

TO: PLANNING COMMISSION

**FROM: LISA ANDERSON-OGILVIE, AICP
DEPUTY COMMUNITY PLANNING AND DEVELOPMENT DIRECTOR AND
PLANNING ADMINISTRATOR**

**SUBJECT: MINOR COMPREHENSIVE PLAN MAP AMENDMENT / NEIGHBORHOOD
PLAN CHANGE / ZONE CHANGE CASE NO. CPC-NPC-ZC26-01; FOR
PROPERTY LOCATED AT 355 HAWTHORNE AVENUE SE (AMANDA
APPLICATION NO. 26-105541-PLN)**

REQUEST

A consolidated application for a Minor Comprehensive Plan Amendment and Neighborhood Plan Amendment from IND (Industrial) to IC (Industrial Commercial) and a Zone Change from IP (Industrial Park) to IC (Industrial Commercial) for property approximately 15.9 acres in size and located at 355 Hawthorne Avenue SE (Marion County Assessor's Map and Tax Lot Number: 073W25D / 1600).

APPLICANT: David Hughes, Salem-Keizer School District

OWNER: Salem-Keizer School District

REPRESENTATIVE: Mark Shipman, Margaret Gander Vo, Hannah Stevenson of Saalfeld Griggs Lawyers

RECOMMENDATION

Staff recommends that the Planning Commission adopt the facts and findings of the staff report and:

- A. **APPROVE** Minor Comprehensive Plan Map Amendment from "Industrial" to "Industrial Commercial";
- B. **APPROVE** Neighborhood Plan Map Amendment to Industrial Commercial; and
- C. **APPROVE** Zone Change from IP (Industrial Park) to IC (Industrial Commercial)

PROCEDURAL FINDINGS

1. Background

On March 6, 2026, Mark Shipman of Saalfeld Griggs Lawyers filed an application for a Comprehensive Plan Change, Neighborhood Plan Change, and Zone Change on behalf of the applicant and property owner, Salem-Keizer School District. The application was deemed complete for processing on April 3, 2026.

The applicant is requesting a Comprehensive Plan Map and Neighborhood Plan Amendment from IND (Industrial) to IC (Industrial Commercial) and to change the zoning from IP (Industrial Park) to IC (Industrial Commercial) for the subject property (**Attachment A**). The applicant's written statement along with all other submitted documents are available online as indicated below.

SUBSTANTIVE FINDINGS

2. 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, stormwater reports, and; 2) materials, testimony, and comments from public agencies, City Departments, neighborhood associations, and the public. All application materials are available on the City's online Permit Application Center at <https://permits.cityofsalem.net>. You may use the search function without registering and enter the permit number listed here: 26 105541.

3. Notice and Statutory Deadline

DLCD Notice: State law (ORS 197.610) and SRC 300.620(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 Comprehensive Plan Change and Zone Change application was provided to DLCD on April 6, 2026.

Applicant Open House: Pursuant to Table 300-2 in SRC 300.100, an application for a Comprehensive Plan Map Amendment requires an open house. However, per SRC 300.320(f), when an open house is required for a land use application, an applicant may elect to present at a regularly scheduled neighborhood association meeting in-lieu of arranging and attending an open house. The applicant's team attended a regularly scheduled meeting for the Southeast Salem Neighborhood Association (SESNA) on February 24, 2026. Documentation of the meeting is included in **Attachment B**.

Mailed Notice: Pursuant to SRC 300.620(b)(2), mailed notice was provided as required to any City-recognized neighborhood associations whose boundaries include, or are adjacent to, the subject property and to all property owners and tenants within 250 feet of the subject property.

Posted Notice: Pursuant to SRC 300.620(b)(3), notice was posted on the subject property by the applicant's representative.

Homeowners' Association: Pursuant to SRC 300.620(b)(2)(B)(vi) notice must be mailed to any active and duly incorporated Homeowners' Association (HOA) applicable to the property. The subject property is not located within a Homeowners' Association.

120-Day Rule: Pursuant to Oregon Revised Statutes (ORS) 227.128, amendments to an acknowledged Comprehensive Plan and Quasi-Judicial Zone Changes when filed concurrently

are not subject to the 120-day rule.

4. Neighborhood Association and Public Comments

The subject property is located within the boundaries of the Southeast Salem Neighborhood Association (SESNA) and is also adjacent to the North East Salem Community Association (NESCA). While the subject property is not abutting the Northeast Neighbors (NEN) neighborhood association, the Neighborhood Plan that is being amended as part of the proposal is a joint Neighborhood Plan with NEN and SESNA.

Neighborhood Association Comment: As of the date of completion of this staff report, a letter in support of the proposal (**Attachment D**) was provided by the Southeast Salem Neighborhood Association (SESNA).

Public Comment: As of the date of completion of this staff report, no comments were received from the public.

5. City Department Comments

Development Services Division - Reviewed the proposal and provided findings which are included in this report.

Building and Safety Division - Reviewed the proposal and indicated that Building Permits will be required for future development as applicable.

Fire Department - Reviewed the proposal and indicated no concerns.

6. Existing Conditions

❖ COMPREHENSIVE PLAN

The Salem Area Comprehensive Plan (SACP) is a long-range plan for guiding development in the Salem urban area. The overall goal of the plan is to accommodate development in a timely, orderly, and efficient arrangement of land uses and public facilities and services that meets the needs of present and future residents of the Salem urban area. Many different documents and maps, when taken together, comprise the Salem Area Comprehensive Plan.

The subject property is located at 355 Hawthorne Avenue SE (Marion County Assessor’s Map and Tax Lot Number: 073W25D / 1600), approximately 15.9 acres in size, and is designated as IND (Industrial) on the SACP Map. The proposal includes changing the SACP designation of the subject property to IC (Industrial Commercial). The Comprehensive Plan designations of surrounding properties are in the table below:

Comprehensive Plan Map Designations of Surrounding Properties	
North	IC (Industrial Commercial); Across State Street – CSG (Community Service Government)
South	Across Kettle Court SE – IC (Industrial Commercial)

East	Across Hawthorne Avenue SE – IND (Industrial) and IC (Industrial Commercial)
West	Across Kettle Courte SE – IND (Industrial)

❖ **ZONING AND LAND USE**

The subject property is zoned IP (Industrial Park) and is currently developed with multiple surface off-street parking areas and an approximately 77,869 square-foot building. The building was most recently used as a Call Center for Wells Fargo, which is classified as an *Office* use per SRC 400.050(a). The specific *Office* use as a Call Center is permitted in the IP zone per Table 553-1 in SRC 553.005(a), and all *Office* uses are permitted in the IC (Industrial Commercial) zone per Table 551-1 in SRC 551.005(a). The proposal includes changing the zoning of the subject property from IP to IC to allow a greater variety of *Education Services* uses, as only *Child Daycare Services* and *Vocational Trade Schools* are permitted in the IP zone, while all *Educational Services* uses are permitted in the IC zone.

The current zoning designations and land uses for the surrounding properties are in the tables below:

Zoning of Surrounding Properties	
North	IC (Industrial Commercial); Across State Street – PH (Public and Private Health Services)
South	Across Kettle Court SE – IC (Industrial Commercial)
East	Across Hawthorne Avenue SE – IBC (Industrial Business Campus), IC (Industrial Commercial), and IP (Industrial Park)
West	Across Kettle Courte SE – IP (Industrial Park)

Land Use of Surrounding Properties	
North	<i>Office Complex</i> (corporate offices), <i>Outpatient Medical Services and Laboratories</i> (Salem Health); Across State Street – <i>Emergency Services</i> (Oregon Military Department Anderson Readiness Center)
South	Across Kettle Court SE – <i>Office</i> (Northwest Farm Credit Services)
East	Across Hawthorne Avenue SE – <i>Shopping Complex</i> (various tenants)
West	Across Kettle Courte SE – <i>General Manufacturing</i> (Kettle Foods Inc.)

❖ **LAND USE HISTORY**

REP06-07: A Replat to reconfigure a portion of Lots 20, 22, 23, 24, 25, 26, 27, 28, 29, and 30 of Melrose Addition and adjacent land in an IP (Industrial Park) zone.

❖ **INFRASTRUCTURE**

- ***Streets and Right-of-Way***

Salem Transportation System Plan (TSP)

The Salem TSP uses a Street Classification System to determine the functional classification of each street within the City’s street system. State Street abuts the subject property to the north and is designated as a major arterial street; Kettle Court SE abuts the subject property to the south and west and is designated as a private street; Hawthorne Avenue SE abuts the subject property to the east and is designated as a major arterial street.

The existing conditions of streets abutting the subject property are described in the table below:

Streets			
Street Name		Right-of-Way Width	Improvement Width
Hawthorne Ave NE (Major Arterial)	Standard:	96-feet	68-feet
	Existing Condition:	100-feet	68-feet
Kettle Court SE (Local, Private)	Standard:	N/A - Private	30-feet
	Existing Condition:	N/A - Private	40-feet
State Street (Major Arterial)	Standard:	96-feet	68-feet
	Existing Condition:	128-feet	72-feet

Transportation Planning Rule

The applicant submitted a Transportation Planning Rule (TPR) Analysis (**Attachment C**) in consideration of the requirements of the TPR (OAR 660-012-0060). The TPR analysis is required to demonstrate that the proposed Comprehensive Plan Change / Zone Change will not have a significant effect on the transportation system as defined by OAR 660-012-0060.

- **Utilities**

Urban Growth Management

SRC Chapter 200 (Urban Growth Management) requires issuance of an Urban Growth Preliminary Declaration (UGA) prior to development of property located outside the City’s Urban Service Area. The subject property is located outside of the Urban Service Area. If the applicant proposes to develop the property as defined in SRC 200.005, an Urban Growth Area (UGA) Development Permit would be required at the time of development (SRC 200.010(c)). A UGA development permit requires an applicant to provide linking and boundary facilities to their property under the standards and requirements of SRC Chapter 200.

Public Infrastructure Plan

The *Water System Master Plan, Wastewater Management Master Plan, Stormwater Master Plan, Comprehensive Parks System Master Plan,* and the *Transportation System Plan* provide the outline for facilities adequate to serve the proposed zone.

The existing conditions of public infrastructure available to serve the subject property are described in the following table:

Utilities & Parks	
Type	Existing Conditions

Water	Water Service Level: G-0
	16-inch water mains are located in Hawthorne Avenue NE and State Street.
	A 12-inch water main is located in Kettle Court SE and extends onto the subject property in an easement.
Sanitary Sewer	A 12-inch sanitary sewer main is located in Hawthorne Avenue NE.
	A 10-inch sanitary sewer main is located in Kettle Court SE.
	A 15-inch sewer main is located in State Street.
Storm Drainage	A 36-inch storm main is located in Hawthorne Avenue NE.
	A 10-inch storm main is located in State Street.
Parks	The proposed development is served by Geer Park located one-quarter mile north of the subject property.

❖ **ENVIRONMENTAL FACTORS**

▪ ***SRC Chapter 601 – Floodplain***

Development in the floodplain shall be regulated to preserve and maintain the capability to the floodplain to convey the flood water discharges and to minimize danger to life and property.

Finding: The subject property is designated on the Federal Emergency Management Agency floodplain maps as a Zone “AE” floodplain. Development within the floodplain requires a floodplain development permit and is subject to the requirements of SRC Chapter 601. At time of future development on the property, a Floodplain Development Permit will be required in accordance with the applicable standards of SRC Chapter 601.

▪ ***SRC Chapter 808 – Preservation of Trees and Vegetation***

The City’s tree preservation ordinance protects Heritage Trees, significant trees (including Oregon White Oaks with diameter-at-breast-height (dbh) of 20 inches or greater and most other trees with a dbh of 30 inches or greater), trees and native vegetation in Riparian Corridors, and trees on lots and parcels greater than 20,000 square feet.

Finding: There are no mapped waterways on the subject property that would result in a Riparian Corridor being present. There is a cluster of trees in the northeast part of the property and some abutting Kettle Court SE in the southwest part of the property, though no trees appear to be significant. Any significant trees or vegetation on the property are protected pursuant to SRC Chapter 808.

▪ ***SRC Chapter 809 – Wetlands***

Grading and construction activities within wetlands are regulated by the Oregon Department of State Lands (DSL) and US Army Corps of Engineers. State and Federal wetlands laws are also administered by the DSL and Army Corps, and potential impacts to jurisdictional wetlands are addressed through application and enforcement of appropriate mitigation measures. SRC Chapter 809 establishes requirements for notification of DSL when an application for

development is received in an area designated as a wetland on the official wetlands map.

Finding: The Salem-Keizer Local Wetland Inventory shows that there are wetland channels and/or hydric soils mapped on the property. The applicant should contact the Oregon Department of State Lands to verify if any permits are required for development or construction in the vicinity of the mapped wetland area(s), including any work in the public right-of-way.

