



November 15, 2025

Via email to: d.nilsen@cityofhoodriver.gov, Planning Director

RE: 2025-15 Marriott Hotel Site Plan Review

Testimony for the public hearing December 1, 2025

To the City of Hood River Planning Commission:

Thrive Hood River urges you to reject this site plan application. The proposed development is not compatible with the surrounding area, and it will create a significant parking problem that is inconsistent with the Comprehensive Plan.

A. COMPATIBILITY

The proposed structure would have 130,971 square feet of Gross Building Area¹. For perspective, this is almost three times the size of the Big 7 building at 616 Industrial Street. It would have 8 levels² and tower over every surrounding property. The plans include 135 guest rooms, a bar, two restaurants, a meeting center, and a spa with pools. The lower drawing at Attachment B shows the size of this project. The upper drawing appears to be an early version of the structure, but is still useful for a sense of the change relative to the existing structure. The site is bordered on two sides by the Downtown Historic District (Attachment A).

The City code, HRMC 17.16.040 H. Decision Criteria for Site Plan Review, requires compatibility, as follows:

The height, bulk, and scale of buildings shall be compatible with the site and buildings in the surrounding area.

The application does not satisfy four of the five mandatory compatibility criteria.

Written comments for this rescheduled December 1 hearing are due before the updated staff report is available to the public. Consequently, references in this letter are to the materials made available for the hearing originally scheduled for August 18, except for Attachment E.

1. <https://cityofhoodriver.gov/wp-content/uploads/Meetings/Application-Materials.pdf>, page 298.
2. The eight levels are (ibid. pages 298-306):
 - * Lower, basement level with a restaurant, fitness room, employee lounge, offices and laundry;
 - * Levels 1-6 with guest room, meeting rooms, bar, restaurants, spa and several outdoor decks;
 - * rooftop level with both hotel guest and public deck areas.

1. Height (City Staff Report to the Planning Commission, page 3-4)

The proposal does not meet City code and sets an inappropriate precedent for building height.

HRMC 17.03.050 G. 3. requires that “No commercial structure shall exceed a height of forty-five (45) feet.” HRMC 17.01.060 defines height as “a vertical distance above a reference datum measured to the highest point of a building.”

There are two options for the reference datum. The first option applies when the highest ground surface along the building exterior is ten feet or less above the lowest ground surface, which is not the case here. When the ground surface at the highest point is more than ten feet above the lowest grade, option two defines the reference datum as “An elevation ten (10) feet higher than the lowest grade”.³

In short, building height is limited to 45 feet above the reference datum, which is itself 10 feet higher than the lowest grade along the length of the structure.

The applicant appropriately uses option two because of the grade increase on the site, *but then resets "the lowest grade" for each new terrace. Nothing in the code allows that. The code defines a reference datum for a building at an elevation ten feet higher than the lowest grade, implying that the lowest original grade can be stepped up ten feet only once.* Attachment D shows how the reference elevation was reset three times to get the number of floors the applicant wants. Attachment E shows that the rooftop level, with its public decks, is 69 feet above the reference datum, 153% of the maximum allowed.

The City staff report (page 3) questions this approach:

"Although the project utilizes a terracing approach to accommodate grade changes that exceed 50 feet across the site, it is not clear that this methodology and terraced height reset comply with regulations that *require the measurement to initiate at the lowest original grade.* This issue is impactful to sloped sites such as those for the subject site and those generally south of State Street and south of Sherman."

3. The exact text of HRMC 17.01.060 follows.

BUILDING HEIGHT means a vertical distance above a reference datum measured to the highest point of a building. The reference datum shall be selected by either of the following, whatever yields the greater building height:

1. The elevation of the highest adjoining sidewalk or upper ground surface within a five (5) foot horizontal distance of the exterior wall of the building when such sidewalk or ground surface is not more than ten (10) feet above the lowest grade.
2. An elevation ten (10) feet higher than the lowest grade when the sidewalk or ground surface described in item one (1) above is more than ten (10) feet above *the lowest grade.* The height of a stepped or terraced building is the maximum height of any segment of the building.

That last sentence warns of the precedent that Marriott's method would create by allowing developers to endlessly reset the reference datum. If the Planning Commission allows this approach, there is effectively no limit to the height of commercial buildings downtown. To a person standing at the lowest point, the highest point of the Marriott complex would tower nearly 80 feet above, and the Marriott site is relatively flat compared to several other parcels in the downtown business area.

