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RECOMMENDATION OF THE PLANNING COMMISSION

**ANNEXATION WITH COMPREHENSIVE PLAN MAP AND ZONE CHANGE CASE
NO. ANXC-763 -764 CPC-ZC25-02**

APPLICATION NO.: 25-113070-PLN

NOTICE OF RECOMMENDATION MAILING DATE: November 12, 2025

REQUEST: Annexation of an approximate 1.94-acre territory, including a Minor Comprehensive Plan Map Amendment to Multi-Family Residential, Zone Change to RM-I (Multiple Family Residential), and withdrawal from the Salem Suburban Rural Fire Protection District, for property currently zoned UT-5 (Urban Transition) in Marion County, designated Developing Residential on the Salem Comprehensive Plan Map, and located at 5524 Skyline Road S (Marion County Assessor’s Map and Tax Lot No. 083W17DB01600).

APPLICANT: Lantern Gate Properties, LLC (Kenneth Todd Coykendall, Tammy Coykendall, Ivan Coykendall)

LOCATION: 5524 Skyline Road S, Salem OR 97302

CRITERIA: Salem Revised Code (SRC) Chapters 260.010(g)(2) – Annexations with a minor comprehensive plan map amendment or quasi-judicial zone change; 64.025(e)(2) – Minor Comprehensive Plan Map Amendment; 265.005(e) – Zone Change

FINDINGS: The facts and findings are in the attached document dated November 12, 2025

RECOMMENDATION: Based upon the foregoing findings and conclusions, the Planning Commission RECOMMENDS to City Council that:

- A. The Minor Comprehensive Plan Map Amendment from “Developing Residential” to “Multiple Family Residential” be GRANTED;
- B. The Neighborhood Plan Map Amendment to “Multiple Family Residential” be GRANTED; and
- C. The zone change from Marion County UT-5 (Urban Transition) to City of Salem RM-I (Multiple Family Residential) be GRANTED and applied upon annexation of the property.

VOTE:

Yes 8 No 0 Abstain 0 Absent 0

Michael Slater, Planning Commission President

**NOTICE OF
RECOMMENDATION**

PLANNING DIVISION
PHONE: 503-588-6173
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Case Manager: Bryce Bishop, Planner III, bbishop@cityofsalem.net, 503-540-2399

The Salem City Council will hold a public hearing to receive additional evidence and testimony, and this recommendation of the Planning Commission and staff. After due deliberation, the City Council will make a final decision on the application. The appeal of the Council decision would be to the Oregon Land Use Board of Appeals. The appeal period is 21 days from the decision mailing date.

The complete case file, including findings, conclusions and conditions of approval, if any, are available for review at the Planning Division office, 440 Church Street SE, during regular business hours.

FACTS & FINDINGS

ANNEXATION / MINOR COMPREHENSIVE PLAN MAP AMENDMENT / ZONE CHANGE CASE NO. ANXC-764 CPC-ZC25-02

NOVEMBER 12, 2025

PROCEDURAL FINDINGS

1. On June 24, 2025, an application for an Annexation with a Minor Comprehensive Plan Map Amendment and Zone Change was submitted by Britany Randall, of BRAND Land Use, on behalf of the applicant and property owner, Lantern Gate Properties, LLC.
2. Pursuant to SRC 260.010(e)(2), an annexation with a minor comprehensive plan map amendment and zone change is processed as a Type IV land use application procedure under SRC Chapter 300. For annexations that involve a minor comprehensive plan map amendment and zone change, the Type IV land use procedures included under SRC 300.720 require that an initial public hearing be held with the Planning Commission for the purpose of reviewing and making a recommendation to the City Council concerning whether the requested minor comprehensive plan map amendment and zone change included with the annexation should be approved, approved with conditions, or denied. Pursuant to SRC 300.720(e), the Planning Commission's review and recommendation is limited to the requested comprehensive plan map amendment and zone change.

After the initial public hearing with the Planning Commission, a subsequent final public hearing is required to be held with the City Council who will review both the annexation request and the Planning Commission's recommendation concerning the comprehensive plan map amendment and zone change and issue a final decision.

3. After additional requested information was provided by the applicant, the application was deemed complete for processing on September 29, 2025. On October 14, 2025, notice of the public hearing on the proposal was subsequently sent, pursuant to SRC requirements; and on October 21, 2025, public notice of the proposal was posted on the subject property by the applicant.
4. DLCD Notice: State law (ORS 197.610) and SRC 300.720(b)(1) require the City to provide the Oregon Department of Land Conservation and Development (DLCD) a minimum 35-day notice when an applicant or the City proposes an amendment to an acknowledged Comprehensive Plan or land use regulation, or to adopt a new land use regulation. Required notice of the proposed Minor Comprehensive Plan Map Amendment and Zone Change was provided to DLCD on September 30, 2025.
5. On November 4, 2025, a public hearing was held before the Planning Commission to consider the applicant's requested Minor Comprehensive Plan Map Amendment and Zone Change. At the hearing the Planning Commission received staff's presentation and heard testimony from the applicant's representative and the public. Subsequent to the Commission's questions of staff, the hearing was closed and the Planning Commission voted to recommend to the City Council that the requested Minor Comprehensive Plan Map Amendment, Neighborhood Plan Map Amendment, and Zone Change be granted. D
6. State-Mandated 120-Day Local Decision Deadline: Pursuant to Oregon Revised Statutes

(ORS) 227.128, neither the requested annexation nor the requested minor comprehensive plan map amendment and zone change are subject to 120-date State-mandated local decision deadline.

PROPOSAL

The application under review by the Planning Commission is a consolidated application for an Annexation together with a Minor Comprehensive Plan Amendment and Zone Change for an approximate 1.94-acre property located at 5524 Skyline Road S (**Attachment A**).

The proposal includes a request to annex the property into the City of Salem and that upon annexation the Salem Area Comprehensive Plan Map designation of the property be changed from “Developing Residential” to “Multiple Family Residential” (**Attachment B**) and the zoning of the property be changed to RM-I (Multiple Family Residential) (**Attachment C**).

SUMMARY OF RECORD

The following items are submitted to the record and are available: 1) All materials and testimony submitted by the applicant, including any applicable professional studies such as traffic impact analysis, geologic assessments, and stormwater reports; 2) Any materials, testimony, and comments from public agencies, City Departments, neighborhood associations, and the public; and 3) All documents referenced in this report.

All application materials are available on the City’s online Permit Application Center at <https://permits.cityofsalem.net>. You can use the search function without registering and enter the permit number listed here: 25 113070.

APPLICANT’S MATERIALS

Land use applications are required to include a statement addressing the applicable standards and approval criteria of the Salem Revised Code and must be supported by proof they conform to such standards and approval criteria. The plans submitted by the applicant depicting the proposed development, and in support of the proposal, are attached to this report as follows:

- Existing Conditions Plans: **Attachment D**

The written statement provided by the applicant addressing the applicable approval criteria associated with the proposal is included as **Attachment E**.