▪ ***SRC Chapter 810 – Landslide Hazards***

The City’s landslide hazard ordinance (SRC Chapter 810) establishes standards and requirements for the development of land within areas of identified landslide hazard susceptibility.

Finding: According to the City’s adopted landslide hazard susceptibility maps and SRC Chapter 810 (Landslide Hazards), there are no mapped landslide hazard areas on the subject property.

7. Analysis of Minor Comprehensive Plan Map Amendment Approval Criteria

Per SRC 64.025(a)(2), a Minor Plan Map Amendment is an amendment to either the Comprehensive Plan Map or a general land use map in a Neighborhood Plan, where the amendment affects only a small number of properties or a closely circumscribed set of factual circumstances. SRC 64.025(e)(2) establishes the approval criteria for a Minor Plan Map Amendment, where the greater the impact of the proposed Minor Plan Map Amendment, the greater the burden on an applicant to demonstrate that the criteria are satisfied.

The following subsections are organized with approval criteria shown in ***bold italic***, followed by findings evaluating the proposal’s conformance with the criteria. Lack of compliance with the following criteria is grounds for denial of the Minor Comprehensive Plan Map Amendment.

SRC 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 applicant submitted findings meeting SRC 64.025(e)(2)(A)(ii), wherein the proposed change to IC (Industrial Commercial) is equally or better suited for the subject property than the existing designation of IND (Industrial). The proposed change to Industrial Commercial is supported by similar Comprehensive Plan Map updates in the vicinity of the subject property, as well as the proposed use of the property.

Within a quarter mile of the subject property, there have been five Minor Comprehensive Plan Map Amendments since 2005 to change the Comprehensive Plan designation of property from IND (Industrial) to IC (Industrial Commercial), as well as the redesignation of the three abutting properties to the north from IND to IC with the implementation of the 2022 Salem Area Comprehensive Plan (Our Salem). Furthermore, the change to Industrial Commercial will provide a wider range of industrial uses to support the Industrial Land Goal of Our Salem, while also supporting the need for commercial land within the City.

These previous approvals demonstrate that the immediate area has shifted towards light industrial and commercial uses rather than heavy industrial uses, fostering development such as hotels, office and shopping complexes, and light manufacturing. These changes have allowed the area to develop into a commercial business park while still maintaining light manufacturing and industrial uses. In the vicinity of the subject property, there are currently a variety of commercial uses such as hotels, offices, and banks, as well as industrial services and manufacturing.

The intent of the Industrial Commercial comprehensive plan designation is to provide areas that can accommodate a mixture of heavy commercial, light industrial/manufacturing, and warehousing activities. The proposed change is equally or better suited for the property by allowing a wider range of uses for the existing industrial property, while also becoming more consistent with the existing commercial and light industrial uses in the vicinity, which further supports the proposed *Education Services* use. Therefore, the proposal meets this criterion.

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 subject property is located outside of the City's Urban Service Area, though the public facilities available in the surrounding area (water, sewer, and stormwater infrastructure) appear to be adequate to serve uses allowed by the proposed Comprehensive Plan Map designation. Any future development will be reviewed for site-specific infrastructure requirements through the Site Plan Review process pursuant to SRC Chapter 220 and other development processes within the Unified Development Code (UDC) as applicable. Therefore,

as adequate facilities are available and will be reviewed for compatibility at the time of development review, this criterion is met.

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

Finding: As the Comprehensive Plan designations for multiple nearby properties have already changed from Industrial to Industrial Commercial in the last 20 years, and the current mix of land uses is more consistent with heavy commercial uses rather than traditional industrial uses, the redesignation to Industrial Commercial provides for the most logical urbanization of land in line with previous approvals on adjacent properties, meeting the criterion.

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: The applicable Goals and Policies of the Salem Area Comprehensive Plan and Statewide Planning Goals are addressed as follows:

❖ **APPLICABLE SALEM AREA COMPREHENSIVE PLAN GOALS**

Economic Development Goals and Policies (Page 56, 2022 SACP)

- ***Goal 1 – Strengthen and diversify the economy to enhance Salem’s economic prosperity and resiliency***

E1.1 – Diversity.

A diverse range of businesses and industries should be encouraged in the Salem Urban Area to provide jobs and services to the diverse, growing population and to strengthen economic resiliency.

Finding: The subject property is currently developed with 77,869 square-foot building previously used as a call center (*Office* use) for Wells Fargo and has been vacant since December 2024. The applicant (Salem-Keizer School District) purchased the property in December 2025, and if approved, the request to designate the property as Industrial Commercial would allow the school district to establish a wider variety of *Education Services* uses that are not currently permitted in the IP zone or the Industrial Comprehensive Plan designation. The Industrial Commercial zone and Comprehensive Plan designation allow for a wider range of commercial, light industrial, and public uses, permitting a more diverse range of businesses and industries in the surrounding urban area in line with the goals of the Salem Area Comprehensive Plan.

E1.8 – Campus Institutions.

The stability and growth of major campus institutions should be supported as essential service providers, workforce development resources, and major employers.

Finding: The proposed change to Industrial Commercial will allow major employers such as the applicant—the Salem-Keizer School District—to better support existing education

institutions, as well as redevelop for additional *Education Services* uses on the property.

E1.10 – Regional Center.

The Salem Urban Area shall be retained, developed, and promoted as a commercial, cultural, and economic center for the Mid-Willamette Valley region.

Finding: With the proposed change from Industrial to Industrial Commercial, a wider variety of commercial uses will be permitted on the subject property, encouraging more uses that will allow the Salem Urban Area to grow into a greater economic center in the Mid-Willamette Valley.

E1.13 – Flexibility.

The types and arrangements of businesses allowed in employment areas should be flexible to support adaptive reuse of existing buildings in changing economies.

Finding: Under the Industrial designation and IP zone, the existing building is limited in the types of *Office* uses allowed, as well as limiting the types of *Education Services* and *Retail Sales* uses. With the redesignation and rezoning to Industrial Commercial, the subject property and existing building can be utilized for all *Retail Sales and Service, Business and Professional Services, and Education Services* uses—as they would be permitted outright rather than restricted—while also still permitting industrial uses on the property.

- **Goal 2 – Maintain an adequate supply of land to meet Salem’s economic and employment needs**

E2.1 – Employment Land.

The City shall provide a supply of employment land that accommodates the amounts, size, types, locations, and service levels needed to meet the short-term and long-term employment growth forecasts for the Salem Urban Area.

Finding: Amending the Comprehensive Plan Map to designate the subject property as Industrial Commercial would maintain the overall acreage available within the Urban Growth Boundary for industrial uses, while allowing the parcel to be developed with a wider range of uses consistent with the industrial and commercial development pattern in the vicinity.

E2.4 – Infill and Redevelopment.

Industrial development should be encouraged in infill and redevelopment locations that are currently served or adjacent to developed properties to maximize returns on public infrastructure investments.

Finding: The subject property is currently served by existing infrastructure, and with the change to Industrial Commercial, will allow a wider variety of compatible uses to utilize the existing building. The subject property also contains several undeveloped areas which could be redeveloped into new structures, as well as the redevelopment of existing surface parking. Furthermore, as the property abuts two major arterial streets (Hawthorne Avenue SE and State Street) development of this site will maximize existing public infrastructure in compliance with this policy.

E2.8 – Industrial Land Inventory

The City shall maintain a long-term supply of industrial land and seek to preserve key high value industrial land, especially areas where the City has made substantial investments in infrastructure. High value industrial land has the following characteristics: it is designated for industrial uses, in flat parcels, most frequently in large parcels at least 10 acres in size, located within an industrial district, has direct access to a state highway or I-5, and is serviced or planned to be serviced with water and wastewater infrastructure.

Finding: As the subject property is relatively flat, more than ten acres in size, is served by existing water and wastewater infrastructure, and is less than a mile from an access point for Interstate 5, it is considered high value industrial land. As the proposed change from Industrial to Industrial Commercial will not prohibit industrial uses and will otherwise not affect the characteristics that make the subject property high value industrial land, the proposed change in Comprehensive Plan Map designation meets the policy.

E2.9 – Industrial Land Conversion

Industrial land that may be appropriate for conversions to commercial or other non-industrial uses should include some or all of the following:

- 1) Located outside of industrial areas or isolated from other industrial uses;
- 2) Surrounded by incompatible uses (such as housing);
- 3) Located adjacent to properties that have converted to commercial uses;
- 4) Have limited or no access to major roads (such as arterial streets, collector streets, or highways); or
- 5) Lack of rail access.

Finding: While the proposed change from Industrial to Industrial Commercial would permit additional commercial uses on the subject property, the complete conversion to commercial or other non-industrial uses would not fully align with development patterns in the vicinity. The subject property is abutting industrial uses to the west while also abutting commercial uses to the north and south. Therefore, while the subject property could be considered outside of an industrial area, it is not considered to be isolated from other industrial uses.

Furthermore, changing the designation to Industrial Commercial would make the surrounding uses more compatible with the subject property, as the existing *Office, Retail Sales, and Outpatient Medical Services and Laboratories* uses—as well as the additional *Education Services* uses desired by the applicant—are currently not permitted in the Industrial Comprehensive Plan designation or IP (Industrial Park) zone. However, by retaining status as Industrial Commercial rather than a non-industrial designation, the subject property also maintains compatibility with the adjacent *Manufacturing and Wholesale Sales, Storage, and Distribution* uses. Therefore, even though some adjacent properties have converted to commercial uses, other properties in the vicinity have maintained industrial uses, which supports the change to a transitional zone and Comprehensive Plan designation such as Industrial Commercial to permit the coexistence of both use categories.

Regarding transportation access, the subject property abuts two major arterial streets (Hawthorne Avenue SE and State Street); however, vehicular access is provided by the existing private local street (Kettle Court SE), with direct access onto these major arterial streets requiring additional land use approval. There is also no direct or nearby rail access,

which further limits the viability of the subject property for heavy industrial uses. Therefore, the existing and possible transportation access for the subject property is more conducive to light industrial and commercial uses than heavy industrial uses, further justifying the redesignation of the property as Industrial Commercial rather than Industrial.

Land Use and Urbanization Goals and Policies (Page 64, 2022 SACP)

- ***Goal 1 – 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***

L1.10 – Infill.

Development of vacant and underutilized land with existing urban services should be encouraged before converting urbanizable lands to urban uses and extending services beyond presently served areas.

Finding: The subject property is currently developed with a vacant building previously used as a call center (*Office* use), along with a large off-street parking area. Amending the Comprehensive Plan Map for the subject property to Industrial Commercial would increase the likelihood that the existing services and infrastructure on the subject property could be utilized for permitted and compatible uses, rather than requiring further development of vacant land.

Transportation Goals (Page 90, 2022 SACP)

- ***Goal 9 – Design and manage on- and off-street parking to ensure an appropriate supply of parking facilities for all modes, while protecting Salem’s neighborhoods and environment***

Finding: The subject property is currently developed with a sizable surface off-street parking area, with vehicle access provided from Kettle Court SE. Pedestrian access is also provided from the existing building to the adjacent streets through existing pedestrian pathways, and a minimum amount of bicycle parking required depending on the proposed use per SRC Chapter 806. The proposed change to Industrial Commercial would not negatively affect the supply of parking facilities for the subject property, and with lighter industrial and commercial uses being permitted, the surrounding environment will be more approachable for non-motorized users and permitted uses will be less impactful to adjacent neighborhoods.

- ***Goal 10 – Maximize the efficiency of the existing surface transportation system through management techniques and facility improvements***

Finding: The subject property has existing driveways onto Kettle Court SE (a private street), which provides direct access to State Street and Hawthorne Avenue SE, both of which are classified as major arterial streets in the Salem Transportation System Plan (TSP). As discussed in findings provided by the Development Services Division and within the applicant’s provided Transportation Plan Rule (TPR) Analysis (**Attachment C**), the existing facilities are already adequate for any additional uses that may result from the Comprehensive Plan and

Zone Change.

Per the applicant's TPR Analysis, the proposed change to Industrial Commercial will not result in an impact to the transportation system and does not require mitigation improvements. As the existing system is sufficient for the proposed Comprehensive Plan Map Amendment and Zone Change and additional mitigation measures are not required, the proposal maximizes the efficiency of the existing transportation systems.

Public Facilities and Infrastructure Goals and Policies (Page 94, 2022 SACP)

- ***Goal 1 – Provide accessible, high-quality public facilities and services to meet the needs of current and future generations and to promote quality of life***

PF1.1 – Schools.

The City shall collaborate with the Salem-Keizer School District to help align school services with changes and growth in population, including coordinating in the development of school facility plans and seeking input in long-range planning projects.

