Response: Orchard Heights Road NW is classified as a Minor Arterial. The Transportation System Plan includes a low-priority project to improve Orchard Heights Road to Minor Arterial standards. This application does not include any development-related impacts that would warrant the improvement of Orchard Heights Road, and subsequently such improvements are not planned as part of this application.

- (5) The street system in and adjacent to the tentative partition plan is designed so as to provide for the safe, orderly, and efficient circulation of traffic into, through, and out of the partition.

Response: The internal and adjacent vehicle and pedestrian circulation system is designed to serve the existing development at Glen Creek Village. This partition does not allow for further development of the site, and the resulting conservation parcel will not require additional access or transportation facilities.

- (6) The tentative partition plan takes into account the topography and vegetation of the site so the need for variances is minimized to the greatest extent practicable.

Response: The planned partition would result in the separation of the developed site from the undevelopable portion containing the Glen Creek floodway and riparian setback. No variances are required to account for the site's topography and vegetation. This criterion is met.

- (7) The layout, size, and dimensions of the parcels within the tentative partition plan take into account the topography and vegetation of the site, such that the least disruption of the site, topography, and vegetation will occur from the reasonable development of the parcels.

Response: The proposed partition will not create additional developable lots and dedicating the floodway parcel to the City as a conservation parcel will protect the environmental resources from future disruption. This criterion is met.

- (8) When the tentative partition plan is for property located more than 300 feet from an available sewer main, and the property will not connect to City water and sewer:
- (A) The property is zoned residential;
 - (B) The property has received a favorable site evaluation from the county sanitarian for the installation of an on-site sewage disposal system; and
 - (C) The proposed parcels are at least five acres in size and, except for flag lots, have no dimension that is less than 100 feet.

Response: The existing development is currently connected to City facilities including water and sewer. Planned Parcel 2 will not be eligible for development and is not subject to the above standards per SRC Section 205.045 – Special platting standards for conservation lots or parcels. The criteria do not apply.

- (e) Conditions of approval for partitions in areas unserved by City sewer. In addition to any conditions imposed pursuant to SRC 300.820, when the tentative partition plan is for property located more than 300 feet from an

available sewer main, and the property will not connect to City water and sewer, the following conditions shall be imposed:

- (1) The parcels shall only be used for residential purposes;
- (2) All buildings and structures shall meet required setbacks from future street rights-of-way; and
- (3) A non-remonstrance agreement shall be signed and recorded against the property agreeing to connect to the City's sewer and water systems when they become available, and waiving the right to object to any future City sewer and water project benefiting the property.

Response: The existing development is currently connected to City utilities, including water and sewer. Parcel 2 will not be eligible for development and is not subject to the above standards per SRC Section 205.045 – Special platting standards for conservation lots or parcels. The criteria do not apply.

- (f) Expiration. Tentative partition plan approval shall expire as provided in SRC 300.850, unless an application for final plat is submitted within the time limits set forth in SRC 300.850, or an extension is granted pursuant to SRC 300.850(b).

Response: The time limit and extension requirements of SRC Chapter 300 are understood.

Section 205.030. – Additional submittal requirements

Applications to subdivide, partition, or replat land shall include, in addition to the submittal requirements under SRC chapter 300, the following:

- (a) A tentative plan map, of a size and form and in the number of copies meeting the standards established by the Director, containing the following information:
 - (1) A title block on each sheet indicating the proposed subdivision or phased subdivision name, or, if available, the partition number; the names and addresses of the landowner; the names and addresses of the professional engineers or surveyors responsible for preparing the plan; date; and township, range and section of the subject property;
 - (2) Scale and north arrow;
 - (3) The location of all property lines within 50 feet of the perimeter of the subject property;
 - (4) The boundaries, dimensions, and area of each proposed lot or parcel;
 - (5) The location, width, and names of all existing streets, flag lot accessways, and public accessways abutting the perimeter of the subject property;
 - (6) The location, width, curve radius, grade, and names of all proposed streets, flag lot accessway, and public accessways;
 - (7) The location of all existing and proposed easements;
 - (8) The location, dimensions, and use of all existing and proposed public areas, including, but not limited to, stormwater management facilities and detention facilities;
 - (9) The location, dimensions, and use of any existing buildings and structures on the subject property, indicating which will remain and which will be removed;

-
- (10) The location of any canals, ditches, waterways, detention facilities, sewage disposal systems, and wells on the subject property, indicating which will remain and which will be removed or decommissioned;
 - (11) The location of any natural topographic features on the subject property, including, but not limited to, creeks, drainage ways as shown on the most recent USGS maps, wetlands as shown on the Local Wetland Inventory, and floodplains; and
 - (12) For subdivisions and phased subdivisions, site topography shown at five-foot contour intervals, or two-foot contour intervals for areas within a floodplain;

Response: A Tentative Partition and Existing Conditions Plan containing the above information is included in this application package as Exhibit B.