SUBSTANTIVE FINDINGS

1. Existing Conditions

The subject property included with this proposal is approximately 1.94-acres in size and located at 5524 Skyline Road S. The property is also an enclave that is completely surrounded by the City limits along its northern, eastern, southern, and western boundaries.

As shown on the existing conditions plan submitted by the applicant (**Attachment D**), the site is currently developed with a single-family dwelling and associated accessory structures.

Trees:

As shown on the applicant's existing conditions plan, there are various existing trees located throughout the property.

Wetlands and Waterways:

According to the Salem-Keizer Local Wetland Inventory (LWI), there are no mapped wetlands or waterways present on the site.

Site Topography:

The topography of the site and surrounding area gradually slopes upward towards the southwest. According to the City's landslide hazard susceptibility maps, there are no areas of mapped landslide hazard susceptibility located on the subject property.

2. Salem Area Comprehensive Plan (SACP)

Comprehensive Plan Map: The subject property is designated "Developing Residential" on the Salem Area Comprehensive Plan (SACP) map.

The Comprehensive Plan designations of surrounding properties include:

Comprehensive Plan Designation of Surrounding Properties	
North	Single Family Residential
South	Single Family Residential
East	Single Family Residential
West	Multiple Family Residential

Relationship to Urban Service Area: The subject property lies outside the City's Urban Service Area. The Urban Service Area is that territory where all required public facilities (*streets, water, sewer, storm water, and parks*) necessary to serve development are in place or fully committed to be extended.

Pursuant to the urban growth management requirements contained under SRC Chapter 200 (Urban Growth Management), properties located outside the Urban Service Area are required to obtain an Urban Growth Preliminary Declaration if development will proceed prior to the necessary public facilities being extended to the property and the Urban Service Area being expanded to incorporate the property. Because the property is located outside the Urban Service Area, an Urban Growth Preliminary Declaration will be required for future development of the property.

Neighborhood Plan: Although the subject property is currently located outside the City

limits, the property is located within the boundaries of the Sunnyslope Neighborhood Association. The generalized land use map of the Sunnyslope Neighborhood Plan identifies the property as being designated Single Family, which is different from the property’s current Developing Residential designation under the Salem Area Comprehensive Plan. Pursuant to SRC 64.310(b), when there is a conflict between an adopted neighborhood plan and the Salem Area Comprehensive Plan, the Salem Area Comprehensive Plan shall control. As such, because the land use designation for the property on the neighborhood association generalized land use map is different from the property’s designation on the Salem Area Comprehensive Plan Map, the property’s Developing Residential comprehensive plan map designation applies to the neighborhood plan as well.

Because the proposal includes a minor comprehensive plan map amendment to change the Salem Area Comprehensive Plan Map designation of the property from Developing Residential to Multiple Family Residential, it also includes a corresponding amendment to the neighborhood plan map of the Sunnyslope Neighborhood Plan from Developing Residential to Multiple Family Residential.

3. Zoning

The subject property is currently zoned UT-5 (Urban Transition) in Marion County. Zoning of surrounding properties includes the following:

Zoning of Surrounding Properties	
North	City of Salem RS (Single Family Residential)
South	City of Salem RS (Single Family Residential)
East	City of Salem RS (Single Family Residential)
West	City of Salem RM-I (Multiple Family Residential)

4. Neighborhood Association and Public Comments

The subject property is located within the boundaries of the Sunnyslope Neighborhood Association.

Applicant Open House / Neighborhood meeting: SRC 300.320 requires the applicant for a proposed annexation with a comprehensive plan map amendment and zone change to either arrange and attend an open house or present their proposal at a regularly scheduled meeting of the neighborhood association. The applicant presented their proposal at a regularly scheduled meeting of the Sunnyslope Neighborhood Association on March 20, 2025; therefore, satisfying this requirement.

Neighborhood Association Comments: Notice of the application was provided to the Sunnyslope Neighborhood Association pursuant to SRC 300.720(b)(2)(A)(i)(gg), which requires notice to be sent to any City-recognized neighborhood association whose boundaries include, or are adjacent to, the subject property. No comments were received from the neighborhood association.

Public Comments: In addition to providing notice to the neighborhood association, notice was also provided, pursuant to SRC 300.720(b)(2)(A)(i)(bb), (cc), (hh), & (ii), to property owners and tenants within 250 feet of the subject property. Prior to the public hearing one comment was received, which is included as **Attachment F**; and public testimony was also provided at the public hearing. Comments received expressed concern, in summary, regarding the following:

- A. **Traffic safety on Skyline Road S.** The comment received expresses concern about the speed of traffic on Skyline Road S. It is indicated that as a result of recent multi-family residential development along Skyline Road in the area, and multiple turn-ins, turn-outs, and bike lanes that have added to this narrow roadway, it has become clear that the current speed limit of 45 MPH in this section creates unnecessary dangers for the new residents in this area of South Salem. It is explained that many people drive through the area at 55 MPH, which is much too dangerous for the pedestrian / children / bicycle activity and traffic that will accompany the increase residential housing densities proposed. The comment recommends that improved traffic controls be considered for this area and that the speed limit on Skyline Road should be limited to 35 MPH or less, as that is the speed limit on the section of Skyline Road immediately north of this area. It is also recommended that a stop sign at the intersection of Skyline and Davis Road would be very helpful.

Staff Response: Skyline Road S is classified as a minor arterial street according to the *Salem Transportation System Plan (TSP)*. The posted speed limit along Skyline Road S is 45 miles per hour (MPH), which is consistent with the speed limit for an arterial roadway according to the Public Works Design Standards (PWDS).

Speed zones on all streets in Oregon (*including those in the City of Salem*) are established by the Oregon Department of Transportation (ODOT). The process to establish a speed zone is for the requestor to contact and attend their neighborhood association meeting and request their support to change the speed limit on Skyline Road S. The neighborhood association will then contact the City's Traffic Engineering Department and inform staff of their request to initiate an investigation. Upon receipt of a request from the Neighborhood Association, The City contacts ODOT to conduct a speed zone investigation for that roadway. If the speed data meets the criteria for a reduction, a speed zone order will be issued by ODOT and the City will install the new speed limit signs.

Additional information regarding the ODOT process for speed zones can be found at <https://www.oregon.gov/odot/Engineering/Pages/Speed-Zones.aspx>. As the City cannot control ODOT's decision to lower the speed of the roadway, speed limits on adjacent streets are not subject to the City's land use process.

- B. **Height of future buildings.** Testimony was provided at the public hearing expressing concern about the potential heights of buildings within the future multiple family development on the property.