Finding: The change to Comprehensive Plan Map designation and zone of Industrial Commercial will allow the property owner—the Salem-Keizer School District—as well as any future property owners or tenants to provide additional service and facilities related to education, as the *Education Services* currently permitted in the IP (Industrial Park) zone and IND (Industrial) Comprehensive Plan Map designation are far more limited.

When designated as Industrial and zoned IP (Industrial Park), as the focus of the area is for heavy industrial uses that have a greater impact on the surrounding community, the permitted *Education Services* uses are limited to child day care services and vocational trade schools. However, with a change to Industrial Commercial, all *Education Services* listed within SRC 400.070 are permitted, which would allow the school district greater flexibility in providing needed services now and in the future.

❖ APPLICABLE STATEWIDE PLANNING GOALS

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.

Finding: Prior, during, and anticipated after the issuance of a decision, this consolidated application has ensured that citizens have ample opportunities to provide input regarding the land use planning process for the subject property. As the subject property is located within the Southeast Salem Neighborhood Association (SESNA), the applicant's representative attended a regularly scheduled meeting with them on February 26, 2026, in lieu of an Open House per SRC 300.320(f). As a Type III Land Use Application, public notice was also provided pursuant to SRC 300.620(b) to the neighborhood associations whose boundaries include, or are adjacent to, the subject property (SESNA and NESCA) as well as all addresses within 250 feet of the subject property. Notice of the public hearing was also provided on all street frontages of the subject property with posted signs pursuant to SRC 300.620(b)(3).

Attending the neighborhood association meeting—as well as the mailed and posted public notice leading up to the public hearing with the Planning Commission—provided all interested parties the opportunity to review the application and participate in the public land use process, meeting the requirements of Goal 1.

Goal 2 – Land Use Planning

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

Finding: The Salem Revised Code (SRC) as well as the adopted Salem Area Comprehensive Plan (SACP) have established a robust framework for land use planning for the City of Salem in compliance with this goal, which is further supported by the Oregon Department of Land Conservation and Development’s (DLCD) acknowledgement that the SACP complies with the Statewide Planning Goals. As the proposed Comprehensive Plan Amendment and Zone Change are in compliance with the applicable approval criteria and standards within the SRC, the land use planning process has been followed in compliance with this goal.

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

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

Finding: The subject property and surrounding area are already mostly developed, with no historic districts or buildings located on or adjacent to the property. Per the Salem-Keizer Local Wetland Inventory, wetlands and/or hydric soils are present on the subject property, which requires notification of the Oregon Department of State Lands (DSL) prior to any construction to determine if additional permits are required. The City of Salem also utilizes an Archaeological Compliance Program to ensure archaeological sites are protected from disturbance. As the subject property is within the Historic and Cultural Resources Protection Zone, verification with the City Archaeologist is required prior to any ground-disturbing activity on the subject property to protect archaeological resources.

As the proposed Comprehensive Plan Amendment and Zone Change will not require any additional ground-disturbing development, and future construction on undeveloped portions of the property will require clearance from DSL and the City Archaeologist to protect the existing natural and historic resources, the proposal complies with Goal 5.

Goal 6 – Air, Water, and Land Resources Quality

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

Finding: The subject property is located within an urban area of the City of Salem, which anticipates impacts to the local environment such as air, water, and land resources. Standards within the Unified Development Code (UDC) and Salem Revised Code (SRC) provide protections for these natural resources, such as the SRC Chapter 600 protecting the Willamette Greenway and SRC Chapter 808 protecting significant trees and vegetation. Additional standards related to stormwater and wastewater are also required to be met with new development, as well as approval from the Oregon Department of Environmental Quality (DEQ). Therefore, as new development will be required to meet the standards of the UDC and SRC that provide protection to these natural resources, and the Industrial Commercial

designation encourages less impactful uses such as commercial rather than heavy industrial, this meets Goal 6.

Goal 7 – Areas Subject to Natural Hazards

To protect people and property from natural hazards.

Finding: The subject property is designated on the Federal Emergency Management Agency’s floodplain maps as a Zone AE floodplain, though there are no mapped landslide or other natural hazards present. Any new development on the subject property within the floodplain will require approval of a Floodplain Development Permit subject to SRC Chapter 601 to ensure new structures are more resilient to flooding. As the SRC requires any new development within mapped hazard areas to obtain specific approval, and the proposal by the applicant does not include any new structures or modifications to existing structures, the proposal is consistent with Goal 7.

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.

Finding: Prior to the Comprehensive Plan update in 2022, the City of Salem in 2014 conducted a study to examine Salem’s needs for industrial and commercial land through 2035. This study—the Salem Economic Opportunities Analysis (EOA)—was adopted by City Council in 2015 and concluded that Salem is projected to have a shortage of commercial land by 2035. The EOA provided strategies for how to meet the projected employment needs of the area even with a lack of commercial land, though one solution to the shortage of commercial land is to rezone to zones that permit additional commercial uses.

Therefore, in line with the Salem EOA, the proposal to redesignate the Comprehensive Plan and zone of the subject property as Industrial Commercial will increase the amount of land available for commercial uses, with the additional permitted uses in the IC zone providing additional opportunities for economic development to accomplish Goal 9.

Goal 10 – Housing

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

Finding: Alongside the EOA, the City of Salem also conducted a Housing Needs Analysis (HNA) in 2014 to determine what the City’s housing needs would be by 2035 and the policy decisions necessary to address any shortfalls. The HNA concluded that by 2035, there would be a surplus of approximately 1,975 acres of land zoned for detached, *Single-Family* homes; however, there would also be a deficit of approximately 207 acres of land zoned for *Multifamily* dwellings. With the adoption of the Our Salem Comprehensive Plan update in 2022, the allowed uses for some zones were modified to permit additional residential types, including *Multifamily*. The current designation as Industrial and zone of IP (Industrial Park) does not permit Middle-Housing or *Multifamily* uses; however, with a change to Industrial Commercial and IC zoning, more types of residential uses are permitted, including *Multifamily* when located in a mixed-use building. Therefore, the proposed Comprehensive Plan Map Amendment and Zone Change will increase the City’s supply of land for housing in compliance with Goal 10.

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.

Finding: The subject property is located outside of the City’s Urban Service Area, though the public facilities available in the surrounding area (water, sewer, and stormwater infrastructure) appear to be adequate to serve uses allowed by the proposed Comprehensive Plan Map designation. Any future development will be reviewed for site-specific infrastructure requirements through the Site Plan Review process pursuant to SRC Chapter 220 and other development processes within the Unified Development Code (UDC) as applicable. Therefore, as adequate facilities are available and will be reviewed for compatibility at the time of development review, Goal 11 is met.

Goal 12 – Transportation

To provide and encourage a safe, convenient and economic transportation system.

Finding: Transportation and related land use decisions are guided by Oregon Administrative Rule (OAR) 660-012-0060, which requires adherence to the Transportation Planning Rule (TPR) and for local governments to adopt Transportation System Plans (TSPs) to analyze transportation impacts resulting from land use decisions and development.

Amendments to the Comprehensive Plan and Zone Changes require the application of OAR 660-012-0060 to determine if surrounding transportation facilities (roads, intersections, etc.) are “significantly affected.” Per OAR 660-012-0060(1), a facility can generally be considered “significantly affected” with a site-specific Comprehensive Plan Map Amendment such as the proposal when 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.”

As the local government must ensure that any change in allowed uses are consistent with the capacity of the related facility and will not “significantly affect” surrounding facilities, as part of the Comprehensive Plan Map Amendment, the applicant was required to submit a Transportation Planning Rule (TPR) analysis (**Attachment C**). 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 and as such, no mitigation is required. As the Assistant City Traffic Engineer concurs with the TPR analysis and findings, the proposal aligns with Goal 12.

Goal 13 – Energy Conservation

To conserve energy, land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles.

Finding: The applicant indicates that the proposal will allow the existing building to be used for a wider variety of uses and would prevent the construction of similar buildings for the same

purpose, thereby making use of underutilized land consistent with Goal 13.

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.

Finding: The subject property is located within city limits and the Urban Growth Boundary (UGB), with public facilities such as transportation and utility infrastructure available nearby to serve the current and any future development. The Comprehensive Plan Map Amendment and related Zone Change will permit additional uses that traditionally require less land area and can be built more densely, such as *Office or Education Service* uses. It will also allow for the existing building to be repurposed for a greater variety of uses, promoting the efficient use and development of the property without requiring an extension of public services. Therefore, the proposal supports the efficient use of land in compliance with Goal 14.

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

Finding: The proposal will permit a wider variety of uses on the property, allowing for additional flexibility for future use and development of the property, including the utilization of the existing building and surrounding infrastructure. The proposal will also permit the applicant—the Salem-Keizer School District—to use the existing building for *Education Services* uses, which are severely limited with the current Comprehensive Plan Map designation and zone. Therefore, as the proposed Amendment will allow for greater flexibility of the subject property and will permit the expansion of a public service (*Education Services* provided by the school district), it is in the public interest and would be of general benefit, meeting the criterion.

8. Analysis of Neighborhood Plan Change

Per SRC 64.300(a), a Neighborhood Plan is a written plan embodying citizen desires on a broad range of concerns in a designated neighborhood. The purpose of a Neighborhood Plan is to provide detailed goals and policies for the designated neighborhood in a manner consistent with the Salem Area Comprehensive Plan.

Pursuant to SRC 64.310(a), only the goals and policy statements in a Neighborhood Plan and generalized land use map shall be considered for adoption as part of the Salem Area Comprehensive Plan. The goals and policies that are adopted shall be consistent with the Salem Area Comprehensive Plan and the Statewide planning goals. Recommendations that are not consistent with the Salem Area Comprehensive Plan shall not be adopted as components of the Salem Area Comprehensive Plan but may be adopted as support documents and may be considered in making land use decisions affecting the designated neighborhood.

Finding: The subject property is located within the boundaries of the Southeast Salem Neighborhood Association (SESNA), which shares a Neighborhood Plan with the Northeast Neighbors (NEN) neighborhood association. The NEN-SESNA Neighborhood Plan was adopted by Ordinance No. 23-14 and enacted on March 25, 2015, and contains the following

Goals and Policies applicable to the proposed Minor Comprehensive Plan Map Amendment from IND (Industrial) to IC (Industrial Commercial):

▪ **Goal 5 – Mixed-Use Development**

Promote mixed-use development that encourages walking and bicycling, supports economic and social vitality, provides services to nearby residential neighborhoods, reduces reliance on automobile trips, encourages the efficient use of land and reduces the need for parking.

Policy 5.1 – The City shall facilitate mixed-use development that promotes walkability and reduces the need for single-occupancy vehicle trips and off-street parking.

Finding: While the applicant has not indicated the development of housing or mixed-use development as part of the proposal, the change to Industrial Commercial and IC zoning permits residential uses when located in a mixed-use building, which would permit future development of mixed-use buildings on the subject property.

▪ **Goal 6 – Industrial Development**

Support and promote industrial development that strengthens the community’s economic base, increases employment opportunities, and minimizes negative impacts on adjacent neighborhoods and the environment.

Policy 6.1 – New industrial development adjacent to residential uses shall incorporate landscaping and screening to reduce negative visual impacts.

Finding: The applicant has indicated that industrial development is not proposed, though a minimum 30-foot setback with Type C landscaping is required for buildings, accessory structures, and vehicle use areas for all uses in the IC zone when abutting a residentially zoned property. Per SRC 807.015, Type C landscaping requires a minimum of one Plant Unit per 20 square feet of landscaped area, along with a six-foot-tall fence or wall. However, as there are no residential zones adjacent to the subject property, this goal is not applicable to the proposal.

Policy 6.2 – The industrial base in NEN and SESNA should be diversified through the expansion of existing industries and the growth of new, clean industries.

Finding: The proposal would allow for lighter industrial and commercial uses while prohibiting heavier industrial uses, permitting a wider variety of uses overall and encouraging denser and less impactful development. Therefore, this goal is met.

Policy 6.3 – The City should establish new – and continue existing – incentives to encourage the creation of new industrial and manufacturing jobs.

Finding: While the proposal is not anticipated to create new industrial or manufacturing jobs, the property is currently developed with a vacant office-style building with a large surface off-street parking area. With the current Industrial designation, there are not many permitted uses that could utilize the existing building, and redeveloping the site for a manufacturing or heavy

industrial use would likely be cost-prohibitive. Therefore, as a wider variety of uses will be permitted on the subject property, and the subject property does not have any industrial or manufacturing jobs located on it currently, this goal is met.

Policy 6.4 – Vehicular access to and from industrial sites should avoid going through residential neighborhoods.

Finding: The subject property does not abut any residential properties and would not utilize and roadways which traverse residential neighborhoods; therefore, this goal is not applicable.

Policy 6.5 – The City should encourage the establishment of small industrial businesses.

Finding: By changing the designation and zone to Industrial Commercial, more industrial and commercial businesses that have a smaller footprint are permitted on the subject property, meeting the goal of encouraging more small industrial businesses.

