



Oregon

Theodore R. Kulongoski, Governor

Department of Land Conservation and Development

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NOTICE OF ADOPTED AMENDMENT

May 19, 2008



TO: Subscribers to Notice of Adopted Plan or Land Use Regulation Amendments

FROM: Mara Ulloa, Plan Amendment Program Specialist

SUBJECT: City of Salem Plan Amendment
DLCD File Number 015-08

The Department of Land Conservation and Development (DLCD) received the attached notice of adoption. Copies of the adopted plan amendment are available for review at DLCD offices in Salem, the applicable field office, and at the local government office.

Appeal Procedures*

DLCD ACKNOWLEDGMENT or DEADLINE TO APPEAL: June 3, 2008

This amendment was submitted to DLCD for review prior to adoption with less than the required 45-day notice. Pursuant to ORS 197.830 (2)(b) only persons who participated in the local government proceedings leading to adoption of the amendment are eligible to appeal this decision to the Land Use Board of Appeals (LUBA).

If you wish to appeal, you must file a notice of intent to appeal with the Land Use Board of Appeals (LUBA) no later than 21 days from the date the decision was mailed to you by the local government. If you have questions, check with the local government to determine the appeal deadline. Copies of the notice of intent to appeal must be served upon the local government and others who received written notice of the final decision from the local government. The notice of intent to appeal must be served and filed in the form and manner prescribed by LUBA, (OAR Chapter 661, Division 10). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

***NOTE: THE APPEAL DEADLINE IS BASED UPON THE DATE THE DECISION WAS MAILED BY LOCAL GOVERNMENT. A DECISION MAY HAVE BEEN MAILED TO YOU ON A DIFFERENT DATE THAN IT WAS MAILED TO DLCD. AS A RESULT YOUR APPEAL DEADLINE MAY BE EARLIER THAN THE DATE SPECIFIED ABOVE.**

Cc: Gloria Gardiner, DLCD Urban Planning Specialist
Steve Oulman, DLCD Regional Representative
Bryce Bishop, City Of Salem

<paa> ya

NOTICE OF ADOPTION

DATE
STAMP

DEPT OF
MAY 13 2008
**LAND CONSERVATION
AND DEVELOPMENT**
For DLCD Use Only

THIS FORM MUST BE MAILED TO DLCD
WITHIN 5 WORKING DAYS AFTER THE FINAL DECISION
PER ORS 197.610, OAR CHAPTER 660 - DIVISION 18

Jurisdiction: City of Salem Local File Number: Code Interpretation 08-1
Date of Adoption: May 6, 2008 Date Mailed: May 13, 2008
Date this Notice of Proposed Amendment was mailed to DLCD: April 17, 2008

Comprehensive Plan Text Amendment Comprehensive Plan Map Amendment
 Land Use Regulation Amendment Zoning Map Amendment
 New Land Use Regulation Other: Code Interpretation

Summarize the adopted amendment. Do not use technical terms. Do not write "See Attached."

Applicant initiated formal code interpretation requesting clarification concerning the number of residents and the type of activities and services permitted in "Residential Homes" (SRC 111.190(d)) as opposed to "Residential Care Facilities" (SRC 146.040(m)).

Describe how the adopted amendment differs from the proposed amendment. If it is the same, write "SAME." If you did not give notice of the Proposed Amendment, write "N/A."

Same

Plan Map Changed from: NA to: NA
Zone Map Changed from: NA to: NA
Location: NA Acres Involved: NA
Specify Density: Previous: NA New: NA
Applicable Statewide Planning Goals:

Was an Exception Proposed: YES NO

Did the Department of Land Conservation and Development receive a Notice of Proposed Amendment.....

Forty-five (45) days prior to first evidentiary hearing?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If no, do the statewide planning goals apply?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If no, did Emergency Circumstances require immediate adoption?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Affected State of Federal Agencies, Local Governments or Special Districts:

Local Contact: Bryce Bishop, Interim Senior Planner Phone: (503) 588-6173 Extension: 7599
Address: 555 Liberty Street SE, Room 305 City: Salem
Zip: 97301 E-Mail Address: bbishop@cityofsalem.net

DLCD File No: 015-08 (16883)

ISSUE: Code Interpretation 08-1

DATE OF DECISION: May 6, 2008

APPLICANT: South Central Association of Neighbors (SCAN)

PURPOSE OF REQUEST:

South Central Association of Neighbors (SCAN) applied for a formal code interpretation requesting clarification of the number of residents and the type of activities and services permitted in "Residential Homes" (SRC 111.190(d)) as opposed to "Residential Care Facilities" (SRC 146.040(m)).