Staff Response: Because the proposal being considered at this time is only the annexation of the property into the City and its comprehensive plan map designation and corresponding zoning upon annexation, specific plans for the future development

of the property have not been submitted. Future development of the property will require site plan review and multiple family design review approval. At the time of these subsequent required land use approvals, the development will be reviewed for conformance with the applicable development standards of the Salem Revised Code (SRC), which include requirements for maximum building height and minimum setbacks from abutting properties. Within the RM-I zone (*per SRC 513.010(e) – Table 513-6*), the maximum allowed building height for multiple family developments is 35 feet. This maximum allowed building height is the same as the maximum 35-foot building height allowed for single family dwellings on the abutting RS (Single Family Residential) zoned properties to the north, east, and south of the subject property.

Homeowners' Association: Pursuant to SRC 300.720(b)(2)(A)(i)(ff), notice is required to be provided to any active and duly incorporated Homeowners' Association (HOA) applicable to the property. As identified in the application materials submitted by the applicant, the subject property is not located within a Homeowners' Association.

5. City Department Comments

- A. The City of Salem Building and Safety Division reviewed the proposal and indicated they have no comments.
- B. The City of Salem Fire Department reviewed the proposal and did not identify any concerns regarding the proposed comprehensive plan map amendment and zone change.

6. Public Agency Comments

- A. The Salem-Keizer School District reviewed the proposal and provided comments that are included as **Attachment G**. The School District indicates, in summary, that the property is served by Liberty Elementary School, Crossler Middle School, and Sprague High School. The School District identifies sufficient existing school capacity at Liberty Elementary School, Crossler Middle School, and Sprague High School to accommodate the projected increase in student enrollment resulting from the future development of the property.

The School District indicates that students will be eligible for school provided transportation to Liberty Elementary School, Crossler Middle School, and Sprague High School.

DECISION CRITERIA FINDINGS

7. Analysis of Minor Comprehensive Plan Map Amendment Approval Criteria

Salem Revised Code (SRC) 260.010(g)(2)(B)(i) establishes the approval criteria for a Minor Comprehensive Plan Map Amendment with an annexation. The following subsections are organized with approval criteria shown in ***bold italic***, followed by findings of fact evaluating the proposal's conformance with the criteria. Lack of compliance with the following criteria is grounds for a recommendation of denial of the Minor

Comprehensive Plan Map Amendment and neighborhood plan map amendment.

SRC 260.010(g)(2)(B)(i): The proposed minor comprehensive plan map amendment complies with the minor comprehensive plan map amendment approval criteria of SRC 64.025(e)(2), when the annexation includes a minor comprehensive plan map amendment.

The minor comprehensive plan map amendment approval criteria of SRC 64.025(e)(2) are as follows:

64.025(e)(2)(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.***
- (ii) Equally or Better Suited Designation. A demonstration that the proposed designation is equally or better suited for the property than the existing designation.***
- (iii) Conflict Between Comprehensive Plan Map Designation and Zone Designation. A Minor Plan Map Amendment may be granted where there is conflict between the Comprehensive Plan Map designation and the zoning of the property, and the zoning designation is a more appropriate designation for the property than the Comprehensive Plan Map designation. In determining whether the zoning designation is the more appropriate designation, the following factors shall be considered:***
 - (aa) Whether there was a mistake in the application of a land use designation to the property;***
 - (bb) Whether the physical characteristics of the property are better suited to the uses in the zone as opposed to the uses permitted by the Comprehensive Plan Map designation;***
 - (cc) Whether the property has been developed for uses that are incompatible with the Comprehensive Plan Map designation; and***
 - (dd) Whether the Comprehensive Plan Map designation is compatible with the surrounding Comprehensive Plan Map designations.***

Finding: The written statement provided by the applicant addressing the approval criteria is included as **Attachment E**. The applicant indicates, in summary, that the proposed minor plan map amendment from “Developing Residential” to “Multiple Family Residential” is justified under SRC 64.020(e)(2)(A)(ii), which allows for a change when the proposed designation is equally or better suited for the property than the existing designation. The Developing Residential designation is a transitional classification applied to properties within the Urban Growth Boundary that have not yet been annexed or assigned a more specific residential land use designation. It is not intended to serve as a long-term designation once urban services are available and urban development is appropriate.

The subject property is an enclave entirely surrounded by lands within the City of Salem. It has direct frontage on Skyline Road S and is located within an area that is urban in character and where public infrastructure, including water and sewer, can be readily extended. The Multiple Family designation is better suited to this location as it allows for medium-density residential development consistent with the physical characteristics of the site, the existing and planned development pattern of the surrounding area, and the City's policy goals for compact, efficient residential growth. The surrounding properties are designated and zoned for various forms of urban residential development, and the Multiple Family designation represents a logical extension of that pattern.

The proposed designation also supports the City's housing and growth management policies by facilitating the development of a broader range of housing types in areas where urban services are available. Therefore, the Multiple Family designation is better suited for the property than the existing Developing Residential designation, and this criterion is met.

Staff concurs with the findings included in the applicant's written statement. By providing for additional multiple family designated land, the proposed minor comprehensive plan map amendment responds to the changing social and demographic patterns within the City and the surrounding area that underly the multi-family housing needs identified in the City's adopted Housing Needs Analysis (HNA) and further supports compliance with statewide Planning Goal 10: Housing by increasing the amount of land inventory within Salem's portion of the UGB that generally requires the development of multi-family housing.

The proposed redesignation to "Multiple Family Residential" also provides for an equally or better suited comprehensive plan designation for the property than the existing "Developing Residential" designation because it provides for the more efficient utilization of the land within the UGB based on its size and proximity to other multiple family designed residential land to the west by allowing it to be developed for multi-family housing. This approval criterion is met.

SRC 64.025(e)(2)(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;

Finding: The written statement provided by the applicant indicates that the subject property is currently capable of being served with public facilities and services necessary to support the uses allowed under the proposed Multiple Family Residential comprehensive plan designation. The property is located within the Salem Urban Growth Boundary and is entirely surrounded by properties within city limits that are already served by public infrastructure, including water, sewer, stormwater, and transportation facilities.

Skyline Road S, which fronts the property along its northern boundary, is a public street improved to City standards and provides direct vehicular access. Water and sewer mains exist in the vicinity and can be extended to the property in accordance with City of Salem Public Works design and construction standards. The scale and configuration of the subject site are conducive to the orderly extension of urban services without requiring

extraordinary improvements or off-site extensions beyond typical expectations for urban development.

As part of the future development process, detailed utility plans will be prepared and reviewed by the City to ensure that all service capacity, design, and connection requirements are met. Based on the site's location and context, there are no known constraints that would preclude the provision of required urban services to support multi-family residential development under the proposed designation.

Staff concurs with the findings included in the applicant's written statement. The City's Development Services Division reviewed the proposal and indicated that there are existing public water, sewer, and storm mains in Skyline Road S available to serve the property. The Water System Master Plan, however, identifies inadequate reservoir capacity in this area and the subject property is not currently served by a neighborhood park, as identified in the Comprehensive Parks System Master Plan. In order to ensure the property is adequately served by public facilities and services, future development will require an Urban Growth Area (UGA) Preliminary Declaration to address public facilities required to serve subject property under the standards and requirements of SRC Chapter 200 (Urban Growth Management). In addition, site-specific infrastructure requirements associated with the future development of the property will be further addressed at the time of Site Plan Review under SRC Chapter 220. This approval criterion is met.