Policy 6.6 – The conversion of industrial zones to CR (Commercial Retail) and CO (Commercial Office) zones should be discouraged unless such a conversion serves the community's interest and does not result in a deficiency of needed industrial land.

Finding: The proposed Comprehensive Plan Map Amendment from IND (Industrial) to IC (Industrial Commercial) would not permit the CR (Commercial Retail) or CO (Commercial Office) zones; therefore, this goal is not applicable.

Policy 6.7 – Industrial development should incorporate sustainable site design techniques such as green stormwater infrastructure to reduce negative impacts on the environment and community.

Finding: While the proposal does not include the construction of any new buildings or impervious areas—and no industrial development is proposed—all new development is subject to the stormwater requirements of SRC Chapter 71, which can include requirements for Green Stormwater Infrastructure (GSI) depending on the development proposed.

Policy 6.8 – Developers should be encouraged to create flexible spaces that can accommodate commercial and industrial uses in the IC (Industrial Commercial) zone.

Finding: The proposed Comprehensive Plan Map Amendment to Industrial Commercial would permit the Zone Change to IC (Industrial Commercial), which would permit a wider variety of uses than previously allowed.

9. Analysis of Quasi-Judicial Zone Change Approval Criteria

Due to normal and anticipated growth of the City, changing development patterns, governmental policy decisions affecting land use, community needs, and other factors whose specific future application cannot be anticipated, the zoning pattern established by the Uniform Development Code (UDC) cannot remain fixed in perpetuity and can be changed pursuant to SRC Chapter 265.

SRC 265.005(e) establishes the approval criteria for a Quasi-Judicial Zone Change, where the

greater the impact of the proposed Zone Change on the area, the greater the burden on the applicant to demonstrate that the criteria are satisfied. The following subsections are organized with approval criteria shown in ***bold italic***, followed by findings 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 certain conditions to ensure the criteria are met.

SRC 265.005(e)(1)(A): The Zone Change is justified based on the existence of one or more of the following:

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

Finding: The proposed Zone Change is justified based on the demonstration that the proposed zone (Industrial Commercial) is equally or better suited for the property per SRC 265.005(e)(1)(A)(iii).

The subject property is abutting other IC zoned properties to the north and south, with the southern abutting property rezoned to IC less than five years ago (Case No. CPC-NPC-ZC22-07). The existing development in the vicinity of the subject property is also more closely aligned with commercial uses, with uses such as hotels and shopping complexes located nearby. The proposal to rezone to IC will also permit the property owner—the Salem-Keizer School District—to utilize the existing building for *Education Services* uses, while also permitting additional development that is more logical with the existing land uses in the surrounding area.

As the proposed Zone Change to IC would allow for a wider variety of uses and would permit the Salem-Keizer School District to utilize the property for *Education Services*, the proposed zone is better suited for the property than the current zoning (Industrial Park), meeting the criterion.

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: As the proposal is not City-initiated, this criterion is not applicable.

SRC 265.005(e)(1)(C): The Zone Change complies with the applicable provisions of the Salem Area Comprehensive Plan.

Finding: The findings above related to the proposed Comprehensive Plan Map Amendment

from Industrial to Industrial Commercial address the applicable provisions of the Salem Area Comprehensive Plan, meeting the criterion.

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: As part of the findings for the proposed Comprehensive Plan Map Amendment, conformance with the applicable Statewide Planning Goals was also addressed, meeting the criterion.

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

Finding: The proposed Zone Change from IP (Industrial Park) to IC (Industrial Commercial) is consolidated in this application with a proposed Comprehensive Plan Map Amendment from Industrial to Industrial Commercial. As the proposed Comprehensive Plan Map designation and proposed zone are still considered to be within the industrial designation, this criterion is not applicable.

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 applicant has submitted a TPR analysis prepared by Transight Consulting, LLC and dated November 18, 2025. This analysis is required to address the Transportation Planning Rule (OAR 660-012-0060). The TPR analysis demonstrates that the proposed Zone Change will not have a significant impact on the transportation system as defined by OAR 660-012-0060 and as such, no mitigation is required in order to address the requested Zone Change. The Assistant City Traffic Engineer concurs with the TPR analysis and findings; therefore, this 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 by the proposed zone.

Finding: As described above, there are multiple existing street and utility infrastructure systems surrounding the property and available to serve future development within the property. The water, sewer, and storm infrastructure are available within surrounding streets and appear to be adequate to serve the proposed zone. Site-specific infrastructure requirements will be addressed with Site Plan Review pursuant to SRC Chapter 220 or other

applicable development processes as defined in the Unified Development Code (UDC). This criterion is met.

10. Conclusion

Based on the facts and findings presented herein, Staff concludes the proposed Minor Comprehensive Plan Map Amendment, Neighborhood Plan Change, and Zone Change, for property located at 355 Hawthorne Avenue SE satisfies the applicable approval criteria for SRC 64.025(e)(2) and SRC 265.005(e)(1).

11. Recommendation

Staff recommends that the Planning Commission adopt the facts and findings of the staff report and take the following actions for the subject property located at 355 Hawthorne Avenue SE (Marion County Assessor's Map and Tax Lot Number: 073W25D / 1600):

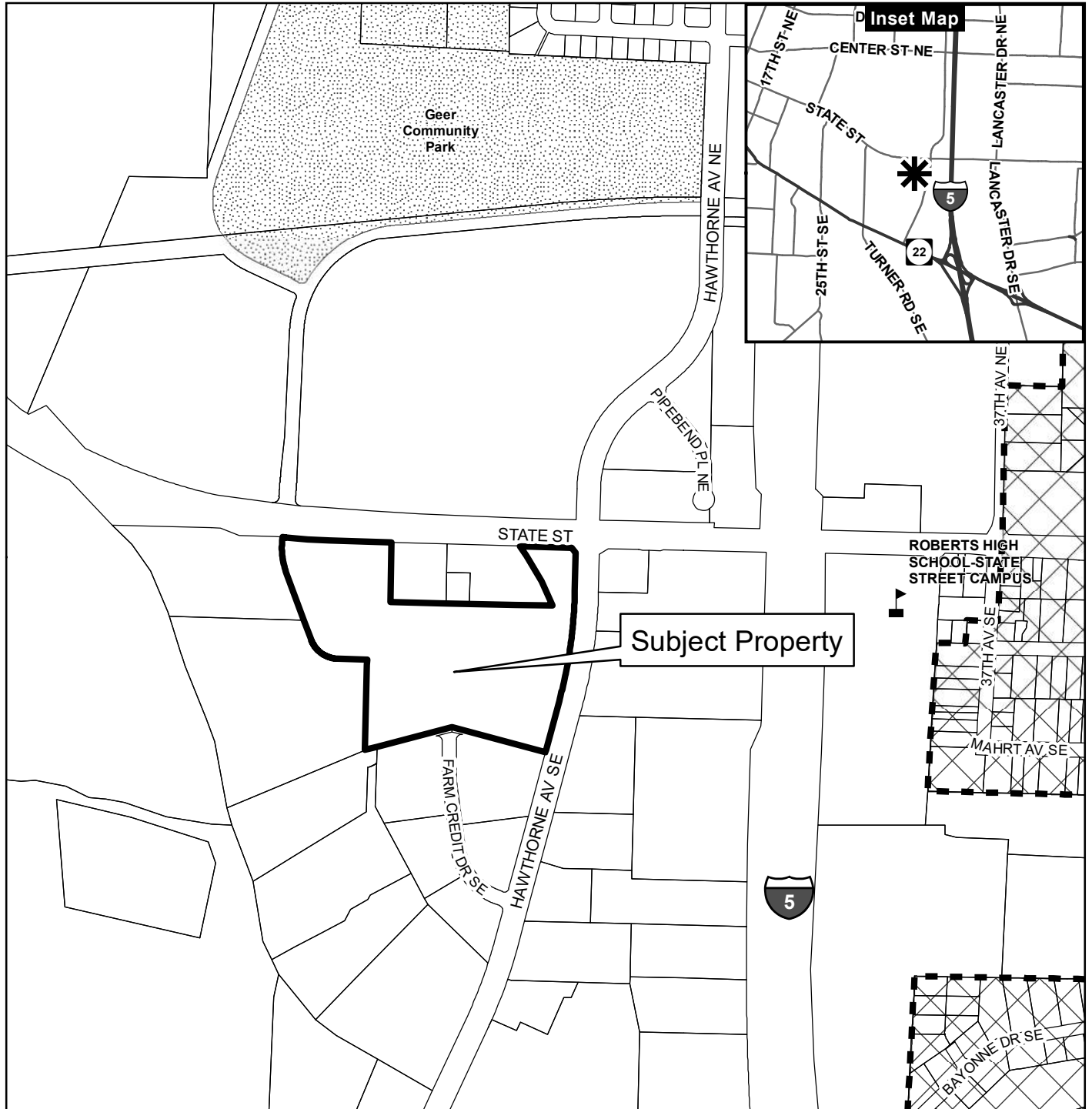
- A. **APPROVE** Minor Comprehensive Plan Map Amendment from "Industrial" to "Industrial Commercial";
- B. **APPROVE** Neighborhood Plan Map Amendment to Industrial Commercial; and
- C. **APPROVE** Zone Change from IP (Industrial Park) to IC (Industrial Commercial)

Attachments:








- A. Vicinity Map, Comprehensive Plan Map, and Zoning Map
- B. SESNA Meeting Documents
- C. Transportation Planning Rule (TPR) Analysis
- D. SESNA Letter of Support

Prepared by: Quincy Miller, AICP, Planner II

Vicinity Map 355 Hawthorne Avenue SE



Legend

-  Tax Lot
-  Urban Growth Boundary
-  City Limits
-  Parks
-  Outside Salem City Limits
-  Historic District
-  Schools

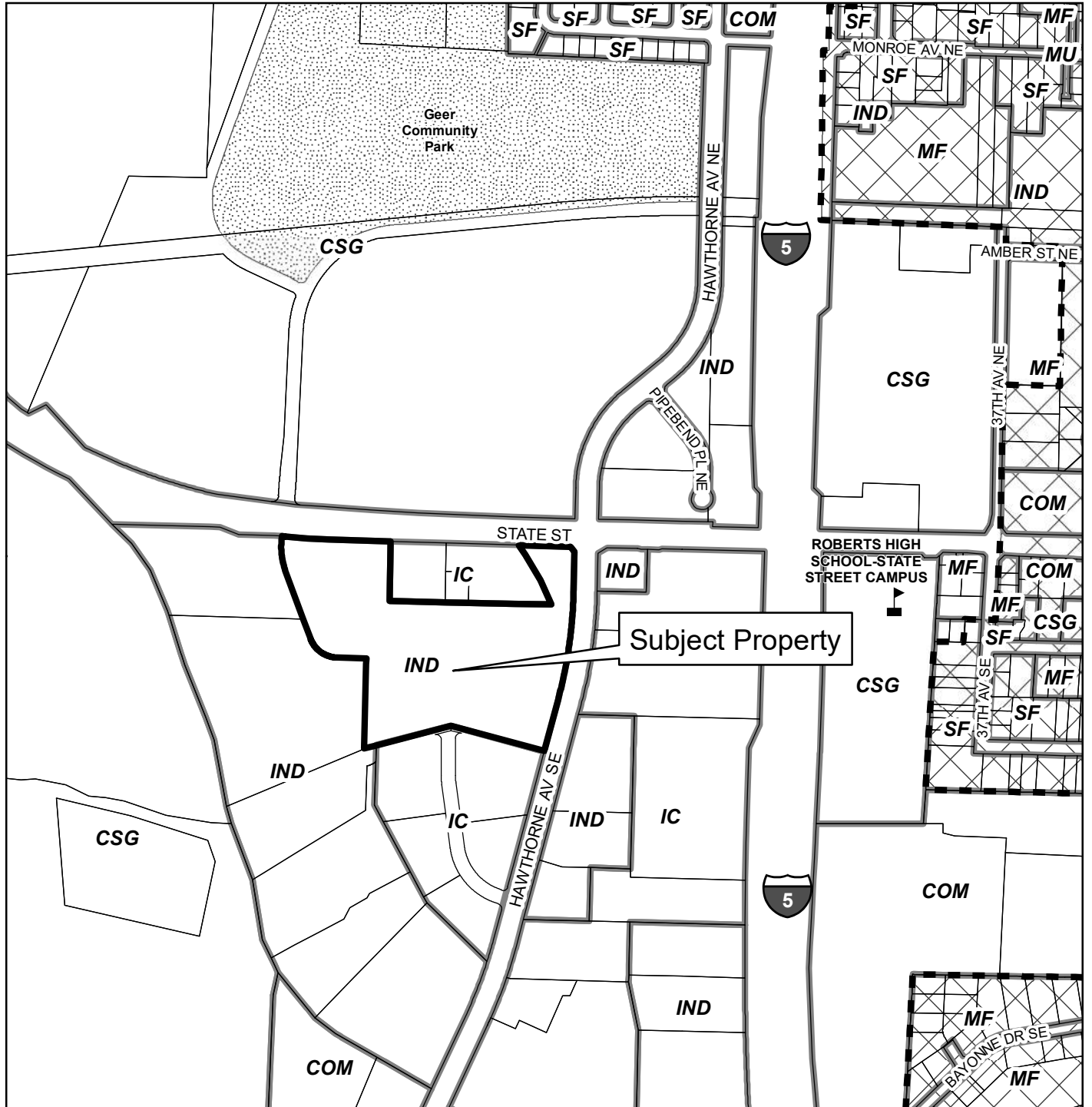


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Comprehensive Plan Map

Proposed Comprehensive Plan Amendment to IC (Industrial Commercial)