2. Bulk (City Staff Report to the Planning Commission, page 18, paragraph 3)

In 2001, Walmart submitted a site plan review application to Hood River County for a 186,685 square-foot, one-story structure. In 2003, the County Planning Commission approved the application. The City was one of three parties who appealed the decision to the County Board of Commissioners, which reversed the Planning Commission decision and denied the application. The denial was appealed to the Oregon Land Use Board of Appeals (LUBA), which upheld the County's interpretation of compatibility requirements and the denial of the application.⁴ The City joined the LUBA case as an intervenor-respondent, defending the County's interpretation of the County compatibility standard. *The County compatibility code was identical to the City code*, then and now: "The height, bulk, and scale of buildings shall be compatible with the site and buildings in the surrounding area."

In the Walmart case, the county defined bulk as enclosed cubic feet. It seems disingenuous for the City to create an interpretation of bulk that differs from the Walmart case which they defended to LUBA, but that is what's happening. The staff report for this project defined bulk as the *ratio of the square footage of the building to the square footage of the site*, deriving a 2:1 ratio. By that measure, any two-story structure which covers all the available ground has the same bulk as this proposed building. This "relative-to-something-else approach" is not a reasonable interpretation. Attachment C shows two nearby buildings on Oak Street which have a 2:1 ratio, but would never be perceived as having the same bulk as the proposed project.

3. Scale (City Staff Report to the Planning Commission, page 18, paragraph 1)

The staff report interprets scale as the footprint of the building, which seems reasonable.

4. Compatibility with Site (City Staff Report to the Planning Commission, page 17-18)

The staff report does not define or address this mandatory decision criteria.

4. LUBA 2004-021, *Wal-Mart Stores, Inc. vs. Hood River County*

5. Compatibility with Buildings in the Surrounding Area (City Staff Report to the Planning Commission, page 17-18)

The surrounding area is not defined in the staff report, and this required criteria is not addressed.

In the Walmart case, the County defined the surrounding area as all commercially zoned property from the existing Walmart store at 2700 Wasco Street west to the subject tract on Country Club Road and north along Westcliff Drive. LUBA pointed out that:

“Intervenor-respondent City of Hood River (the city) argued that the county compatibility standard, which is based on an identical city standard, requires the county to determine that the proposed 186,685-foot structure is compatible in size with other buildings in the area. The city pointed out that the largest existing commercial use in the area is the existing 72,000-square foot Walmart store to the east of the subject property.” (LUBA 2004-021, page 4)

In short, the City argued that the proposed Walmart was incompatible with buildings in the surrounding area by referring to the existing store three-quarters of a mile distant. This proposed development physically abuts the Hood River Downtown Historic District on two sides. The proposed structure would overshadow every historic property and dwarf all existing buildings in the Downtown Business district. Given the City’s position in the Walmart case, it seems legally indefensible for the City to deem this project compatible with the size of buildings in the immediate area, let alone any larger surrounding area.

B. PARKING

The application explains that the proposed building requires a *minimum* of 183 parking spaces but includes only 115, and a fee will be paid for the *minimum* 63 parking spaces the project is short⁵. Although HRMC 17.03.050 H.1.f. allows a fee in lieu of parking, we are concerned that accepting a deficit of this unprecedented scale will create issues that cannot be resolved.

HRMC 17.09.100 requires that “For any application to be approved, it shall be established that the proposal conforms to the City Comprehensive Plan”. In that Plan:

- a. Goal 9, Economy, encompasses Goal 5, to “ensure provisions of adequate public facilities in association with development”.
- b. Goal 11, Public Facilities and Services, includes Policy 7, to “Ensure that public facilities and services of adequate size are constructed to serve planned urban uses as urban growth occurs consistent with the zoning.”

Contrary to the Comprehensive Plan, adequate public parking is not being provided in association with the development nor as this urban growth occurs.

5. <https://cityofhoodriver.gov/wp-content/uploads/Meetings/Application-Materials.pdf>, page 352.

The fees in lieu of 63 parking spaces are intended to fund future construction of a parking lot or garage. But that is not slated for the near future, nor even a responsible “someday” expectation, for several reasons.

1. Our understanding is that the City has not identified any feasible site downtown for a parking lot or garage. There is no suitable vacant land in the downtown district, so any project would also entail acquiring, and then demolishing, existing structures.
2. HRMC 17.24.010 specifies that “The amount of the in-lieu fee shall take into account the current costs of land acquisition, financing and construction”. The City does not allow the fee to include the cost of demolishing existing buildings. More importantly, the City does not allow the fee amount to be calculated to provide for inflation. Fees based on current costs will be a minuscule share of the actual costs at a unknown future date, given the dramatic and expected ongoing escalation in land and construction costs.
3. We are not aware that the City has identified other sources to fully fund a future parking garage.
4. Any parking site beyond, say, displacing the County offices at 601 State Street would not be used by guests lugging suitcases to this hotel – they will simply circle their cars endlessly, looking for an opening at the library.