SRC 64.025(e)(2)(C): The proposed plan map designation provides for the logical urbanization of land;

Finding: The written statement provided by the applicant indicates that the proposed Multiple Family Residential plan map designation provides for the logical urbanization of land consistent with the goals and policies of the Salem Area Comprehensive Plan. The subject property is located within the Urban Growth Boundary and is entirely surrounded by properties already within the City of Salem. It is an unincorporated enclave with direct access to Skyline Road S and is adjacent to existing urban development, including residential neighborhoods and public infrastructure.

The current Developing Residential designation is intended as a transitional classification that anticipates future urban development but does not define the specific intensity or form of residential use. The proposed Multiple Family designation implements the next logical step in the urbanization process by identifying the property for medium-density residential development, which is appropriate given the site's proximity to existing urban services and compatibility with the surrounding residential land uses.

The Multiple Family designation will facilitate efficient infill development and allow the property to contribute to the City's broader housing objectives by supporting a range of housing types and densities in a location that is already largely urban in character. Urban services can be readily extended to the property, and its development will support the efficient use of infrastructure, consistent with the City's growth management policies. Therefore, the proposed Multiple Family designation provides for the logical urbanization of land.

Staff concurs with the findings included in the applicant's written statement. The subject property is an enclave property that is contiguous to the City limits on all sides and abuts multiple family development to the west. Future multiple family development of the property will be required to conform to the City's multiple family design review standards included under SRC Chapter 702, which ensure that multiple family development occurs in a manner that minimizes any potential impacts, and promotes compatibility, between the multiple family development and abutting single family zoned and used land. This approval criterion is met.

SRC 64.025(e)(2)(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

Finding: Analysis of the proposed comprehensive plan map amendment and zone change for conformance with the applicable Goals and Policies of the Salem Area Comprehensive Plan is as follows:

The written statement provide by the applicant indicates that the proposed Multiple Family Residential comprehensive plan designation is consistent with the Salem Area Comprehensive Plan (SACP) and with applicable Statewide Planning Goals and administrative rules adopted by the Oregon Department of Land Conservation and Development (DLCD). The Multiple Family designation supports the Comprehensive Plan's overarching goals to provide a variety of housing types, promote compact and efficient urban development, and direct growth to areas where public services are available.

The proposal directly advances Goal H 1 (Housing) of the SACP, which seeks to ensure a supply of residential land that accommodates a variety of dwelling types and densities. By redesignating the subject property from Developing Residential to Multiple Family Residential, the amendment supports the City's efforts to meet the housing needs of a growing and diverse population. It also furthers Goal H 2, which encourages infill development and the efficient use of land within the Urban Growth Boundary.

In addition to local policy consistency, the proposed designation aligns with several Statewide Planning Goals. It is consistent with Goal 10 (Housing), as it contributes to the inventory of land available for needed housing and supports a mix of housing types at urban densities. It complies with Goal 14 (Urbanization) by facilitating the orderly and efficient transition of land from rural to urban use within the existing Urban Growth Boundary. The property is surrounded by urban development and can be served by public facilities, consistent with Goal 11 (Public Facilities and Services) and Goal 12 (Transportation). The proposal also follows the established land use planning process consistent with Goal 1 (Citizen Involvement) and Goal 2 (Land Use Planning).

No Goal exceptions are required, as the land is within the acknowledged UGB and the proposed plan map change is consistent with the City's long-range planning framework. Therefore, the proposed land use designation complies with both the Salem Area Comprehensive Plan and all applicable statewide planning goals and administrative rules.

Staff concurs with the findings included in the applicant's written statement. The Multiple Family Residential designation under the Salem Area Comprehensive Plan is intended to promote medium and high-density housing distributed across the Salem area and is generally envisioned to apply near mixed-use and employment areas, low density residential areas, major transportation corridors, transit routes, parks, and schools.

The subject property abuts Skyline Road S. Skyline Road is classified as a minor arterial street for the section of the road abutting the property and the nearby surrounding area, but changes to a higher major arterial street classification further to the north at the intersection of Skyline Road and Summer Crest Drive. The redesignation of the subject property to Multiple Family Residential, and the corresponding zone change to RM-I (Multiple Family Residential), along this street is consistent with the Multiple Family Residential designation of the Comprehensive Plan and the development pattern of the area where multiple family land is located along this primary north-south transportation corridor and in relative close proximity (*less than one-half mile*) to transit service (*Cherriots Routes 8 and 18 – 12th / Liberty*) and mixed-use zoned land to the north near Kuebler Boulevard S and Skyline Road S.

The proposed Multiple Family designation and corresponding RM-I zoning are also consistent with the following goals Salem Area Comprehensive Plan goals and policies:

- **Housing Goal H1 – Housing Choice:** *Promote a variety of housing options to meet the needs, abilities, and preferences of all current and future residents.*
- **Housing Policy H1.1 – Housing Types:** *A variety of housing types shall be allowed and encouraged throughout the Salem Urban Area, including single-family homes, accessory dwelling units, manufactured homes, townhouses, middle housing, and multifamily housing.*
- **Housing Policy H1.5 – Housing Diversity:** *New residential developments should be encouraged to incorporate a diversity of housing types and sizes to attract residents of varying income levels, lifestyles, and housing preferences.*
- **Housing Goal H2 – Housing Affordability:** *Provide opportunities for housing that are affordable to current and future residents of all income levels.*
- **Housing Goal H3 – Land Supply:** *Provide a supply of residential land that accommodates the amounts and types of housing needed to meet the population forecast for the Salem Urban Area.*

The Multiple Family comprehensive plan designation and RM-I zoning proposed to be applied to the property upon annexation allow for a variety of housing types including middle housing (e.g. townhouses, duplexes, triplexes, fourplexes, and cottage clusters) and multi-family housing with dwelling unit densities of generally eight to 17-25 dwelling units per acre depending on the housing type. Redesignation of the land for multiple family will increase the City's multiple family land supply and allow for a mix of housing types to be provided in the area; thereby providing additional housing diversity, and options for housing choice and greater affordability, to help meet the projected housing needs of the City's diverse population consistent with these

applicable comprehensive plan goals and policies.

- **Housing Policy H5.3 – Health and Active Living:** *Multifamily housing and mixed-use projects should be encouraged to incorporate amenities supportive of healthy, active living, such as useable open space, community space, recreation areas, and community gardens.*

The City's development code includes design review standards that apply to multiple family development. Included within these standards are requirements to provide common open space and recreational opportunities to serve the residents of the development. Future development of the property will be reviewed for conformance with the applicable open space and recreational requirements of SRC Chapter 702. The proposal is therefore consistent with this applicable comprehensive plan policy.