Legend

- Comprehensive Plan
- City Limits
- Outside Salem City Limits
- Tax Lot
- Parks
- Schools

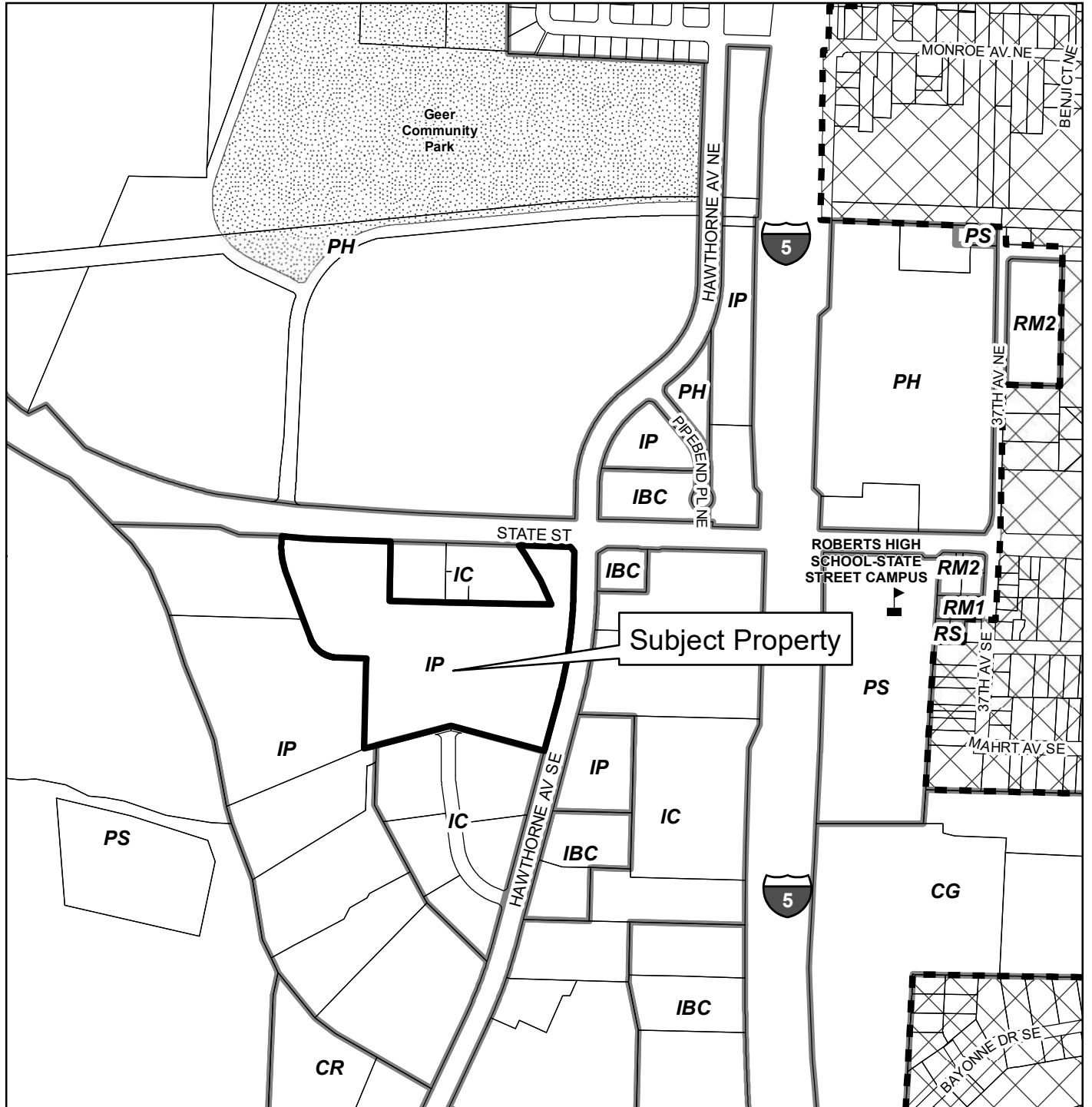


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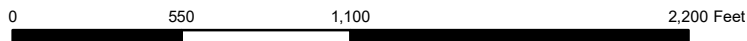
Zoning Map

Proposed Zone Change to IC (Industrial Commercial)



Legend

- | | | | |
|--|---------------------------|--|---------|
| | Zoning | | Tax Lot |
| | City Limits | | Parks |
| | Outside Salem City Limits | | Schools |



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Hannah F. Stevenson

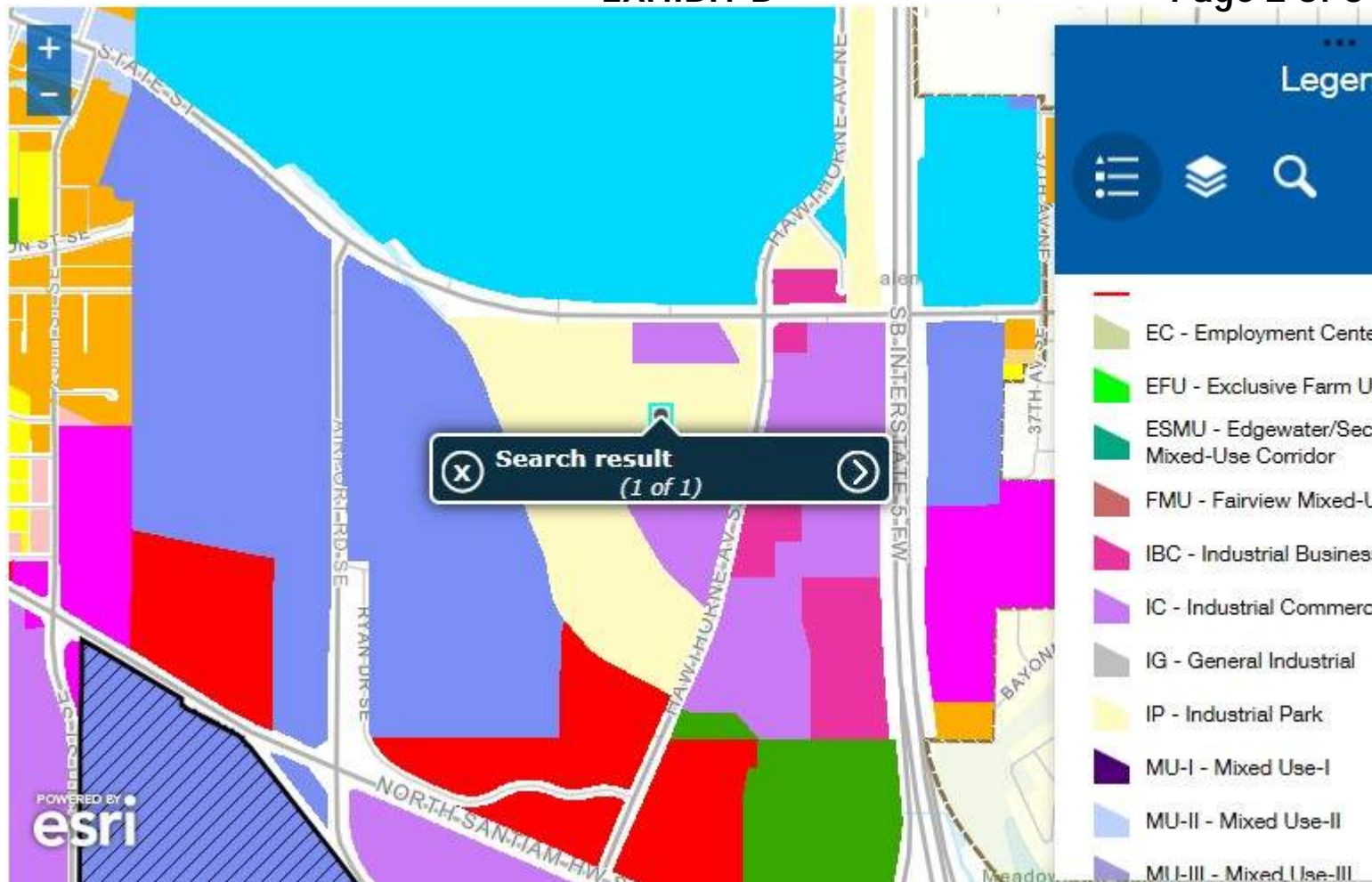
From: Margaret Gander-Vo
Sent: Wednesday, January 28, 2026 11:54 AM
To: spriem@hotmail.com; landuse@sesna.community; Lisa Anderson-Ogilvie
Cc: Rachel J. Ballard; Hannah F. Stevenson; Brenda Garcia De Alba
Subject: Salem Keizer School District - Hawthorne Property Zone Change Neighborhood Association Meeting Request

Hello Lisa, Shannon, et. al:

The Salem-Keizer School District (the “District”) is going to be submitting and Zone Change/Comprehensive Plan Amendment Application for the approximately 15.90-acre lot commonly known as 355 Hawthorne Ave SE in Salem, Oregon and depicted below which it recently purchased from Wells Fargo who most recently used the building as a call center.



The proposal is to change from the current “Industrial” (IND) on its Comprehensive Plan Map Designation to “Industrial Commercial” (IC) and from the existing “Industrial Park” (IP) zoning to “Industrial Commercial” (IC). This will allow the District to use the property for “Basic Education” uses, which is not permitted under the current zoning. At this point, there will not be any proposed development on the Property, the short-term goal for the District is to utilize the property for server storage and teacher and staff training. In the long run, the goal for this property is to use it as a secondary location for some of the District’s alternative education programs. Due to the significant overlap between the uses permitted in the IP and IC zones and the zoning in the surrounding area, the proposed change will allow the District to use the property in a manner which will serve the District’s needs while remaining consistent with the zoning and uses in the surrounding area which is shown below:



We intend to attend the SESNA neighborhood association meeting in lieu of holding an open house, pursuant to Salem Revised Code 300.320. We believe the next meeting is Feb. 24th at 6:30PM. Would it be possible to be added to your agenda?

In the interim, please let me know if there are any questions or concerns that the District can respond to or be prepared to address at the meeting, my contact information is below.

Best wishes,
Margaret Y. Gander-Vo
 Lawyer – Real Estate and Land Use



Park Place, Suite 200 | 250 Church Street SE | Salem, Oregon 97301
 office: 503.399.1070 | direct: 503.485.4271 | fax: 503.371.2927

[Email](#) | [Web](#)

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APPLICANT:
Layne Asset Group, 8787 1st St.
Seattle, WA 98148

SUBJECT PROPERTY:
10000 1st Ave SW, Seattle

PROPOSAL:
The applicant is proposing to build a new 100,000 sq ft building on the subject property. The building will be used for office space and will be built in accordance with the applicable zoning code. The applicant is requesting a rezoning of the subject property from S-10000 to S-10000-200.

INTENTIONS IN PREPARING THIS ABOUT THE PROPOSAL?

APPROVALS TO BE OBTAINED:
Rezoning, Building Permit, and Occupancy Permit.

CONTACT INFORMATION:
Layne Asset Group
10000 1st Ave SW
Seattle, WA 98148
Phone: (206) 461-1234
Email: info@layneassetgroup.com

QUESTIONS?
Contact Layne Asset Group at (206) 461-1234 or email@layneassetgroup.com



APPLICANT:
Saville Ridge Farms, District 24

SUBJECT PROPERTY:
255 Hawthorne Ave SE, Salem

PROPOSAL:
Installation of a large-scale tree preservation and site change to support the expansion and siting of the subject property. The project will include the installation of a large-scale tree preservation and site change to support the expansion and siting of the subject property. The project will include the installation of a large-scale tree preservation and site change to support the expansion and siting of the subject property.

ATTEND THE NEXT SOUTHEAST NEIGHBORHOOD ASSOCIATION (SENA) MEETING!