- (b) A current title report for the property;

Response: A current title report is included in this application package as Exhibit D.

- (c) A completed tree inventory on a form as provided by the Director and, if required under SRC chapter 808 a tree conservation plan;

Response: A tree inventory is included with this application as Exhibit G. This proposal will not result in the creation of a developable lot or the removal of trees on either of the resulting parcels, so a tree conservation plan is not warranted.

- (d) A geological assessment or geo-technical report, if required by SRC chapter 810;

Response: A geological assessment or geotechnical report is not required by SRC Chapter 810 because the subject site is not within the Moderate or High Landslide Hazard Risk areas.

- (e) A description of the proposed stormwater management system, including pre and post construction conditions, prepared in accordance with the Public Works Design Standards;

Response: This application does not include any planned improvements to the developed site, and the conservation parcel designation prevents future development on that portion of the site; therefore, this criterion is not applicable.

- (f) A schematic plan showing the location of existing and proposed city infrastructure;

Response: Existing City infrastructure is shown on the Preliminary Site Plan (Exhibit B). No new development is planned on the site at this time, and therefore no new City infrastructure is planned. This criterion is met.

- (g) A preliminary grading plan, for partitions, subdivisions, and phased subdivisions, when grading of the subject property will be necessary to accommodate the proposed development;

Response: Grading is not required to accommodate future development. This requirement does not apply.

- (h) For residentially zoned property, where the partition or subdivision will result in a lot or parcel that is one-half acre or larger, a plan for the lot or parcel showing the location of lot or parcel lines and other details of layout, and demonstrating that future further division of the lot or parcel may readily be

made without violating the development standards of the UDC and without interfering with the orderly extension and connection of adjacent streets.

Response: The planned partition intends to create a conservation parcel for the purpose of preserving environmentally sensitive lands which will not be developed or further divided. Per SRC 205.045, conservation parcels are not subject to minimum lot size standards and therefore the above requirement does not apply.

- (i) For partitions of property located more than 300 feet from an available sewer main, and the property will not connect to City water and sewer, a plan showing:
 - (1) The location of lot lines and other details of layout demonstrating that the further division and full development of the property to the urban densities allowed by the comprehensive plan may readily be made in conformance with the development standards of the UDC, and without interfering with the orderly extension and connection of adjacent streets.
 - (2) The approximate location of city infrastructure following full development to the urban densities allowed by the comprehensive plan.

Response: The proposed land division will not allow further development of the property. The above requirements do not apply.

- (j) For subdivisions and phased subdivisions:
 - (1) A completed trip generation estimate on forms provided by the City;
 - (2) A traffic impact analysis, if required under SRC chapter 803; and
 - (3) A statement from the County Surveyor approving the name of the subdivision or phased subdivision.

Response: This application does not include a subdivision or phased subdivision. The above requirements do not apply.

Section 205.045. – Special platting standards for conservation lots or parcels

Conservation lots or parcels are lots or parcels that are created as part of a partition, subdivision, phased subdivision, manufactured dwelling park subdivision, or replat for the purpose of preservation and management of significant natural resources through the sale or transfer to a public agency or a nonprofit entity. As used in this section, significant natural resources include, but are not limited to, areas of wildlife habitat, riparian areas, areas of sensitive ecological areas, or areas that contain rare or endangered species. Conservation lots or parcels proposed as part of a partition, subdivision, phased subdivision, manufactured dwelling park subdivision, or replat shall be approved subject to the following:

- (a) A conservation lot or parcel shall be primarily undeveloped and in a natural state.

Response: The conservation parcel created by the planned partition will be transferred to the City for preservation and management. The existing Glen Creek floodway area is undeveloped and remains in a natural state. This criterion is met.

- (b) A conservation lot or parcel shall have no minimum standards for lot area, width, depth, or frontage.

Response: The applicant understands that the proposed conservation parcel does not need to comply with minimum lot dimension standards.

- (c) A conservation lot or parcel shall be designated as such on the tentative plan and the final plat.

Response: The Tentative Partition Plan includes a conservation parcel designation, and the final plat will also preserve the requisite area as a designated conservation parcel in accordance with this section. The criterion is met.

- (d) The deed conveying the conservation lot or parcel shall contain a covenant that requires long-term preservation and management of the lot or parcel as a significant natural resource.