- **Land Use and Urbanization Goal L1 – Urbanization and Growth Management:** *Manage growth in the Salem Urban Area through cooperative efforts between the City of Salem, Marion and Polk counties, and other jurisdictions to provide area residents with a high quality of life, contain urban development, promote the City's efficient delivery of services, and preserve adjacent agricultural lands.*
- **Land Use and Urbanization Policy L1.13 – Facility Responsibility:** *Where development creates a demand for new or expanded facilities and services, new development should bear a share of the costs of new or expanded facilities and services.*

Review of the proposal by the Development Services Division indicates that street, water, sewer, and storm drainage infrastructure are available and appear to be adequate to serve the property. Site-specific infrastructure requirements will be addressed at the time of future development and the costs for installation of required facilities are required to be paid by the applicant. The proposal is consistent with these applicable comprehensive plan goals and policies.

- **Land Use and Urbanization Goal L3 – Urban Development:** *Ensure that future development within the Salem Urban Area is designed to respond to and enhance the surrounding environment, while accommodating growth.*
The proposed multiple family comprehensive plan designation and RM-I zoning provide for additional land within the City to help meet the City's projected housing needs identified in the adopted Housing Needs Analysis, and the future development of the property will be required to comply with the applicable standards of the City's development code which includes standards to ensure development occurs in a manner that minimizes potential impacts and enhances the surrounding environment. The proposal is consistent with this applicable comprehensive plan policy.

Sunnyslope Neighborhood Plan

Although the subject property is currently located outside the City limits, the property is within the boundaries of the Sunnyslope Neighborhood Association. The Sunnyslope Neighborhood Association includes a neighborhood plan that was adopted by the City Council on August 8, 1983. Pursuant to SRC 64.015(a)(9), the "Goals and Policies"

provisions and the general land use maps adopted in neighborhood plans are considered components of the Salem Area Comprehensive Plan. The proposed Multiple Family designation and corresponding RM-I zoning are consistent with the following applicable goals and policies of the Sunnyslope Neighborhood Plan as follows:

- **Overall Policy 4 – Major Intersections:** *Intensive uses such as multifamily units, commercial office complexes, and neighborhood shopping should be clustered at major intersections in order to provide the exposure and access these uses require, and to reduce the amount of traffic through the neighborhood.*

Although not specifically located at a major intersection, the subject property is located along Skyline Road S, which is classified as a minor arterial street under the City's Transportation System Plan (TSP), and a little more than only one-half mile away from the major intersection of Skyline Road with Kuebler Boulevard S. The location of the property abutting Skyline Road, and its proximity to the intersection of Skyline Road and Kuebler Boulevard, ensures that the future multiple family development that would be allowed on the property under its proposed Multiple Family designation and RM-I zoning has access to a higher classification of street as provided for under this policy. Further, because all properties abutting the subject property are currently developed and the site has only one point of access to Skyline Road, vehicle access to the subject property will be taken directly from Skyline Road and any traffic resulting from the development of the property will not pass through the surrounding residential neighborhood. The proposal conforms to this neighborhood plan policy.

- **Multifamily Policy 9:** *The number of multifamily dwelling units should vary from seven units per acre in difficult terrain to 15 units per acre along arterials or at major intersections.*

The zoning that's proposed for the property in this case is RM-I (Multiple Family Residential). Of the City's multiple family zones, the RM-I zone has the lowest density requirements.

The residential densities discussed under the above identified neighborhood plan policy were established in 1983 before the establishment of the current allowed densities for residential development included in the City's development code. Allowed residential densities within the RM-I zone are established under SRC 513.010(c), Table 513-3, and are dependent on the specific type of housing provided. For example, the applicable density for townhouse development within the RM-I zone is 8 to 25 dwelling units per acre, and the density for multiple family development within the RM-I zone is 8 to 17 dwelling units per acre. The maximum allowed 17 dwelling unit per acre density requirement of the RM-I zone is just slightly over the 15-unit per acre density identified in the neighborhood plan for sites that do not include difficult terrain and are located along arterial streets, both of which are the case for the subject property. The proposal conforms to this neighborhood plan policy.

- **Multifamily Policy 10:** *Multifamily units should be located in concentrated locations on arterials or collectors and within one-fourth mile of an existing transit bus route. Primary locations will be in the vicinity of major intersections.*

The subject property is located along Skyline Road S, which is classified as a minor arterial Street under the City's Transportation System Plan; and the nearest transit service to the site is provided via Cherriots Routes 8 and 18 – 12th / Liberty at the intersection of Skyline Road and Summercrest Drive S.

As provided by this policy, the subject property is located on an arterial street and access to transit is located approximately 0.36 miles (1,904 feet) to the north of the property which is just 584 feet beyond the one-fourth mile distance discussed in this policy. Due to the property's location on an arterial street and its proximity to transit, the proposal conforms to this neighborhood plan policy.

- **Multifamily Policy 11:** *The principle access points to multifamily developments should be limited to arterial and collector streets except along arterials where direct street access is discouraged. In those cases, sole or primary access via a local street should be limited to the mid-point of the development nearest the arterial or collector.*

The subject property is located on Skyline Road S and all properties abutting the subject property are developed; thereby allowing for no alternative points of vehicle access to the property other than from Skyline Road. Because the only access to the subject property is from Skyline Road S – a minor arterial street, the proposal conforms to this neighborhood plan policy.

- **Housing Goal 47:** *To provide for a range of housing needs which will be compatible with existing housing stock.*

The proposed Multiple Family designation and corresponding RM-I zoning will allow for the property to be developed with medium density housing to help fulfill the City's overall housing need and accommodate a variety of dwelling types, densities, and price points to fulfill the needs of Salem's diverse population. As identified under the Comprehensive Plan, the Multiple Family designation is intended to promote medium and high-density housing distributed across the Salem area generally located not only near mixed-use employment areas, major transportation corridors, transit routes, parks, and schools but also near low-density residential areas. The proposed Multiple Family designation and RM-I zoning for the property will achieve this purpose and future development of the property will be required to conform to the applicable standards of the development code, including the multiple family design review standards of SRC Chapter 702, which help to ensure that the proposed development will be compatible with the existing single family and multiple family housing stock of the surrounding area. The proposal conforms to this neighborhood plan policy.

The proposed Multiple Family designation and corresponding RM-I zoning are also consistent with the following applicable Statewide Planning Goals as follows:

- **Statewide Planning Goal 1 – Citizen Involvement:** *To develop a citizen involvement program that ensures the opportunity for citizens to be involved in all phases of the planning process.*

In addition to the applicant attending a required neighborhood meeting, notice of the

proposal was also provided to the Sunnyslope Neighborhood Association, surrounding property owners and tenants within the notification area, and posted on the property prior to the hearing. The Planning Commission will hold a public hearing to consider the requested minor comprehensive plan map amendment, neighborhood plan map amendment, and zone change and a second subsequent public hearing will be held before the City Council to review the requested annexation and the Planning Commission's recommendation concerning the comprehensive plan and zoning designations proposed for the property. The required neighborhood meeting, public notice, and public hearing process ensure all interested parties are afforded the opportunity to review the application, comment on the proposal, and participate in the decision-making process. These procedures meet the requirements of this Goal for citizen involvement in the land use planning process. The proposal conforms to this statewide planning goal.