ACTION:

The Salem Planning Commission adopted the facts and findings of the staff report and formally adopted the following interpretations:

- 1(a). Residential Home. SRC Chapter 146 (Single Family Residential) allows as a permitted use a single family residence and residential homes. "Residential home" is broadly defined by the SRC and includes a wide variety of activities, including drug and alcohol treatment facilities in a residential environment for five or fewer residents and staff persons in addition to residents. The type of activities and services provided in a residential home is limited such that "medical care" is not a major element of the activity.
- 1(b). Residential Care Facility. Residential homes are essentially the same type of use as residential care facilities except residential homes are limited to five or fewer residents. Therefore, the same type of activities and services that are allowed as a residential home are allowed in a residential care facility, without the limitation on the number of residents, except as specifically limited by the SRC. The SRC limits residential care facilities as conditional uses, not permitted uses in the Single Family Residential zone, which means they may be permitted after review and approval by the City (SRC 146). SRC 146.040(m) further limits residential care facilities and does not allow them to operate as in-patient or out-patient drug or alcohol treatment facilities. However, that restriction is likely a violation of the federal Fair Housing Act (FHA) and Americans with Disabilities Act (ADA).
2. The City of Salem does not require prior approval of a permitted use, however, to construct an improvement a building permit may be required. Building permits are ministerial acts where notice is not provided and the permit is not appealable. In the Single Family Residential zone, outright permitted uses include a single family residence or a residential home on an individual lot. Other uses are classified as "special" or "conditional" uses, and those uses require some form of administrative approval ("limited land use decisions") or require approval only after conducting a hearing and providing notice and comment ("land use decisions").

This model of classification of uses is repeated by practically every city and county in the State of Oregon, and allows property owners to use their property for use that are compatible in the zone where the property sits with minimum involvement by the regulatory authority. Conditional and special uses, such as residential care facilities or fraternal organizations require a heightened degree of review because of the nature of their use. Such uses may be allowed in the zone with conditions on their use so as to mitigate their effects on the neighborhood.

Requiring notice, a comment period, and a hearing for each and every permitted use would be an undue burden for the property owner and prohibitively expensive for the City.

3. Based on analysis of the SRC 146, staff further recommends that the Planning Commission initiate a text amendment to SRC 146 to bring the SRC into conformance with the Fair Housing Act and the Americans with Disabilities Act. The amendment would regulate residential care facilities are regulated the same as any other multi-family residential use, including drug and alcohol rehabilitation facilities.

The Planning Commission's decision is based upon the following facts and findings:

1. **Authority and Purpose of Code Interpretation Process**

Salem Revised Code (SRC) Chapter 110 (General Zoning Provisions), specifically SRC 110.050(a) through (g), establishes the applicable process and requirements for formal interpretations of the zoning code. Under SRC 110.050(a) the Planning Commission may initiate or the Planning Administrator may request initiation of interpretations of the Salem Revised Code. In addition, any individual may also request, upon filing of application, a formal interpretation of the SRC.

The purpose of a formal interpretation is to clarify the intent of the zoning code and its application in particular circumstances. The Planning Commission cannot through its interpretation vary or modify any clear and unambiguous provisions or supplement existing provisions by adding new restrictions, standards, or policies not apparent or necessarily implied within the code itself.

In rendering interpretations, the Planning Commission shall always consider the Salem Area Comprehensive Plan (SACP), where applicable, and shall render no interpretation that is inconsistent with either the SACP's provisions or intent.

In the event that the Planning Commission does not render an interpretation it shall (1) either refer the question to the City Council with an explanation it deems appropriate or (2) recommend to the Council appropriate revisions to the zoning code to either resolve the question or to revise or supplement the policy issue.