Response: Applicant is working with their legal counsel and City of Salem legal staff to establish such a covenant on Parcel 2. Prior to dedication, a deed for the conveyance of the conservation parcel in accordance with the above requirements will be available for review by City staff. The criteria can be met.

Chapter 210. – PLANNED UNIT DEVELOPMENT

Section 210.035. – Modification of approval

- (a) (...)

- (b) Modification of planned unit development final plan approval.

- (1) **Applicability.** The approval of a PUD final plan, with or without a land division, may be modified after its effective date if the proposed modification meets the criteria set forth in this section. Modifications that do not meet the criteria in this section require submittal of a new application for PUD final plan.
- (2) **Procedure type.** Modification of a PUD final plan approval is processed as a Type II procedure under SRC chapter 300.
- (3) **Submittal requirements.** In addition to the submittal requirements for a Type II application under SRC chapter 300, an application for modification of a PUD final plan approval shall include the information required under SRC 210.030(c).
- (4) **Criteria.** An application for modification a PUD final plan approval shall be granted if the following criteria are met.
 - (A) The proposed modification does not substantially change the original approval; and
 - (B) The proposed modification will not result in significant changes to the physical appearance of the development, the use of the site, and the impacts on surrounding properties.
- (5) **Expiration.** The effect of a modification upon the expiration period of the original approval, if any, shall be established in the modification decision.

Response: This application meets the criteria set forth in this section and the applicable submittal requirements are included. The proposed modification, a decrease in the size of the PUD area, does not substantially change the original approval, the physical appearance of the development, the use of the site, or the site's impacts on surrounding properties. The

conditions of approval included in the original decision (Planned Development Conditional Use Case No. 71-5) are below;

1. That the developer furnish satisfactory evidence that street improvements- paving, curbs and sidewalks- will be constructed to the specifications of the Director of Public Works
2. The [staff] also recommends that the Planning Commission, at this time, approve transfer of the planned unit development to the City of Salem at the discretion of the City (SRC 121.800).

These conditions of approval were satisfied at the time of initial site development in 1971, when the current building design, layout, improvements, and an applicable variance were approved. The above conditions are not impacted by the proposed modification; therefore, a new PUD final plan is not required. The original PUD decision and detail development plan approval is included with this application as Exhibit H. The above criteria are met.

Section 210.045. – Planned unit development standards

Planned unit developments must comply with the development standards set forth in this section.

- (a) **General development standards.** Planned unit developments shall conform to the general development standards set forth in Table 210-2.

Table 210-2 [abridged]	
Requirement	Standard
Min. # of Dwelling Units	No Minimum
Max. # of Dwelling Units	Zone Standard (85 for 7.88 acres; 56 for 5.5 acres)
Building setback from street	20 ft. Min. on arterial streets
Side yard building setback from PUD perimeter	Min. 5 ft., plus 1 ft. of height over 35 ft., up to 20 ft. in depth
Rear building setback	20 ft. for buildings greater than 1 story abutting an RS zoned lot
Building height	35 ft. Maximum

Response:

As shown in the table below, Parcel 1 will remain in compliance with the above standards after the planned partition. The conservation parcel is not subject to minimum lot area, width, depth, or frontage requirements per SRC 205.045 (b).

Requirement	Existing Development	Modified Parcel 1 Boundaries
Min. # of Dwelling Units	32	32
Max. # of Dwelling Units	32	32
Building setback from street	40+ ft.	40+ ft.
Side yard building setback from PUD perimeter	70+ ft.	5+ ft.
Rear building setback	50+ ft.	25+ ft.
Building height	±20 ft.	±20 ft.

Section 210.050. – Design standards for multiple family buildings

- (a) When one or more multifamily buildings are proposed within a PUD, the buildings shall conform to the following standards:
 - (1) Buildings shall not present excessive visual mass or bulk.
 - (2) Buildings shall not have long, monotonous exterior walls.
 - (3) Buildings shall be sited with sensitivity to topography and natural landform.
 - (4) Buildings shall be designed to provide an appropriate transition to abutting properties.
 - (5) Buildings shall utilize architectural elements and façade materials to provide visual interest and continuity with other buildings in the PUD.
 - (6) Individual private open space shall be provided for each dwelling unit.
 - (7) When abutting property zoned residential Agriculture (RA) or Single Family Residential (RS), an appropriate combination of landscaping and screening shall be provided to buffer between the multiple family building and the adjacent RA or RS zoned property.
- (b) For the purposes of this section, the term “multiple family building” means a building that contains three or more dwelling units.

Response: No new buildings are proposed within the PUD; therefore, the above standards do not apply.