- **Statewide Planning Goal 2 – Land Use Planning:** *To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions.*

The City's comprehensive plan and implementing land use review procedures and development code are acknowledged to be in compliance with the Statewide Planning Goals and provide the policy framework for the basis of all land use decisions in the City. As identified by the facts and findings included in this report, the proposal is consistent with the applicable approval criteria and the applicant's proposal does not require that an exception be granted to any of the Statewide Planning Goals. The proposal therefore conforms to this statewide planning goal.

- **Statewide Planning Goal 3 – Agriculture Lands; Goal 4 – Forest Lands**

The subject property is located within the City's Urban Growth Boundary and the site is not designated as "agricultural lands," and does not include designated forest lands. These statewide planning goals are therefore not applicable to the proposal.

- **Statewide Planning Goal 5 – Open Spaces, Scenic and Historic Areas, and Natural Resources:** *To protect natural resources and conserve scenic and historic areas and open spaces.*

The subject property is not designated as an open space or scenic area; the property does not contain designated wildlife habitat; and according to the Salem-Keizer Local Wetland Inventory (LWI) there are no mapped wetland areas or waterways present on the site. The property is, however, located within the City's Historic and Cultural Resources Protection Zone concerning the potential for archaeological resources. In order to comply with Goal 5, any future development of the subject property is required to comply with the applicable provisions of SRC Chapter 230 (Historic Preservation). The proposal therefore conforms to this statewide planning goal.

- **Statewide Planning Goal 6– Air, Water, and Land Resources Quality:** *To maintain and improve the quality of the air, water and land resources of the state.*

At the time of future development of the property, specific site development plans will be submitted and review for conformance with local, state, and federal air, water, and land use resource standards. Required conformance with these applicable standards ensures the proposal will not have an impact on air, water, or land resources quality. The proposal conforms to this statewide planning goal.

- **Statewide Planning Goal 7 – Areas Subject to Natural Hazards:** *To protect people and property from natural hazards.*

According to the City's adopted landslide hazard susceptibility maps, there are no areas of mapped landslide hazard susceptibility present on the site and there are similarly no creeks or associated flood hazard areas on the property. The proposal conforms to this statewide planning goal.

- **Statewide Planning Goal 8 – Recreational Needs:** *To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.*

The subject property is not specifically identified under the City's Comprehensive Park System Master Plan as a potential park site; and the subject property is not located within an identified open space, natural area, or recreation area, and no destination resort is planned for the property. The proposal conforms to this statewide planning goal.

- **Statewide Planning Goal 9 – Economic Development:** *To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.*

The proposal is to change the Comprehensive Plan Map, and corresponding neighborhood plan map, designation of the property to Multi-Family Residential and its zoning to RM-I (Multiple Family Residential). The proposal does not, however, involve commercially or industrially designated land. This statewide planning goal is therefore not applicable to the proposal.

- **Statewide Planning Goal 10 – Housing:** *To provide for the housing needs of citizens of the state.*

As a result of the changes to the City's Comprehensive Plan, Comprehensive Plan Map, and zoning map that were adopted as part of the Our Salem project, the City has increased the amount of land available for housing to meet projected housing needs identified in the adopted Housing Needs Analysis (HNA). The proposed minor comprehensive plan map amendment to change the property's comprehensive plan map designation to Multiple Family Residential and zone change to change the zoning of the property to RM-I (Multiple Family Residential) will further increase the City's multi-family land supply and support the City's further compliance with the adopted Housing Needs Analysis and compliance with Statewide Planning Goal 10 by increasing the amount of land inventory within Salem's portion of the UGB that generally requires, and is intended to be developed for, multi-family housing. The

proposal therefore conforms to this statewide planning goal.

- ***Statewide Planning Goal 11 – Public Facilities and Services:*** *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.*

The City's Development Services Division reviewed the proposal and indicated that there are existing public water, sewer, and storm mains in Skyline Road S available to serve the property. The Water System Master Plan, however, identifies inadequate reservoir capacity in this area and the subject property is not currently served by a neighborhood park, as identified in the Comprehensive Parks System Master Plan. In order to ensure the property is adequately served by public facilities and services, future development will require an Urban Growth Area (UGA) Preliminary Declaration to address public facilities required to serve subject property under the standards and requirements of SRC Chapter 200 (Urban Growth Management). Compliance with the requirements of SRC Chapter 200 at the time of future development ensures that adequate public facilities and services are provided to serve the property. The proposal therefore complies with this statewide planning goal.

- ***Statewide Planning Goal 12 – Transportation:*** *To provide and encourage a safe, convenient and economic transportation system.*

Statewide Planning Goal 12 is implemented by the Transportation Planning Rule (TPR). In summary, the TPR requires local governments to adopt Transportation System Plans (TSPs) and requires local governments to consider transportation impacts resulting from land use decisions and development. The key provision of the TPR related to local land use decisions is Oregon Administrative Rule (OAR) 660-012-0060. This provision is triggered by amendments to comprehensive plans and land use regulations that "significantly affect" a surrounding transportation facility (road, intersection, etc.). Where there is a "significant effect" on a facility, the local government must ensure that any new allowed land uses are consistent with the capacity of the facility. In the context of a site-specific comprehensive plan map amendment and zone change, such as this proposal, a "significant effect" is defined under Oregon Administrative Rule (OAR) 660-012-0060(1) as either an amendment that "allows types or levels of land uses which would result in levels of travel or access which are inconsistent with the functional classification of a transportation facility," or an amendment that would "reduce the performance standards of an existing or planned facility below the minimum acceptable level identified in the TSP."

The applicant for a comprehensive plan map amendment is required to submit a Transportation Planning Rule (TPR) analysis identifying whether the request will have a "significant effect" on the surrounding transportation system, as defined above, or to propose mitigation measures to address impact.

The applicant submitted a TPR analysis (**Attachment H**) to address the requirements of OAR 660-012-0060. The TPR analysis demonstrates that the proposed comprehensive plan map amendment and zone change will not have a significant impact on the transportation system as defined by OAR 660-012-0060. The Assistant

City Traffic Engineer has reviewed the TPR Analysis and concurs with the TPR analysis findings. As there is no significant impact on the transportation system, no conditions of approval are recommended to address the transportation impacts of the proposal. At time of future development, the applicant will be required to provide improvements along the frontage of the property if required by SRC 803.040 (*Boundary Streets*). The proposal conforms to this statewide planning goal.

- **Statewide Planning Goal 13 – Energy Conservation:** *To conserve energy.*

Any future development of the property will be required to be built to comply with current energy standards. The proposal conforms to this statewide planning goal.