Approving a project with this scale of unresolved parking and traffic issues simply isn’t prudent, and is not in keeping with the vision in Hood River’s comprehensive plan.

C. CONCLUSION

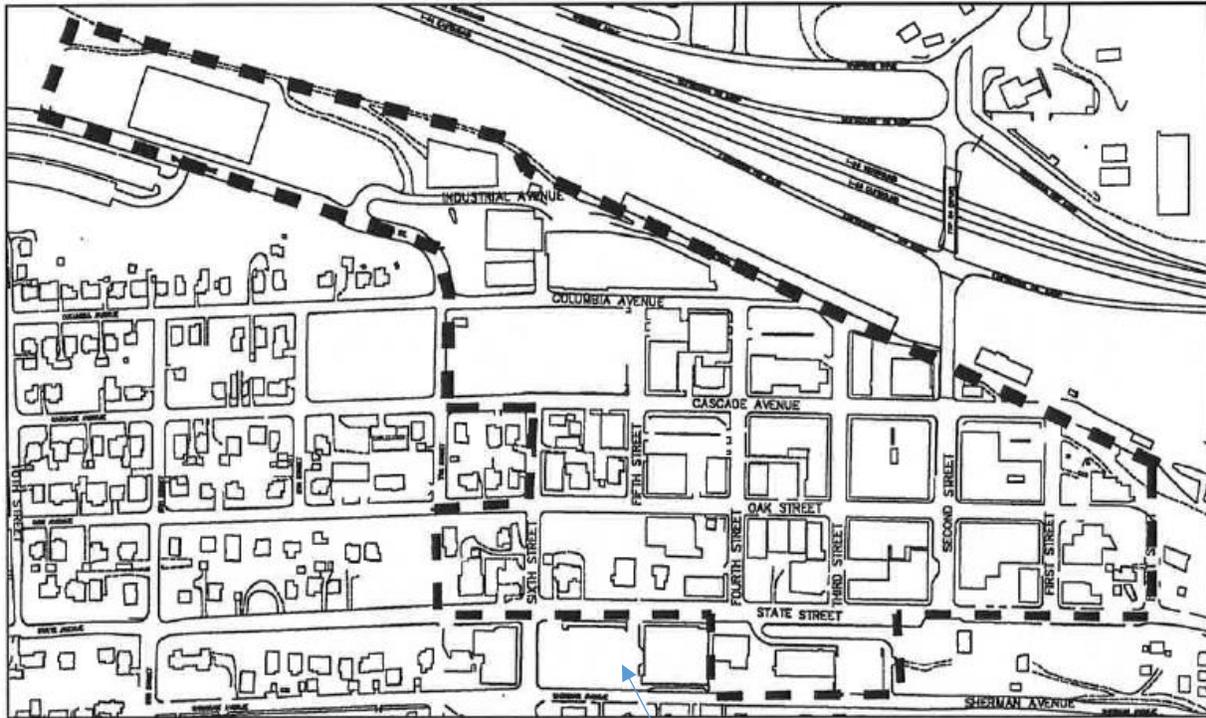
Thrive Hood River is not inherently opposed to additional hotels. A development of this scope and scale, however, is completely inappropriate for downtown Hood River. We urge you to deny this application.

Respectfully,



Chris Robuck, Co-President
Thrive Hood River

ATTACHMENT A - Hood River local downtown historic district



Key:  District boundary

subject property

Source: <https://cityofhoodriver.gov/wp-content/uploads/bsk-pdf-manager/2019/04/Design-Guidelines-for-Local-Historic-District.pdf>, page 3

ATTACHMENT B – building change and size



Source:
Top: <https://cityofhoodriver.gov/wp-content/uploads/Meetings/Application-Materials.pdf>,
page 473.
Bottom: <https://cityofhoodriver.gov/wp-content/uploads/Meetings/Application-Materials.pdf>,
page 339.