2. **Rules of Statutory Interpretation**

SCAN has requested the Planning Commission to make a "formal interpretation" of the Salem Revised Code (SRC) as it relates to "residential homes" and "residential care facilities" in the Single Family Residential (RS) zone. The formal interpretation will result in a final land use decision that is reviewable by City Council and appealable to the Land Use Board of Appeals (LUBA). LUBA and the courts are governed by statutory and case law rules of statutory construction. Statutory and case law rules provide a framework for interpretation of the SRC and should be followed by the Planning Commission in this decision.

Oregon Revised Statutes (ORS) 197.829(1) governs LUBA's jurisdiction over a local government's interpretation of its own zone code or comprehensive plan, and requires that the local government's interpretation be consistent with the land use regulation's express language, purpose and policy.

The three elements of ORS 197.829(1) (*express language, purpose, and policy*) are the same elements that govern state courts when interpreting local and state laws. In the Oregon Supreme Court case PGE v. BOLI, the Court established the standard for statutory interpretation followed by all courts in the state. In summary, statutory construction under PGE v. BOLI begins with the "text and context" of the law under review. If the meaning of the law is clear and unambiguous after review of the text and context of the law, the inquiry ends and no further sources of meaning are investigated.

In analyzing the text of a law, the following tools are used: 1) definitions; 2) rules of grammar; and 3) "rules of construction" (i.e., principles adopted by courts that are used to determine what statutory language means).

In analyzing the context, the specific provision is read in light of 1) other parts of the same section or ordinance; 2) any related ordinances; 3) previous versions of the same ordinance; and 4) the historical circumstances surrounding the original enactment of the ordinance.

If, after analyzing the text and context, the meaning is still ambiguous, the stated or apparent purpose of the ordinance may be examined. This includes the "legislative history." Legislative history includes statements made by the City Council when adopting the language, staff reports, and testimony.

3. Analysis of Salem Revised Code Provisions

A. **Single Family Dwellings, Residential Homes, and Residential Care Facilities in the RS Zone**

i. Text and Context

Within the RS (Single Family Residential) zone, uses are allowed as either Permitted or Special uses or with Administrative Conditional, Specific Conditional, or Conditional Use approval. If a use is not listed under one of these classifications, the use is prohibited within the zone (SRC 146.050). The RS zone, as relevant here, allows "one single family dwelling" and a "residential home" as permitted uses (SRC 146.020(a) & (m)). "Single family residence" is not specifically defined in the SRC, but "**Family**" is defined under SRC 111.070(a) as:

"An individual or two or more persons related by blood or marriage, or a group of not more than five persons (excluding servants) who need not be related by blood or marriage, living together in a dwelling unit. **Family** shall include two or more handicapped persons as defined in the Fair Housing Amendments Act of 1988 living as a single housekeeping unit" (Emphasis in original).

A use that meets the definition of "family" is permitted as a "single family residence." Pursuant to that definition, an unlimited number of related persons, or an unlimited number of handicapped persons may live together in a single dwelling unit, subject only to occupancy limitations established for health and safety reasons. However, if the use of a residence by up to five handicapped persons also includes staff persons, the use is classified as a "residential home."

"**Residential home**" is defined under SRC 111.190(d) to mean:

"A residence for five or fewer unrelated physically handicapped, mentally handicapped, socially dependent, or mentally, emotionally, or behaviorally disturbed individuals and for staff persons in addition to residents who need not be related to each other or to any other home resident."

The definition of "residential home" included within the SRC conforms to the definition established for such a facility found in ORS 197.660(2) except that the state definition specifically references "treatment" or "training." ORS 197.660(2) defines "Residential home" as meaning:

"A residential treatment or training or adult foster home licensed by or under the authority of the department, as defined in ORS 443.400, under ORS 443.400 to 443.825, a residential facility registered under ORS 443.480 to 443.500 or an adult foster home licensed under ORS 443.705 to 443.825 that provides residential care alone or in conjunction with treatment or training or a combination thereof for five or fewer individuals who need not be related. Staff persons required to meet licensing requirements shall not be counted in the number of facility residents, and need not be related to each other or to any resident of the residential home."

Therefore, within the RS zone, any number of related or handicapped persons, but not more than five unrelated, non-handicapped, persons may live together in a dwelling unit as a permitted use. Further, up to five handicapped persons and staff in addition to residents may reside in a single family zone in a "residential home."