- **Statewide Planning Goal 14 – Urbanization:** *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.*

The subject property is located within the Urban Growth Boundary (UGB), and public facilities required to serve future development are located nearby. Existing transportation and utility infrastructure is available in the vicinity. The request allows for the efficient use and development of property without requiring extension of new public services. The proposed comprehensive plan map amendment, corresponding neighborhood plan map amendment, and zone change will allow the efficient use of urbanized land within the UGB in compliance with Goal 14. The proposal conforms to this statewide planning goal.

- **Statewide Planning Goal 15 – Willamette Greenway; Goal 16 – Estuarine Resources; Goal 17 – Coastal Shorelands; Goal 18 – Beaches and Dunes; and Goal 19 – Ocean Resources**

The subject property is not located within the Willamette River Greenway or an estuarine or coastal area. These statewide planning goals are therefore not applicable to the proposal.

SRC 64.025(e)(2)(E): *The amendment is in the public interest and would be of general benefit.*

Finding: The written statement provided by the applicant indicates that the proposed amendment to change the comprehensive plan designation from Developing Residential to Multiple Family Residential is in the public interest and would be of general benefit to the community. The amendment supports the City of Salem’s efforts to address housing needs by increasing the supply of land designated for multi-family residential use in an area that is already urbanizing and fully surrounded by city limits. This supports more efficient development patterns and promotes the use of existing public infrastructure.

By facilitating moderate-density residential development, the amendment contributes to a greater diversity of housing types and price points within the community, helping the City meet the objectives of Goal H 1 and Goal H 2 of the Salem Area Comprehensive Plan. It

also reduces pressure to expand the Urban Growth Boundary by making better use of land already within it, consistent with Goal G 3 – Growth Management.

The property's location along Skyline Road S, its proximity to existing city services, and its position within a developed urban enclave make it particularly well-suited for residential development. Directing growth to this location supports compact development, reduces vehicle miles traveled, and strengthens the City's ability to deliver cost-effective public services. Accordingly, the amendment serves the broader public interest by promoting efficient land use, housing availability, and responsible infrastructure planning.

Staff concurs with the findings included in the applicant's written statement. The proposed comprehensive plan map amendment, and corresponding neighborhood plan map amendment, to change the property's designation to "Multiple Family Residential" will help the City to further meet its multi-family housing needs identified in the adopted Housing Needs Analysis by providing additional land designated, and intended to be developed, for multi-family housing. Future development of the property will be required to conform to the applicable standards of the City's development code, including the multiple family design review standards of SRC Chapter 702, which ensure that development occurs in a manner that minimizes any potential impacts, and promotes compatibility, between the development and uses on adjacent land. This approval criterion is met.

8. Analysis of Quasi-Judicial Zone Change Approval Criteria

SRC Revised Code (SRC) 260.010(g)(2)(B)(ii) establishes the approval criteria for a zone change with an annexation. The following subsections are organized with approval criteria shown in ***bold italic***, followed by findings of fact evaluating the proposal's conformance with the criteria. Lack of compliance with the following criteria is grounds for denial of the Zone Change or for the issuance of conditions of approval to satisfy the criteria.

SRC 260.010(g)(2)(B)(ii): The proposed quasi-judicial zone change complies with the quasi-judicial zone change approval criteria of SRC 265.005(e), when the annexation includes a quasi-judicial zone change.

The quasi-judicial zone change approval criteria of SRC 265.005(e) are as follows:

SRC 265.005(e)(1)(A): The zone change is justified based on 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 zone would be compatible with the vicinity's development pattern.***
- (iii) A demonstration that the proposed zone change is equally or better suited for the property than the existing zone. A proposed zone is equally or better suited 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.***

Finding: The written statement provided by the applicant indicates that the proposed zone change from the City of Salem’s automatic post-annexation designation of RA (Residential Agriculture) to RM-I (Multiple Family Residential) is justified under SRC 265.005(e)(1)(A)(iii), which allows a zone change where the proposed zone is equally or better suited for the property than the existing zone. The RM-I zone is better suited for the subject property because the physical characteristics of the site—its location within the Urban Growth Boundary, direct frontage on Skyline Road S, proximity to existing public utilities, and its position as an enclave surrounded entirely by city limits—make it logical and appropriate for urban-scale residential development.

The RA zone is intended as a holding zone for recently annexed properties and is not reflective of long-term planned uses. In contrast, the RM-I zone allows for moderate-density multi-family residential development, which is more consistent with the City's housing needs, long-term growth policies, and the character of the surrounding area. Adjacent and nearby properties are developed or designated for urban residential uses, and the RM-I zone facilitates a logical extension of that pattern. The site’s suitability for extension of public services and infrastructure further supports its appropriateness for urban residential zoning. Accordingly, the RM-I zone is better suited for the property than the RA zone, both in terms of compatibility with surrounding development and in furthering the City’s adopted land use goals.

Staff concurs with the findings included in the applicant’s written statement. The proposed minor comprehensive plan map amendment to change the property’s comprehensive plan map designation to Multiple Family Residential and zone change to change the zoning of the property to RM-I will further increase the City’s multi-family land supply and support the City’s further compliance with the adopted Housing Needs Analysis (HNA) and compliance with Statewide Planning Goal 10 – Housing by increasing the amount of land inventory within Salem’s portion of the UGB that generally requires, and is intended to be developed for, multi-family housing.

By providing for additional multiple family zoned land, the proposed zone change responds to the changing social and demographic patterns within the City and the surrounding area that underly the multi-family housing needs identified in the adopted HNA. The proposed zone change to RM-I also provides for an equally or better suited zone for the property than the RA (Residential Agriculture) zone that would otherwise be applied to the property upon annexation if a comprehensive plan map amendment and zone change weren’t requested. This is because the proposed RM-I zoning allows for the logical expansion of the RM-I zone district boundary which applies to land immediately to the west; it provides for more efficient utilization of the land within the UGB based on its size and proximity to the other RM-I zoned land; and it represents a lower density multiple family zone that is more appropriate to the site, based on the size and configuration of the property and its proximity to abutting single family zoned land to the north, east, and south. This approval criterion is met.

SRC 265.005(e)(1)(B): If the zone change is City-initiated, and the change is for other than City-owned property, the zone change is in the public interest and would be of general benefit.

Finding: The proposal is not a City-initiated zone change. This criterion is therefore not applicable.

SRC 265.005(e)(1)(C): The zone change conforms with the applicable provisions of the Salem Area Comprehensive Plan.

Finding: The written statement provided by the applicant indicates that the proposed zone change from the City of Salem's automatic post-annexation zoning designation of RA (Residential Agriculture) to RM-I (Multiple Family Residential), in coordination with a comprehensive plan amendment from Developing Residential to Multiple Family Residential, complies with the applicable provisions of the Salem Area Comprehensive Plan (SACP). The RM-I zone is an implementing zone of the Multiple Family comprehensive plan designation and is intended to accommodate a variety of moderate-density multi-family housing types. The subject property is located within the Urban Growth Boundary and is entirely surrounded by land within city limits, making it an appropriate location for urban development.