SENA MEETING DETAILS:
Date: February 26, 2024 | Time: 6:00pm - 8:00pm
Location: Home Park Middle Building
1421 13th Street SE, Salem

QUESTIONS?
Contact: Sarah's Neighborhood
Mark Engstrom & Associates
1000 Broadway Blvd SE, Suite 100
Salem, OR 97302

INTERESTED IN HEARING MORE ABOUT THE PROPOSAL?



SESNA 2026 - Monthly Public Meeting - Public agenda

SESNA Agenda

Tuesday, Feb 24, 2026 from 6:30 to 8:15 p.m.

Wesleyan Capital Park Church (sanctuary)

Meeting open to the public. Contact Shannon at

spriem@hotmail.com

- **6:30 p.m.** / Introductions, approval of minutes, announcements, additions to agenda
- **6:35 p.m. / Guests**
 - Police update:** Officer Lewis Menges, if available
 - Brandon Klukis**, city street maintenance manager: How sidewalk repair decisions are made presentation with Q and A.
 - Two zone change proposals** (10 minutes each):
 - 1) Mark Shipman, Saalfeld Griggs PC: Partition property (2757 and 2767 22nd St. SE) to two parcels for warehouse, offices.
 - 2) Dave Hughes, SK School District: 15.9-acre lot at 355 Hawthorne Ave. SE; zone change from Industrial to allow for education purposes, e.g. training.
 - Linda Nishioka**, City Council
- **7:45 p.m.-- Neighborhood concerns** – open session to raise questions, concerns.
- **8:00 p.m. -- Old Business/Committees**
 - Wesleyan Church update – Dave T.
 - Flood Management Committee – Updated plan!
 - Website
- **8:15 p.m. Good of the Order**
- Next meeting will be March 24 at the church.

We have a great website! Check us out at <https://sesna.community>

SESNA MEETING
SUMMARY OF COMMENTS
FEBRUARY 24, 2026
FROM DAVID HUGHES, SKSD

A recap of the neighborhood association meeting:

I shared the need to change from the current zoning to the new IC zoning and that we were planning to use it for staff development meetings and our data center in the short term. Further shared our long-term plan is to turn it into a reimagined alternative education center. Had a couple of very generic questions that I answered one specific comment from a former educator from Illinois who thought what we were doing long term was great.

I was asked what they could do for us. I told them support for the zone change, including a letter would be appreciated. Emily was there and when they asked me how soon we needed the letter, I shared Emily's colleague is who we were working with, with a plan to submit the request very soon. I asked Emily if the letter could be included or come after, she was kind enough to explain the process, they will get a notice, and a response would be due 14 days after.



Date:	November 18, 2025
To:	Mark Shipman, Saalfeld Griggs, PC
From:	Joe Bessman, PE
Project Reference No.:	2102
Project Name:	355 Hawthorne Avenue Rezone



2027?

The purpose of this memorandum is to provide a zone change analysis for the property located at 355 Hawthorne Avenue SE in Salem, Oregon. This property, tax lot 073W25D001600, borders Hawthorne Avenue SE on the east side and extends to State Street on the north. This proposed project is seeking the rezoning and a Comprehensive Plan Amendment for the site from *Industrial Park (IP)* to *Industrial Commercial (IC)*.

The 15.9-acre parcel was formerly used by Wells Fargo and Wachovia for a call center and currently includes an approximately 77,000 square-foot building surrounded by an expansive parking area. It is surrounded by *Industrial Park* zoning to the west and *Industrial Commercial* on all other sides, with *Public Health* zoning further to the north. No development is proposed as part of this rezone application. Figure 1 illustrates the location of the site and Figure 2 depicts the surrounding zoning based on information provided within Salem's GIS application.



Figure 1. Site Vicinity Map. Source: Marion County GIS



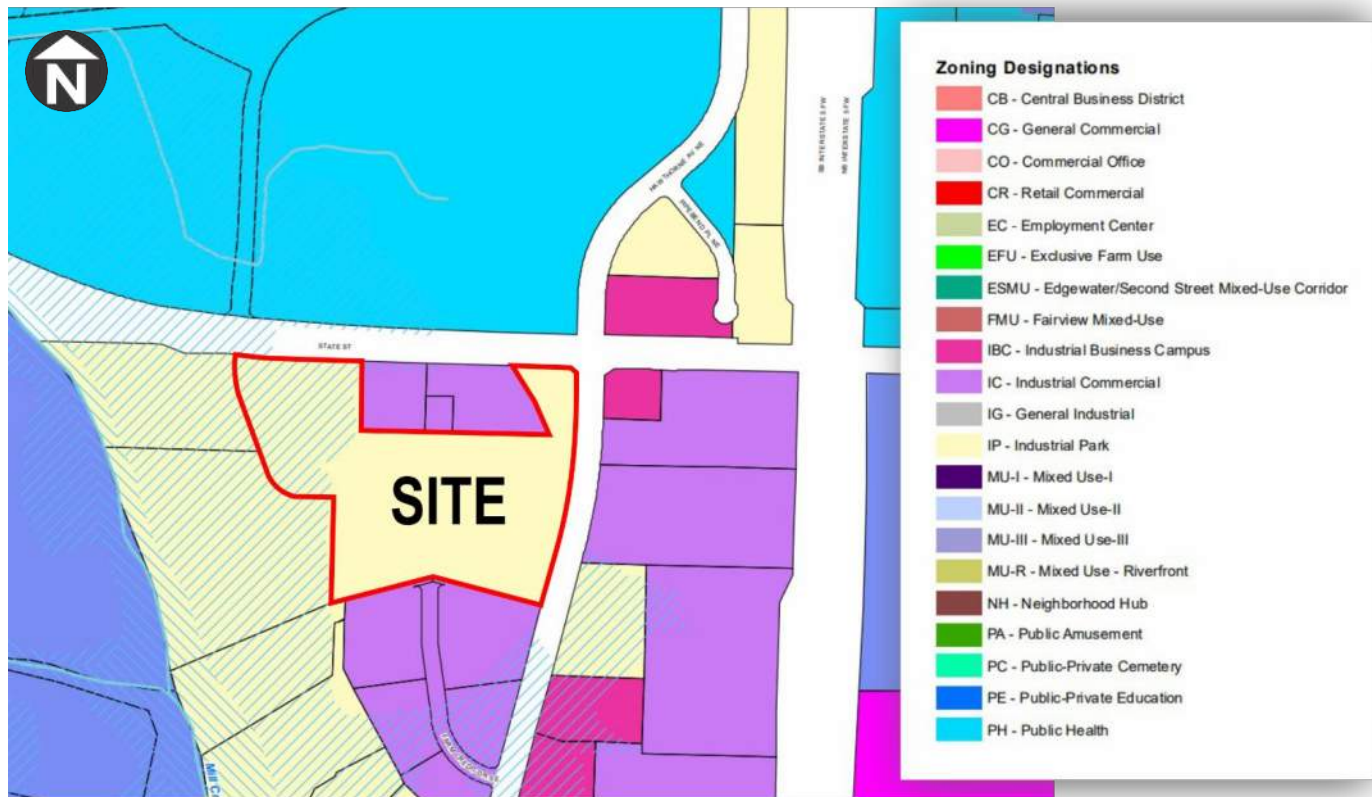


Figure 2. Site Vicinity Map and Current Zoning. Source: salem.maps.arcgis.com.

TRANSPORTATION PLANNING RULE COMPLIANCE

The subject application proposes a Comprehensive Plan amendment and rezone of a parcel from *Industrial Park* zoning to *Industrial Commercial*. In order to rezone the subject property the application is required to demonstrate compliance with the Transportation Planning Rule (TPR) section on Plan and Land Use Regulation Amendments (OAR 660-12-0060). OAR 660-012-0060(1) and (2) establish a two-step process for evaluating a land use amendment's impact on the transportation system. The first step in assessing an amendment's potential transportation impact is to compare the trip generation potential of the property assuming a "reasonable worst-case" development scenario under the existing and proposed zoning. If the trip generation potential increases under the proposed zoning, additional operational analysis may be required to assess whether the rezone will "significantly affect" the transportation system. Conversely, if the trip generation under the proposed zoning is equal to or less than that under the existing zoning, no additional operational analysis is necessary to conclude that the proposal does not "significantly affect" the transportation system. A review of the purpose and allowance within these zoning designations is provided below.

Existing and Proposed Zoning Designations and Purpose

The stated purpose of the current *Industrial Park* zoning (per Salem Revised Code 553.001) is as follows:

The purpose of the Industrial Park (IP) Zone is to implement the industrial designation of the Salem Area Comprehensive Plan through the identification of allowed uses and the establishment of development standards. The IP zone allows industrial uses, along [with] uses providing services and support to industry, in a park like setting.

In contrast, Salem Revised Code 551.001 states the purpose of the *Industrial Commercial* zone as follows:

The purpose of the Industrial Commercial (IC) Zone is to implement the industrial commercial designation of the Salem Area Comprehensive Plan through the identification of allowed uses and the establishment of development standards. The IC zone generally allows a wide variety of retail, office, heavy commercial, light manufacturing, and warehousing activities.

A comparison of the more intense allowable uses (from a trip generation perspective) between the zoning designations is summarized in Table 1.

Table 1. Allowable Uses by Zoning Designation

Use	Allowed in IP Zone?	Allowed in IC Zone?
Manufactured Home	No	Yes
Multifamily Homes located within mixed-use building	No	Yes
Short-Term Commercial Lodging	Yes	Yes
Eating and Drinking Establishments	Yes	Yes
Retail Sales	Yes provided products sold primarily manufactured on-site and retail space does not exceed 30% of total floor area	Yes
Personal Services	No	Yes
Postal Services and retail financial services	Yes Only banks, credit unions and customer oriented financial institutions permitted	Yes
Office	Yes Specific uses limited to accounting services, consulting, call centers, real estate, etc.	Yes
Laboratory Research and Testing	Yes	Yes
Commercial Entertainment – Indoor	Yes Limited to health clubs, gyms, and membership sports and recreation clubs	Yes located >200 feet from residential zone
Outpatient Medical Services and Laboratories	No	Yes
Government Services	No	Yes
General Manufacturing	Yes	Yes Limited to certain uses

In review of Salem Revised Code, the main difference between the *Industrial Park* zoning and *Industrial Commercial* is the type of commercial uses that would be allowed. The IP zoning is intended to promote employment/industrial uses, blending industrial uses with business park uses such as those planned in the

City’s Mill Creek Corporate Center along Kuebler Boulevard. This zoning allows more limited commercial uses (retail sales must not exceed 30% of the site’s building area), whereas the *Industrial Commercial* would allow a wide variety of commercial uses without this similar limitation. There does not appear to be a limitation on food and beverage uses within either zone, and both zones have similar lot coverage requirements.

TRIP GENERATION COMPARISON

Using the higher-intensity uses listed within Table 1, trip generation estimates were prepared for the site to assess whether the rezone has the potential to increase the number (and types) of trips from the site.

Existing Industrial Park Zoning Scenario

The site currently has an existing approximately 77,000 square-foot building on the south side of the site that was formally used as a call center. The northern portion of the site is undeveloped. The existing zoning potential considers the use of the entire 15.9-acre site for the highest reasonable trip generation potential. While the call center was a previous use of the site, the existing zoning would allow the entire site to be developed with potentially more intense uses, which could include eating establishments, a bank, manufacturing combined with retail sales, or a fitness center/gym. A review of the trip generation potential of some of the higher trip generating uses is shown in Table 2.

Table 2. Outright Allowable IP Trip Generation Rates

Land Use	ITE Land Use Code/Surrogate	Weekday Daily Trips		Weekday PM Peak Hour Trip Rate	
Eating and Drinking Establishment	ITE 930 (Fast Casual)	225.89/KSF		14.35 PM Trips/KSF	
	ITE 932 (High-Turnover Sit-Down Restaurant)	103.75/KSF		9.18 PM Trips/KSF	
	ITE 933 (Fast Food Restaurant without Drive-Thru)	413.41/KSF		36.73 PM Trips/KSF	
Bank	ITE 912	98.85/KSF		21.03 PM Trips/KSF	
Retail Sales & Manufacturing	ITE 822 (Strip Retail Plaza)	54.45/KSF	19.32/KSF	6.29 PM Trips/KSF	2.33 PM Trips/KSF
	ITE 140 (Manufacturing)	4.27/KSF		0.63 PM Trips/KSF	
Offices	ITE 710	7.83/KSF		1.18 PM Trips/KSF	
Gym	ITE 492 <i>Range: 5,000 – 65,000 sf</i> <i>Average: 30,000 sf</i>	30.02/KSF <i>limited data</i>		3.77 PM Trips/KSF	

Table 2 shows that an eating establishment and a bank are the most intense allowable uses, but these uses would only comprise a small portion of this site. Given the site location near hotels to the east, state offices to the west, and other similar uses nearby, the extension of similar uses throughout this site is a more reasonable use for the overall property. A bank and separate eating establishment, even multiple, would only require limited acreage. Therefore, it is reasonable to assume a mix of additional uses, such as a gym, and manufacturing buildings with limited retail.