If a proposed residential home exceeds five handicapped persons in addition to staff, it would no longer meet the definition of a "residential home," and would instead be classified as a "residential care facility." A "residential care facility" is listed as a Conditional Use within the RS zone pursuant to SRC 146.040(m), with some exceptions:

"Residential care facilities, including homeless shelters serving five or fewer persons (836), except residential homes and other structures housing families of handicapped persons and inpatient or outpatient drug or alcohol treatment facilities."

"Residential care facility" is not specifically defined in the SRC. Instead, the SRC references the Standard Industrial Classification (SIC) Manual, Industry Group 836, which describes "residential care" as:

"Establishments primarily engaged in the provision of residential social and personal care for children, the aged, and special categories of persons with some limits on ability for self-care, but where medical care is not a major element. Included are establishments providing 24-hour year-round care for children. * * * Establishments primarily engaged in providing nursing and health-related personal care are classified in Industry Group 805 [Nursing and Personal Care Facilities]."

As stated above, SRC 146.040(m) lists "residential care facilities" as a conditional uses in the RS zone, but also provides an exception for "residential homes and other structures housing families of handicapped persons and inpatient or outpatient drug or alcohol treatment facilities."

"Residential homes" are listed under SRC 146.020(m) as outright permitted uses and "other structures housing families of handicapped persons" are allowed as outright permitted uses based upon the definition of "family," which includes an unlimited number of handicapped individuals living together. This definition would include alcohol and drug rehabilitation facilities, and any other structure housing up to five handicapped or disabled residents and staff in addition to residents so long as medical care is not a major element of the use. Through the allowance of single family dwellings within the RS zone, residential homes are a permitted use pursuant to SRC 146.020(a).

"Inpatient or outpatient drug or alcohol treatment facilities," however, are not expressly listed as permitted, special, administrative conditional, or specific conditional uses within the zone. Pursuant to SRC 146.050, if a use is not otherwise permitted, it is prohibited. Therefore, pursuant to the plain language of SRC Chapter 146, "single family dwellings" and "residential homes" are outright permitted uses, but "inpatient and outpatient drug or alcohol treatment facilities" are prohibited in the RS zone, because they are not included as permitted uses, and are specifically exempted from the conditional use provisions for residential care facilities.

Residential care facilities are allowed as conditional uses in the single family zone. Residential care facilities include establishments for more than five handicapped or disabled residents and staff persons that meet the description of "residential care facility" as described in the SIC, except for drug and alcohol treatment facilities for more than five residents, and "other structures housing families of handicapped persons."

The exception under SRC 146.040(m) for "other structures housing families of handicapped persons" results in other structures being deemed permitted as single family residential uses, because the definition of "family" in the SRC includes an unlimited number of handicapped persons, which matches the definition of a "related" family.

This "plain text" interpretation, however, prohibits the use of a residential care facility for a drug or alcohol rehabilitation facility. This prohibition likely violates State law, the Fair Housing Act (FHA) and the Americans with Disabilities Act ADA. As discussed in greater detail below, the FHA and ADA prohibit the discrimination in housing on the basis of disability. SRC 146.040(m) allows some types of residential care facilities for some types of disabled persons, but prohibits residential care facilities for persons addicted to drugs or alcohol. That is discrimination based on a disability, which is prohibited.

Under the rules of statutory construction, and as set forth by the Oregon Supreme Court in *PGE v. BOLI*, interpretation of an ordinance ends if the plain text of an ordinance is clear and unambiguous. The interpreter need not analyze the legislative history (i.e., drafter's intent) such as the record from the hearing where the ordinance was adopted. For purposes of analyzing, SRC 146.020 and 146.040, the plain text of the section is clear that residential homes are permitted uses and residential care facilities are conditional uses respectively. The phrase "other structures housing families of handicapped persons and inpatient or outpatient drug or alcohol treatment facilities" of SRC 1436.040(m), however, is not clear.

While the plain text interpretation of the ordinance is controlling, it appears that this construction was not intended when the ordinance was adopted. The following discussion of the legislative history that led to the adoption of the present language is intended to provide context for how the code reached its present form, not as a guide to its interpretation.

ii. Legislative History.