The proposal is consistent with Goal H 1 – Housing, which seeks to ensure that the City provides a variety of housing opportunities to meet the needs of Salem's diverse population. By designating this site for RM-I zoning, the amendment supports the creation of multi-family housing options in a location that is readily serviceable and integrated into the existing urban fabric. The zone change also aligns with Goal H 2, which promotes infill development and redevelopment of underutilized land within the Urban Service Area.

Additionally, the amendment advances Goal G 3 – Growth Management, which encourages compact and efficient urban development patterns. The property's location within the Urban Growth Boundary and its adjacency to existing development ensure that the extension of services and infrastructure will be both practical and cost-effective. The proposal also supports Goal PF 2 – Public Facilities, by ensuring that new residential development occurs in areas where public services and infrastructure can be provided in a timely and efficient manner.

The requested zone change is consistent with the comprehensive plan's vision for accommodating growth in a way that supports the efficient use of land, infrastructure, and public resources. Therefore, the proposed zone change complies with the applicable provisions of the Salem Area Comprehensive Plan.

Staff concurs with the finding included in the applicant's written statement. The proposed zone change to RM-I conforms with the applicable provisions of the Salem Area Comprehensive Plan as identified by the applicant, and as identified by the findings addressing minor comprehensive plan map amendment criterion SRC 64.025(e)(2)(D) included above in this report. This approval criterion is therefore met.

SRC 265.005(e)(1)(D): The zone change complies with applicable Statewide Planning Goals and applicable administrative rules adopted by the Department of Land Conservation and Development.

Finding: The written statement provided by the applicant indicates that the proposed

zone change from the City of Salem's automatic post-annexation zoning designation of RA (Residential Agriculture) to RM-I (Multiple Family Residential), in conjunction with a comprehensive plan amendment from Developing Residential to Multiple Family Residential, complies with all applicable Statewide Planning Goals and administrative rules adopted by the Oregon Department of Land Conservation and Development (DLCD).

The subject property is located within the Salem Urban Growth Boundary (UGB) and is entirely surrounded by properties already within the City limits. The proposed change facilitates infill development in an urbanizing area consistent with Goal 14 (Urbanization), which encourages the efficient use of land and public services within UGBs.

The zone change also directly supports Goal 10 (Housing) by allowing for higher-density residential development that contributes to Salem's supply of land for needed housing types. The RM-I zone permits a variety of multi-family housing options and promotes housing affordability and diversity in a location already suited for urban development.

The proposal aligns with Goal 1 (Citizen Involvement) through adherence to the City's public hearing and notification process, and it is consistent with Goal 2 (Land Use Planning) by following an acknowledged local land use process supported by a factual record and policy framework. Additionally, the site can be served by existing or extendable public infrastructure, satisfying Goal 11 (Public Facilities and Services) and Goal 12 (Transportation) by ensuring that adequate services are available to support the proposed urban use.

No Goal exceptions are required because the land is within the UGB and the proposed zoning is consistent with Salem's acknowledged comprehensive plan. Therefore, the proposed zone change complies with all applicable statewide planning goals and DLCD administrative rules.

Staff concurs with the finding included in the applicant's written statement. The proposed zone change to RM-I conforms with the applicable provisions of the Statewide Planning Goals as identified by the findings addressing minor comprehensive plan map amendment criterion SRC 64.025(e)(2)(D) included above in this report. This approval criterion is therefore met.

SRC 265.005(e)(1)(E): If the zone change requires a comprehensive plan change from an industrial use designation to a non-industrial use designation, or from a commercial or employment designation to any other use designation, a demonstration that the proposed rezone is consistent with its most recent economic opportunities analysis and the parts of the Comprehensive Plan which address the provision of land for economic development and employment growth; or be accompanied by an amendment to the Comprehensive Plan to address the proposed rezone; or include both the demonstration and an amendment to the Comprehensive Plan.

Finding: The written statement provided by the applicant indicates that the applicant is requesting to change the default post-annexation designations applied by the City of

Salem from Developing Residential in the comprehensive plan and RA (Residential Agriculture) zoning to Multiple Family Residential in the comprehensive plan and RM-I (Multiple Family Residential) zoning. The change does not involve any property currently designated or proposed for industrial, commercial, or employment use.

Because the amendment does not result in the conversion of industrial or employment-designated land to residential or other non-employment uses, no analysis of the Economic Opportunities Analysis (EOA) or comprehensive plan policies related to employment land is required.

Staff concurs with the findings included in the applicant's written statement. The proposed zone change does not involve a change to commercially or industrially designated land. This approval criterion is therefore not applicable to the proposal.

SRC 265.005(e)(1)(F): The zone change does not significantly affect a transportation facility, or, if the zone change would significantly affect a transportation facility, the significant effects can be adequately addressed through the measures associated with, or conditions imposed on, the zone change.

Finding: The written statement provided by the applicant indicates that the applicant provided a Transportation Planning Rule Evaluation, which is required because the zone change is consolidated with the annexation petition. The findings conclude that the proposed future development will not significantly affect transportation facilities.

Staff concurs with the findings included in the applicant's written statement. The applicant submitted a TPR analysis (**Attachment H**) to address the requirements of OAR 660-012-0060. The TPR analysis demonstrates that the proposed comprehensive plan map amendment and zone change will not have a significant impact on the transportation system as defined by OAR 660-012-0060. The Assistant City Traffic Engineer has reviewed the TPR Analysis and concurs with the TPR analysis findings. As there is no significant impact on the transportation system, no conditions of approval are recommended to address the transportation impacts of the proposal. At time of future development, the applicant will be required to provide improvements along the frontage of the property if required by SRC 803.040 (*Boundary Streets*). This approval criterion is met.

SRC 265.005(e)(1)(G): The property is currently served, or is capable of being served, with public facilities and services necessary to support the uses allowed in the proposed zone.

Finding: The written statement provided by the applicant indicates that here are existing public facilities in Skyline Road S that are available to serve the subject site upon annexation. There is not a specific development being proposed with this application submittal, but initial analysis of the existing infrastructure shows it would be feasible for the existing infrastructure to be extended and upgraded if the existing capacity is insufficient for the future proposed development. This will be reviewed more closely in the future when the applicant submits for development approval.

Staff concurs with the findings included in the applicant's written statement. The City's Development Services Division reviewed the proposal and indicated that there are existing public water, sewer, and storm mains in Skyline Road S available to serve the property. The Water System Master Plan, however, identifies inadequate reservoir capacity in this area and the subject property is not currently served by a neighborhood park, as identified in the Comprehensive Parks System Master Plan. In order to ensure the property is adequately served by public facilities and services, future development will require an Urban Growth Area (UGA) Preliminary Declaration to address public facilities required to serve subject property under the standards and requirements of SRC Chapter 200 (Urban Growth Management). In addition, site-specific infrastructure requirements associated with the future development of the property will be further addressed at the time of Site Plan Review under SRC Chapter 220. This approval criterion is met.