Assuming a floor-to-area ratio of 0.25 (reflective of typical lot coverage maximums while retaining surface parking), the site can accommodate approximately 173,000 square-feet of *Industrial Park* uses. Using the average size of a gym, bank, and restaurant provided in the ITE Manual and assuming the rest is manufacturing and retail, reasonable land uses for the site could include:

- 30,000 square-foot gym
- 4,000 square-foot bank
- Three separate 3,000 square-foot restaurants
- 130,000 square-foot manufacturing and retail (91,000 sf manufacturing & 39,000 sf retail)

Based on this land use scenario, trip generation estimates were prepared based on the most current edition of the Institute of Transportation Engineers' (ITE) standard reference *Trip Generation, 12th Edition*. The land use categories that best describe each use are described in the ITE as follows:

- **Land Use 492: Health/Fitness Club** - *A health/fitness club is a privately-owned facility primarily focused on individual fitness or training. It typically provides exercise classes, fitness equipment, a weight room, spa, lockers rooms, and a small restaurant or snack bar. This land use may also include ancillary facilities such as a swimming pool, whirlpool, sauna, limited retail, and tennis, pickleball, racquetball, or handball courts. These facilities are membership clubs that may allow access to the public for a fee.*
- **Land Use 912: Drive-in Bank** - *A bank is a financial institution that can offer a wide variety of financial services. A drive-in bank provides banking services for a motorist through a teller station. A drive-in bank may also serve patrons who walk into the building. The drive-in lanes may or may not include an automatic teller machine (ATM).*
- **Land Use 930: Fast Casual Restaurant** - *A fast casual restaurant is a sit-down restaurant with no (or very limited) wait staff or table service. A customer typically orders off a menu board, pays for food before it is prepared, and seats themselves. The menu generally contains higher-quality, made-to-order food items with fewer frozen or processed ingredients than at a fast-food restaurant. Most patrons eat their meal within the restaurant, but a significant portion of the restaurant sales can be carry-out orders. A fast casual restaurant may have a drive-through window or external order pickup window. A fast casual restaurant typically serves lunch and dinner; some also serve breakfast. The typical duration of stay for an eat-in customer is 40 minutes or less.*
- **Land Use 140: Manufacturing** - *A manufacturing facility is an area where the primary activity is the conversion of raw materials or parts into finished products. The size and type of activity may vary substantially from one facility to another. In addition to the actual production of goods, a manufacturing facility typically has an office and may provide space for warehouse, research, and associated functions.*

The ITE Manual does not have a land use category that blends retail sales with an associated manufacturing use. The sales characteristics of this use would be different than a general retail center, and would likely fall within the discontinued "Specialty Retail" classification. As there is no better land use category, the general *Strip Retail Plaza* classification was applied to this portion of the use as this addresses a wide range of commercial uses and is described below.

- **Land Use 822: Strip Retail Plaza (<40k)** - *A strip retail plaza is an integrated group of commercial establishments planned, developed, owned, and managed as a unit. Each study site in this land use has less than 40,000 square feet of gross leasable area (GLA). Because a strip retail plaza is open-air, its GLA is the same as the gross floor area of the building.*

With a multi-use site it was assumed that 10% of the trips would occur on-site between the various uses. Specific ITE pass-by trips rates were applied to the bank and restaurant uses. While retail typically has pass-by trips, given the specialized interest associated with manufacturing, no pass-by trips were assumed for the manufacturing/retail portion of the site.

Table 3. Trip Generation Potential of Industrial Park Zoning (ITE Trip Generation, 12th Edition)

Land Use	ITE Code	Size/Units	Weekday Daily Trips	Weekday PM Peak Hour		
				Total	In	Out
Health/Fitness Club <i>Internal Trips (10%)</i>	492	30KSF	901 -90	113 -11	64 -6	49 -5
Drive-In Bank <i>Internal Trips (10%)</i> <i>Pass-by Trips (35%)</i>	912	4KSF	395 -40 -124	84 -8 -27	42 -4 -13	42 -4 -14
Fast Casual Restaurant <i>Internal Trips (10%)</i> <i>Pass-by Trips (43%)</i>	930	9KSF	2,033 -203 -787	129 -13 -50	68 -7 -26	61 -6 -24
Manufacturing <i>Internal Trips (10%)</i>	140	91KSF	389 -39	57 -6	17 -2	40 -4
Strip Retail Plaza <i>Internal Trips (10%)</i>	822	39KSF	2,124 -212	245 -25	123 -13	122 -12
Total Trips			5,842	628	314	314
<i>Internal Trips</i>			-584	-63	-32	-31
<i>Pass-by Trips</i>			-911	-77	-39	-38
Net Trip Impacts			4,347	488	243	245

Proposed Industrial Commercial Zoning Scenario

Review of the allowable uses within IC zoning shows that the most intense allowable use is likely also a mixed-use development, but with commercial and office on the ground floor and residential units above. The commercial space could accommodate eating and drinking establishments and retail uses, all of which are included in the *Shopping Plaza* land use category. Table 4 summarizes the trip rates of the higher intensity uses allowed outright within *Industrial Commercial* zoning.

Table 4. Outright Allowable IC Trip Generation Rates

Land Use	ITE Land Use Code/Surrogate	Weekday Daily Trips	Weekday PM Peak Hour Trip Rate
Eating and Drinking Establishment	ITE 930 (Fast Casual)	225.89/KSF	14.35 PM Trips/KSF
	ITE 932 (High-Turnover Sit-Down Restaurant)	103.75/KSF	9.18 PM Trips/KSF
	ITE 933 (Fast Food Restaurant without Drive-Thru)	413.41/KSF	36.73 PM Trips/KSF
Multifamily Housing (Low-Rise)	ITE 220	6.21/Unit	0.52 PM Trips/Unit
Multifamily Housing (Mid-Rise)	ITE 221	4.46/Unit	0.38 PM Trip/Unit
Retail Sales	ITE 822 (Strip Retail Plaza)	54.45/KSF	6.29 PM Trips/KSF
	ITE 821 (Shopping Plaza 40-150k, no supermarket)	65.38/KSF	4.76 PM Trips/KSF
Offices	ITE 710	7.83/KSF	1.18 PM Trips/KSF

Assuming a 0.25 floor-to-area ratio and a 60/40 split of commercial and office space on the ground floor would result in approximately 104,000 square-feet of commercial space and approximately 69,000 square-feet of office space. Based on the maximum height restriction of 70 feet for buildings within this zone, the residential levels would likely be limited to five floors. The land use categories that best describe each use are described in the ITE as follows:

- Land Use 221: Multifamily Housing (Mid-Rise)** - *Mid-rise multifamily housing is a residential building with between four and 10 floors of residence. Access to individual dwelling units is through an outside building entrance, a lobby, elevator, and a set of hallways.*
- Land Use 821: Shopping Plaza (40-150k)** - *A shopping plaza is an integrated group of commercial establishments planned, developed, owned, and managed as a unit. Each study site in this land use has between 40,000 and 150,000 square feet of gross leasable area (GLA). The term “plaza” in the land use name rather than “center” is simply a distinction between the different shopping center size ranges. Various other names are commonly used to categorize a shopping plaza within this size range depending on its specific size and tenants, such as neighborhood center, community center, and fashion center.*

A supermarket is often the major tenant of a shopping plaza, but many shopping centers are anchored by home improvement, discount, or other stores. A shopping plaza typically contains more than retail merchandising facilities. Common tenants include office space, a movie theater, restaurants, a post office, banks, a health club, and recreational facilities. A shopping plaza is almost always open-air and the GLA is the same as the gross floor area of the building.

- Land Use 710: General Office Building** - *A general office building is a building with multiple tenants that employ persons in the management, direction, or conduct of legal, accounting, engineering, consulting, real estate, insurance, financial, or other professional services.*

If two or more general office buildings are in close physical proximity (within walking distance) and function as a unit (perhaps with a shared parking facility and common or complementary

tenants), the total gross floor area or employment of the paired office buildings can be used for calculating the site trip generation.

The ITE Manual has a land use classification for mixed-use buildings, but the data within this newer classification is very limited and was not considered statistically valid (but would result in much lower trip rates than those shown).

This is an oddly specific prime number of units.

With a multi-use site it was assumed that 10% of the trips would occur on-site between the various uses. Specific ITE pass-by trips rates were applied to the shopping plaza use. Table 5 summarizes the potential trip generation of the site with *Industrial Commercial* zoning.

Table 5. Trip Generation Potential of Industrial Commercial Zoning (ITE Trip Generation, 12th Edition)

Land Use	ITE Code	Size/Units	Weekday Daily Trips	Weekday PM Peak Hour		
				Total	In	Out
Multifamily (Mid-Rise) <i>Internal Trips (10%)</i>	221	151 Units	674 -67	57 -6	36 -4	21 -2
Shopping Plaza <i>Internal Trips (10%)</i> <i>Pass-by Trips (40%)</i>	821	104KSF	6,800 -680 -2,448	495 -50 -178	243 -24 -88	252 -26 -90
General Office Building <i>Internal Trips (10%)</i>	710	69KSF	540 -54	81 -8	13 -1	68 -7
Total Trips			8,014	633	292	341
<i>Internal Trips</i>			-801	-64	-29	-35
<i>Pass-by Trips</i>			-2,448	-178	-88	-90
Net Trip Impacts			4,765	391	175	216

Without Supermarket

TRIP GENERATION POTENTIAL COMPARISON

Table 6 presents a comparison of the trips that could be generated by the existing and proposed zoning per the assumptions outlined above. As shown in this table, the proposed amendment and rezoning associated with the site results in more trips on a weekday daily trip basis and fewer trips during the weekday p.m. peak hour. It should be noted that the Shopping Plaza land use already considers internal trips between the various commercial uses including retail and eating and drinking establishments. This information is not as readily available between individual uses such as between the gym, bank and restaurants reviewed for the existing zoning. The net trip impacts under the existing zoning may be lower if the internalization of trips is greater than 10-percent. Regardless, the change in zone shows minimal impact during the weekday p.m. peak hour when adjacent street traffic volumes are highest.

Table 6. Trip Generation Comparison

Land Use	ITE Code	Size/Units	Weekday Daily Trips	Weekday PM Peak Hour		
				Total	In	Out
<i>Rezone to Industrial Commercial Zoning</i>						
Total Trips			8,014	633	292	341
<i>Internal Trips</i>			-801	-64	-29	-35
<i>Pass-by Trips</i>			-2,448	-178	-88	-90
Net Trip Impacts			4,765	391	175	216
<i>Existing Industrial Park Zoning</i>						
Total Trips			5,842	628	314	314
<i>Internal Trips</i>			-584	-63	-32	-31
<i>Pass-by Trips</i>			-911	-77	-39	-38
Net Trip Impacts			4,347	488	243	245
<i>Trip Difference (Proposed – Existing Zoning Potential)</i>						
Total Trips			+2,172	+5	-22	+27
<i>Internal Trips</i>			-217	-1	+3	-4
<i>Pass-by Trips</i>			-1,537	-101	-49	-52
Net Trip Impacts			+418	-97	-68	-29

Salem Revised Code Sec. 803.015 provides the applicable requirements for traffic impact studies. This section of Code is not specific to the study requirements for a rezone application, which by default requires compliance with the Transportation Planning Rule. However, with the site showing that the outright allowable uses have the potential to generate fewer trips during the critical weekday p.m. peak hour (the time period assessed within City of Salem’s Transportation System Plan), no analysis or study should be necessary at this time, as there will be no comparative impact.

Salem Revised Code Sec. 803.015 further specifies that a traffic impact study is required if a development generates “200 or more daily vehicle trips onto a local street or alley, or 1,000 daily vehicle trips onto a collector, minor arterial, major arterial, or parkway.” This section of Code is not specific to the study requirements for a rezone application, but with the site providing access onto State Street and Hawthorne Avenue (classified as *Major Arterials*) the “+1000” ADT threshold will not be met.

TRIP DISTRIBUTION AND ASSIGNMENT

Trips to and from the site have access to the transportation system at the traffic signal at the Geer Drive-Kettle Court/State Street intersection and at the Hawthorne Avenue/Kettle Court intersection. Figures 3 and 4 provide an estimate of the trip assignment for each zoning scenario and the estimated difference in trips to illustrate how the impacts could vary with the rezone.