The phrase "other structures housing families of handicapped persons" was added to the exception to conditional uses in 1990 with the express intent, as described in the 1990 staff report, that such uses be allowed as permitted uses in the RS zone (September 18, 1990 Memorandum from Staff to the Planning Commission, p. 2). The phrase, however, was not added to either the definition of residential home, or as a separate permitted use. Pursuant to SRC 146.050, a use that is not listed as a permitted, conditional, or special use is prohibited.

In August 1990, DLCD sent a letter to Oregon cities and counties advising them that the Department of Housing and Urban Development (HUD) had challenged the zoning ordinances of three Salem area jurisdictions under the Fair Housing Act. The DLCD advised that under the Fair Housing Act cities must treat families of handicapped persons the same as families related by blood or marriage. "If a zoning ordinance permits [families related by blood or marriage larger than five individuals to reside in a zone] outright, but restricts handicapped facilities having more than five residents, HUD believes the ordinance would discriminate against handicapped persons" (DLCD letter dated August 16, 1990).

The memorandum (Attachment 2) which accompanied Ordinance 3-91, the ordinance that amended SRC 146 to add the language in question, was clear that the intent was to treat families of handicapped individuals the same as a family related by blood or marriage. The memorandum explains, "The intent of the draft ordinance is to equalize the siting opportunities for traditional families and households of handicapped individuals." The staff report states that the proposed amendments are to continue to treat residential care facilities, such as halfway houses and group homes not housing handicapped individuals as conditional uses, and to specifically exempt from the conditional use requirement "structures housing the handicapped in RS, RA and RD zones."

While the DLCD letter and the city memorandum give evidence of the intent of the code changes, the opinion they state, that families of handicapped individuals must be treated the same as related families, is not entirely accurate. Further, regardless of the intent described by staff, the Ordinance does not match that intent. In fact, state law allows local governments to treat residential homes (defined as five or fewer unrelated individuals) differently from residential care facilities (defined as six to 15 unrelated individuals). Residential homes must be allowed as a permitted use in single-family zones, such as the City's RS zone, while residential care facilities must be allowed in multi-family zones, but may be allowed in single-family zones (See, ORS 197.660 - 197.670).

In 1993, SRC 146 was again amended, this time adding the text related to drug and alcohol treatment facilities as exceptions to the conditional use provisions of 146.060(m). Again, the amendment was made to "except" drug and alcohol treatment facilities from the conditional use provisions, but these uses were not added as permitted uses.

The intent behind these amendments is unclear. The amendments were adopted in response to a LUBA decision in Harmony House, Inc. v. City of Salem, 22 Or LUBA 629 (1992) (Harmony House).

In Harmony House, the applicant requested a code interpretation from the City that a proposed alcohol and drug rehabilitation facility would be permitted in the RS zone. Specifically, the applicant proposed to establish a "short term residential care facility for up to twenty clients and a long term residential care facility for up to fifteen clients." The City Council eventually determined that the proposed use was not a "residential care" facility as defined in the SIC manual, but was rather a "Nursing and Personal Care Facility." The applicant appealed the City's decision to LUBA, and LUBA reversed the City's decision, finding that the level and type of care proposed was more akin to a residential care facility.

In December 1992, after the LUBA decision, the City amended the code (Attachment 3) to reclassify "residential care facilities" and "nursing and personal care facilities" from "special uses" to "conditional uses."

In 1993, the City amended SRC 146 to "reflect the Council's interpretation that inpatient and outpatient drug or alcohol treatment facilities are not special or conditional uses" in a single family residential zone. The amendment, Ordinance No. 25-93 (Attachment 4), added the text, "and inpatient and out patient drug or alcohol treatment facility," to SRC 146.040(m) (Conditional uses), so that it now reads:

"Residential care facilities, including homeless shelters serving five or fewer persons (836), except residential homes and other structures housing families of handicapped persons and inpatient or outpatient drug or alcohol treatment facilities."

Strictly interpreting this section to prohibit all drug and alcohol treatment facilities, regardless of the number of residents, would likely violate state law (ORS 197.670), and the FHA and ADA prohibitions on the disabled. Recovering drug addicts are considered disabled, and prohibiting such a treatment facility in an RS zone, especially for five or fewer individuals, would violate the FHA. The more reasonable interpretation is that "other structures housing families of handicapped persons and inpatient or outpatient drug or alcohol treatment facilities" that have over five handicapped persons (and thus are not residential homes) are not prohibited in the single family zone. This interpretation also follows state law, which, as stated above, allows local governments to permit residential care facilities (i.e., more than five persons) to be permitted in a single family zone, but does not require it.