Chapter 300. – PROCEDURES FOR LAND USE APPLICATIONS & LEGISLATIVE LAND USE PROPOSALS

Section 300.100. – Procedure types

Table 300-2. Land Use Applications by Procedure Type [Abridged]			
Application	Procedure Type	Application Pre-Submittal Requirements	Review Authority
Partition, Tentative Plan	II	Neighborhood Association Contact	Planning Administrator
PUD, Final Plan Modification	II	[None]	Planning Administrator

Section 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. Notwithstanding the provisions of this subsection, where multiple applications that are proposed to be consolidated include an application subject to review by the Historic Landmarks Commission, the application that is subject to Historic Landmarks Commission review shall be processed individually or concurrently.

Response: This consolidated application includes two procedures; a tentative partition plan and a PUD modification. Both are Type II procedures, decided by the Planning Administrator. The only pre-submittal requirement pertaining to the application is a neighborhood association contact, which was completed as described below.

Section 300.310. – Neighborhood Association Contact

- (a) **Purpose.** The purpose of neighborhood association contact is to provide an opportunity for neighborhood associations to learn of upcoming land use applications involving land within or adjacent to their boundaries in advance of applications being submitted. This encourages dialogue and provides opportunities for feedback and resolution of potential issues prior to filing.
- (b) **Applicability.**
 - (1) Neighborhood association contact, as provided in this section, is required for those land use applications identified under Table 300-2 as requiring neighborhood association contact.
 - (2) When multiple land use applications are consolidated into a single application and one or more of the applications involved include a requirement for neighborhood association contact and the other applications do not require neighborhood association contact, the entire consolidated application shall require neighborhood association contact.
 - (3) Nothing in this section shall be construed to preclude additional contact between an applicant and neighborhood association beyond the requirements of this section, or an applicant from contacting a neighborhood association where no neighborhood association contact is required.

Response: This consolidated Type II application is subject to the neighborhood association contact requirements of this section. Evidence of compliance with these requirements is included with this application as Exhibit C. This requirement is met.

- (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 email 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 email or letter is being sent;

Response: The neighborhood association contact letter, included as Exhibit C, contains the above information, and was sent to representatives of the West Salem Neighborhood Association on March 31, 2022.

- (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.

Response: A copy of the applicable correspondence and a list of recipients is included with Exhibit C to this application package. This criterion is met.

Chapter 510. – RA—RESIDENTIAL AGRICULTURE

Section 510.010. – Development standards

Table 510-2 Lot Standards			
Requirement	Standard	Existing Development	Modified Boundaries
Lot Area			
All other uses	Min. 6,000 sq. ft.	300,00+ sf	6.54+ ac
Lot Width			
All other uses	Min. 60 ft.	±600	500+ ft
Lot Depth			
All other uses	Min. 80 ft. Max. 300% of average lot width	±590	±520
Street frontage			
All other uses	Min. 60 ft.	±435	±367

Table 510-3 Setbacks			
Requirement	Standard	Existing Development	Modified Boundaries
Abutting Street (Minor Arterial)			
All Uses	Min. 20 ft.	±46 ft.	No Change
Accessory Structures (Minor arterial)			
All Uses	Min. 20 ft.	N/A	N/A
Interior Side Setback			
Buildings, all other uses	Min. 5 ft., plus 1 ft. for each 1 ft. of height over 35 ft., but need not exceed 20 ft. in depth.		
Interior Rear Setback			
All Uses	Min. 20 ft. if >1 story	±50 ft.	±27 ft.

Table 510-4 Lot Coverage; Height			
Requirement	Standard	Existing Development	Modified Boundaries
Lot Coverage			
All Other Uses	Max. 35%	±25%	±30%
Rear Yard Coverage			
All Uses	N/A	N/A	N/A
Height			
Buildings, all other uses	Min. 50 ft.	±20 ft.	No Change
Accessory Structures	Max. 15 ft.	<15 ft.	No Change

Response: As identified above, the reconfigured Parcel 1 will remain in compliance with the above standards following the partition and will not exacerbate any nonconforming development situation. The conservation parcel is not subject to minimum lot area, width, depth, or frontage requirements per SRC 205.045 (b).

[...]

IV. Conclusion

The required findings have been made and this written narrative and accompanying documentation demonstrate that the application is consistent with the applicable provisions of the City of Salem Unified Development Code. The evidence in the record is substantial and supports approval of the application. Therefore, the Applicant respectfully requests that the City approve this partition and PUD modification application.

Exhibit A: Application Form

Exhibit B: Preliminary Site Plan

Exhibit C: Neighborhood Association Contact

Exhibit D: Title Report

Exhibit E: Polk County Assessor's Map

Exhibit F: Recorded Deed

Exhibit G: Tree Inventory Form

Exhibit H: 1971 PUD Decision