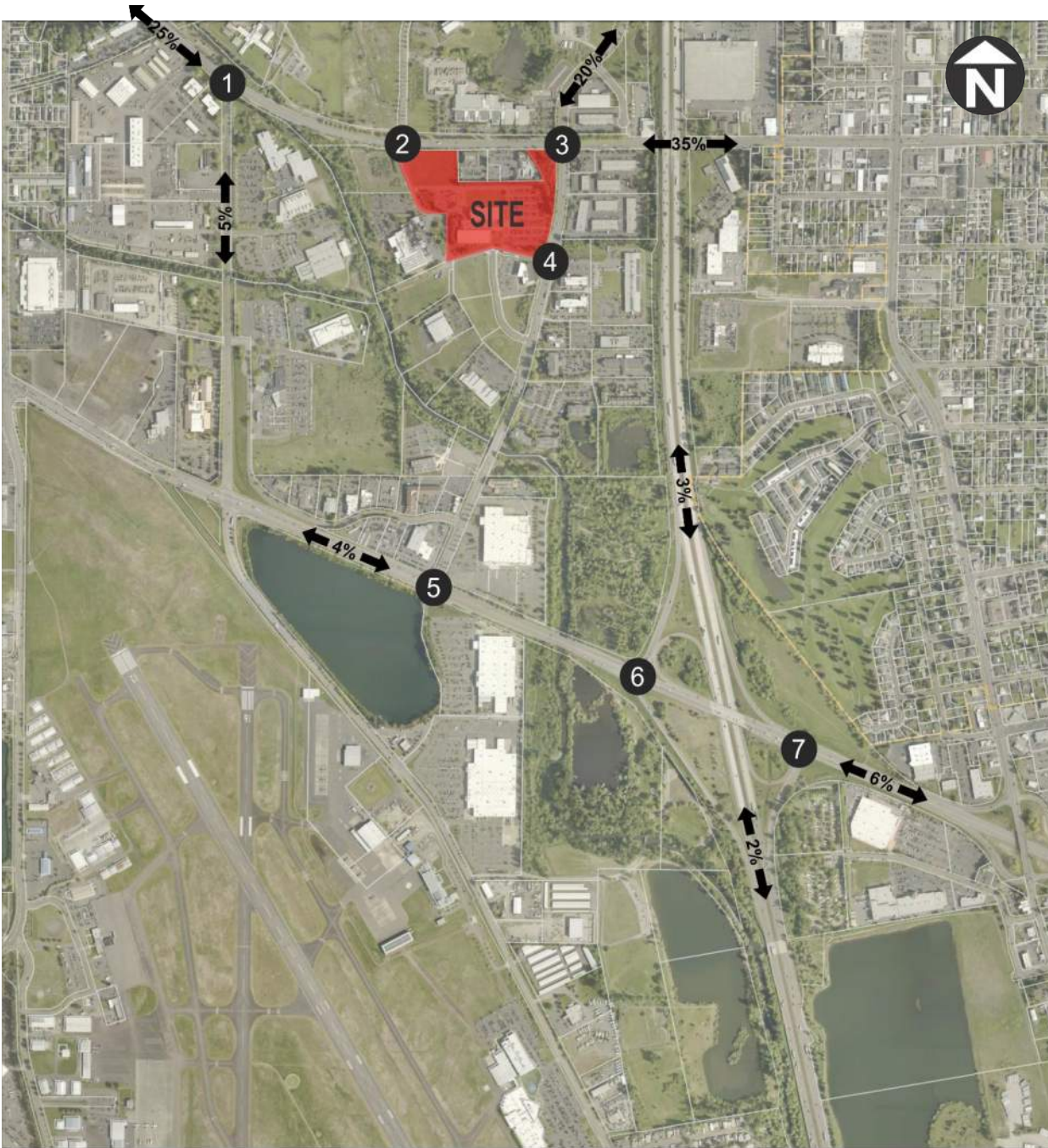


Figure 3. Estimated Trip Distribution, Weekday PM Peak Hour.

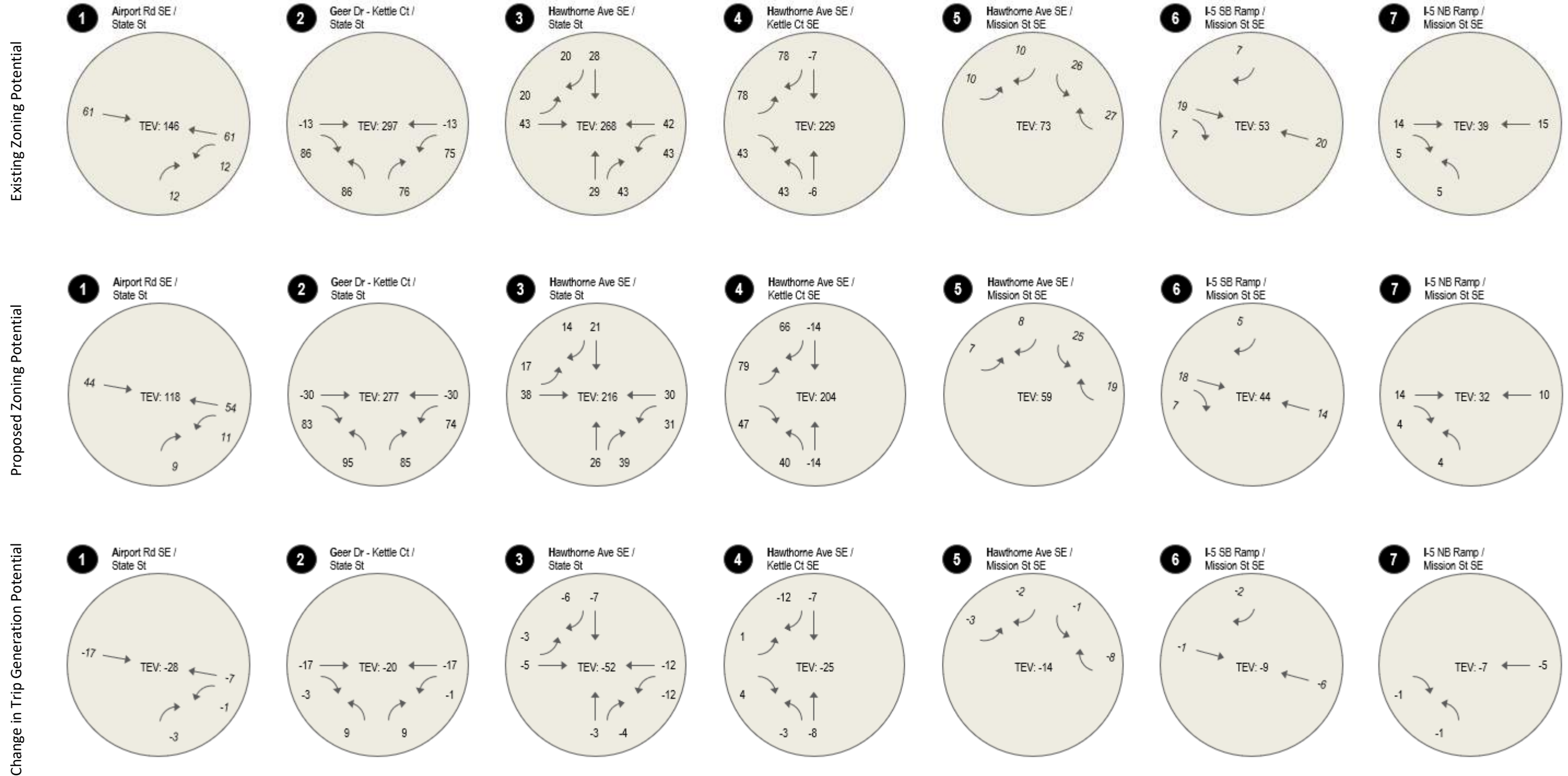


Figure 4. Estimated Trip Assignment, Weekday PM Peak Hour.

TRANSPORTATION PLANNING RULE COMPLIANCE

OAR Section 660-012-0060 of the Transportation Planning Rule (TPR) sets forth the relative criteria for evaluating plan and land use regulation amendments. Table 7 summarizes the criteria in Section 660-012-0060 and the applicability to the proposed rezone application.

Table 7. Summary of Criteria in OAR 660-012-0060

Section	Criteria	Applicable?
1	Describes how to determine if a proposed land use action results in a significant impact.	Yes, see response below
2	Describes measures for complying with Criterion #1 where a significant impact is determined.	No
3	Describes measures for complying with Criteria #1 and #2 without assuring that the allowed land uses are consistent with the function, capacity and performance standards of the facility.	No
4	Determinations under Criteria #1, #2, and #3 are coordinated with other local agencies.	Yes
5	Indicates that the presence of a transportation facility shall not be the basis for an exception to allow development on rural lands.	No
6	Indicates that local agencies should credit developments that provide a reduction in trips.	No
7	Outlines requirements for a local street plan, access management plan, or future street plan.	No
8	Defines a mixed-use, pedestrian-friendly neighborhood.	No
9	Outlines requirements under which a local government may find that an amendment to a zoning map does not significantly affect an existing and planned transportation facility.	No
10	Outlines requirements under which a local government may amend a plan without applying performance standards related to motor vehicle traffic congestion, delay or travel time.	No
11	Outlines requirements under which a local government may approve an amendment with partial mitigation.	No

As noted in Table 7, there are eleven criteria that apply to Plan and Land Use Regulation Amendments. Of these, Criteria #1 and #4 are applicable to the proposed land use action. These criteria are provided below in italics with responses shown in standard font.

OAR 660-012-0060 (1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:

(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);

Response: Based on the reduction in trip generation potential and minimal impact between the existing IP and proposed IC zoning a significant impact will not occur.

(b) Change standards implementing a functional classification system; or

Response: The proposed rezone does not seek to change the standards of the City's functional classification system, and with a theoretically lower trip generation potential does not modify any roadway classifications.

(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection. If a local government is evaluating a performance standard based on projected levels of motor vehicle traffic, then the results must be based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.

(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

Response: Based on the reduction in trip generation potential between the existing IP and proposed IC zoning a significant impact will not occur. Additionally, the site is located in an industrial area with both IC and IP zoning. The type of travel and access is consistent with both the existing and proposed zoning.

(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or

Response: The reduction in trips improves intersection operations throughout the study area.

(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.

Response: The reduction in trips does not degrade intersection or corridor performance.

OAR 660-12-0060(4) Determinations under sections (1)–(3) of this rule shall be coordinated with affected transportation facility and service providers and other affected local governments.

Response: The City of Salem coordinates land use applications with affected agencies. It is understood that this land use application will be provided to other agencies (as appropriate) for their review and comment.

FINDINGS AND RECOMMENDATIONS

Key findings of this Transportation Planning Rule analysis include the following:

- Comparison of a reasonable “worst-case” trip generation scenarios shows that rezoning of the approximately 15.9-acre parcel from *Industrial Park* to *Industrial Commercial* results in a reduction in the critical weekday p.m. peak hour trip generation potential of the property.
- With a reduction in weekday p.m. peak hour trips the project does not meet ODOT or City of Salem study thresholds of significance at any nearby locations to elevate this analysis to a formal Traffic Impact Analysis. With the reduction in potential trips, a comparative analysis would show that all surrounding intersections and corridors will operate better with the rezone.

Please note that this rezone analysis only supports the modification of the zoning through comparative reasonable build-out scenarios, showing that there are no needed changes to long-range transportation plans at this step in the process. Further transportation materials will be required to support any future development per the requirements within Salem Revised Code Sec. 803.015. These materials will be provided under separate cover when (and if) a specific future redevelopment plan for the property is proposed.

Based on this review a significant effect does not occur with the proposed rezone of the property at 355 Hawthorne Avenue. I can be reached if there are any questions on this analysis at (503) 997-4473 or via email at joe@transightconsulting.com.



March 25, 2026

City of Salem Planning Division

RE: File No. 105541 OO PLN at 355 Hawthorne Ave. SE

Dear city planning staff:

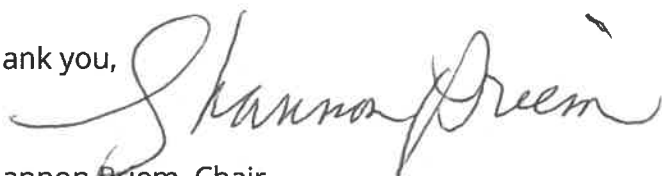
The Southeast Salem Neighborhood Association (SESNA) unanimously supports the proposed change of this 15.9-acre lot from Industrial, to Industrial Commercial, to allow the Salem-Keizer School District to use this property to improve education.

The property, recently purchased from Wells Fargo, was used mainly as a call center. The zone change helps the district expand basic education uses, which isn't permitted under current zoning restrictions.

After hearing a presentation by district staff and their land-use/legal team, SESNA learned the district needs this space for server storage — and teacher training. The change also allows educators to expand alternative education programs, so desperately needed for families, schools and our community.

The zone change maintains the integrity of how surrounding businesses use this area, so very little will change. The change we DO want to see, however, is more capacity to help our schools — and this project accomplishes that.

Thank you,



Shannon Priem, Chair