State law and Federal case law regarding the FHA support this conclusion. State law, as cited above, allows cities to prohibit such facilities in single family zones, so long as they are allowed in multi family zones. Regarding federal law, in Oxford House, Inc. v. City of Edmonds, 514 U.S. 725 (1995), the City of Edmonds defined "family" to restrict groups of handicapped persons to five or fewer. The U.S. Supreme Court, while not directly deciding that the definition violated the FHA, held that the city's definition of family ("persons [without regard to number] related by genetics, adoption, or marriage, or a group of five or fewer [unrelated] persons"), was subject to regulation under the FHA, and required the City of Edmonds to consider a request for reasonable accommodation under the FHA.

In another federal case concerning the FHA, the 8th Circuit Court of Appeals held that an ordinance that limited the number of group home occupants to eight residents did not facially discriminate against the handicapped because the ordinance also capped other types of housing for unrelated individuals and was therefore neutral (Oxford House v. City of St. Louis, 77 F.3d. 249 (8th Cir. 1996)).

Thus SRC 146.040(m), allows residential care facilities as a conditional use in the RS zone, and also allows residential homes and other structures housing five or fewer handicapped persons as well as drug or alcohol treatment facilities with five or fewer persons) as a conditional use. This interpretation would comply with State law, the FHA and ADA.

B. Maximum Five Person Limit for "Residential Homes"

A question has been raised as to whether children of residents of a residential home who also live in the home should count against any cap on the number of residents.

As stated above, the RS zone allows one single family dwelling per lot as a permitted use pursuant to SRC 146.020(a). Unless the use is otherwise allowed as either a permitted, special, administrative conditional, specific conditional, or conditional use, it is prohibited in the RS zone (SRC 146.050). SRC Chapter 111.070(a) defines "family" as:

"An individual or two or more persons related by blood or marriage, or a group of not more than five persons (excluding servants) who need not be related by blood or marriage, living together in a dwelling unit. Family shall include two or more handicapped persons as defined in the Fair Housing Amendments Act of 1988 living as a single housekeeping unit."

If the total number of individuals (including the women and their children) does not exceed five people, the proposed use would be permitted under the Salem Zoning Code. If the proposed use exceeds five unrelated non-handicapped individuals, the use would be prohibited.

In this example, there is no indication that the children are considered handicapped or disabled under federal law. The proposed use would violate the single family zone requirement, to the extent that the children residing at the home will result in a total population over five persons.

Under the Oxford House v. City of Edmonds case, the City would be required to consider a request for reasonable accommodation to allow the children to stay with their mothers. Federal law and HUD have established general guidelines for reasonable accommodation. Such accommodation may be denied if the cost to a local government is unreasonable or prohibitive, or if the requested accommodation would fundamentally alter the zoning scheme.

It is unclear without a specific proposal to determine whether a request for reasonable accommodation could be granted, however, such a request would have to be considered based only on whether it would fundamentally alter the City's zoning scheme, because waiving the single family restriction would likely have no financial cost to the City.

C. Classification of Individuals Recovering from Drug or Alcohol Use as "Disabled"

An argument has been raised that if individuals are "currently addicted" to illegal drugs, they are not considered handicapped or disabled under federal law. FHA defines "handicap" as "(1) a physical or mental impairment which substantially limits one or more of such person's major life activities, (2) a record of having such an impairment, or (3) being regarded as having such an impairment" (42 U.S.C. Section 3607(h)). Drug or alcohol addiction has been determined to be a disability.

Although federal law specifies that individuals that are "currently using" illegal drugs cannot claim handicapped, or disabled status, individuals that are addicted to illegal drugs or alcohol, including those seeking treatment are considered handicapped or disabled (42 U.S.C. Section 3607(h)).

Case Planner: Bryce Bishop, Interim Senior Planner, Ext. 7599, bbishop@cityofsalem.net

Planning Commission Vote:

Yes 6 No 0 Absent 1 (Dorn)

CITY OF *Salem*
AT YOUR SERVICE
COMMUNITY DEVELOPMENT
Planning Division
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