ATTACHMENT C – existing buildings with 2:1 building square feet to site square feet ratio

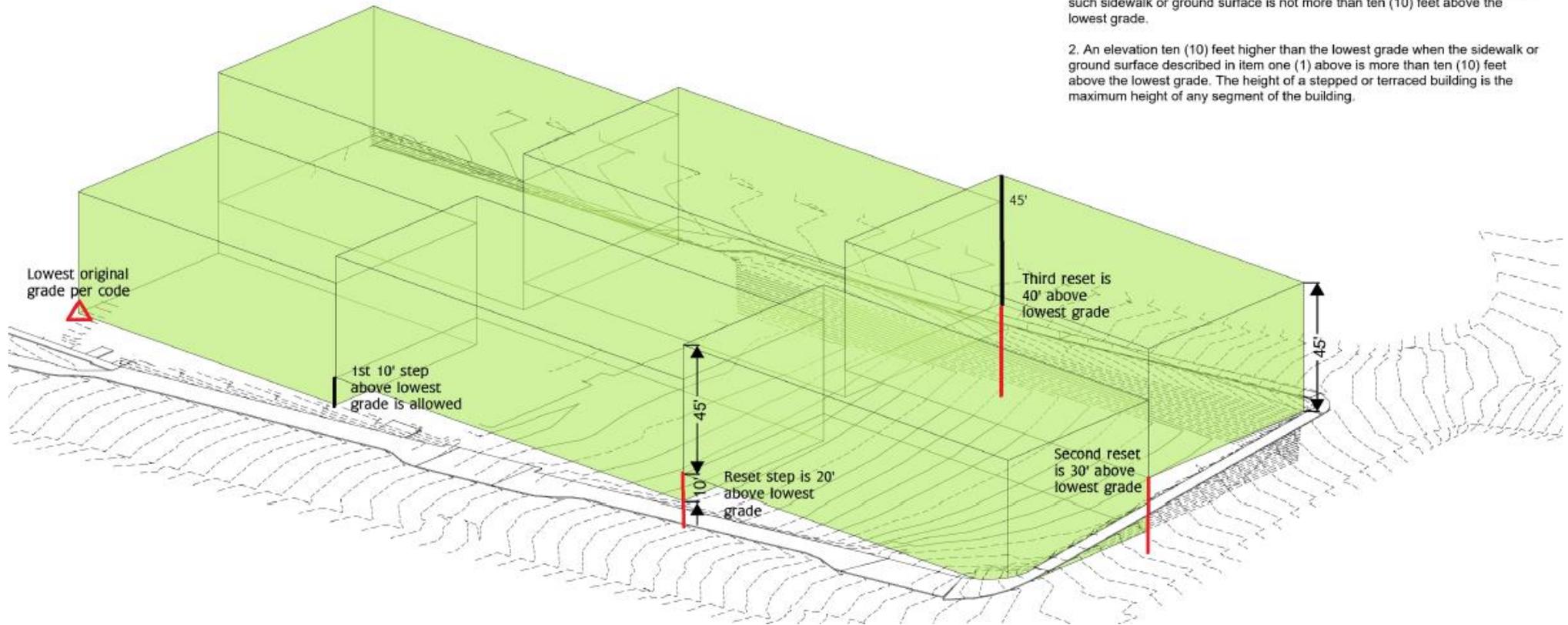


ATTACHMENT D – repeated reset of lowest grade

Hood River Municipal Code 17.01.060 Definitions.

BUILDING HEIGHT means a vertical distance above a reference datum measured to the highest point of a building. The reference datum shall be selected by either of the following, whatever yields the greater building height:

1. The elevation of the highest adjoining sidewalk or upper ground surface within a five (5) foot horizontal distance of the exterior wall of the building when such sidewalk or ground surface is not more than ten (10) feet above the lowest grade.
2. An elevation ten (10) feet higher than the lowest grade when the sidewalk or ground surface described in item one (1) above is more than ten (10) feet above the lowest grade. The height of a stepped or terraced building is the maximum height of any segment of the building.



ATTACHMENT E – final height 69 feet above reference datum



Heights

- 1 Lower, basement level. Lowest grade.
- 2 Level one, 10' above lowest grade. This is the reference datum.
- 3 Level two, 17' 9" above reference datum.
- 4 Level three, 29' 9" above reference datum.
- 5 Level four, 39' 10 3/8" above reference datum.
- 6 Level five, 49' 11 3/4" above reference datum.
- 7 Level six, 60' 1 1/8" above reference datum.
- 8 Rooftop level, 69' 1 1/8" above reference datum, which is 79' 1 1/8" above the lowest grade.

Source: Architectural Preliminary Plan Set in materials dated November 8, 2025, page 9