

Grace Peck Terrace

REFERENCE: EA 21-087458 DA
EA 21-087454 PC
LU 21-21-111639 HRM AD

TYPE III DESIGN REVIEW

NARRATIVE
December 07, 2021

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HOLST ARCHITECTURE

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I. APPLICATION REQUEST

Applicant: Home Forward

Architect: Mark Schmidt
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Location: 1839 NE 14th Ave.

Legal Description: HOLLADAYS ADD, BLOCK 258, LOT 5, S 40' OF LOT 6
HOLLADAYS ADD, BLOCK 258, N 10' OF LOT 6
HOLLADAYS ADD, BLOCK 258, LOT 7
HOLLADAYS ADD, BLOCK 258, LOT 8
HOLLADAYS ADD, BLOCK 258, LOT 1&2 TL 8800

State ID: 1N1E26CD 9200, 1N1E26CD 9300, 1N1E26CD 9400,
1N1E26CD 9500, 1N1E26CD 8800

Property ID: R182582, R182583, R182584, R182585
R182578

Site Size: 23,433 SF [0.54 ACRES)

Zoning: RM3d (Residential Multi Dwelling 3 w/ Design Overlay)

Plan District: N/A

Historic District: Irvington Historic District (Non-Contributing)

Neighborhood: Irvington Community Association

EXISTING CONDITIONS:

Grace Peck Terrace is an aging public housing facility in need of a major capital investment. Originally constructed in 1979, this non-contributing structure is situated amongst residential homes with horizontal lap siding and small- to mid-scale, multi-family buildings with lap siding, brick and stucco in the Historic Irvington district. The existing building is a six-story, two-winged design with double-loaded corridors, 95 one-bedroom units and a ground-level community room, kitchen, and associated support spaces. The existing building structure consists of pre-cast hollow core plank floors supported by reinforced masonry bearing/shear walls. The existing façade includes horizontal banded windows with some unit balconies and a stucco finish wrapping the façade, typical of this time.

The existing exterior skin, primarily stucco and exposed CMU, remain unchanged from the original 1979 construction. Stucco of this age is notorious in the Pacific Northwest for water damage and a primary cause of premature degradation of building elements.

PROPOSAL:

This proposal includes site changes that include new and improved exterior pedestrian circulation, accessibility upgrades, new landscaping, outdoor area, required screening, and improvements to existing parking area. The focus of the design team was to identify and provide accessible and usable outdoor common space that better the experience for the residents and provide on balance a better relationship to the site. Existing outdoor patio and associated retaining wall at northwest corner of site is too small to be usable by residents, does not have sufficient visibility from the interior for safety, and the relationship to ground floor amenity spaces are not supportive. This proposal, include a new exterior terrace and planting buffer adjacent to the first-floor community room. As a result, this new space provides an activation of the ground floor by increasing visibility and creating a new relationship between the building and the site.

This proposal also includes renovations to the building entry sequence. The primary focus of the design team has been to eliminate visual barriers at the entry, reduce visual clutter, and create a new inviting sequence that is appropriate to our northwest climate. The primary cause of visual obstruction is a non-structural wing wall floating outside the exterior façade at the building entry. This wing wall reduces visibility from both inside and outside the building, serves no purpose other than being ornamental and provides no weather protection. This project proposes to remove the existing wing wall and provide a new canopy at the building entry for visual identification and weather protection.

The exterior of the building will receive a full envelope replacement, including replacement of all the stucco siding, which has been confirmed to have water intrusion, leading to maintenance implications and a risk to public health. The context of the surrounding Irvington District is that of historic craftsmen single family homes with horizontal lap siding, historic multi-family dwellings with full dimension brick and stucco facades, and other non-contributing structures of various exterior materials.

Full dimension brick is not a feasible material for this proposal due to the structural limitations of the existing structure, and stucco has historically posed durability and leakage concerns, specifically on this building. As a result, the proposed design employs a primary exterior cladding material of Oko Skin, with small accents of composite metal panel where color accents occur. Oko Skin, when installed horizontally, provides a material that evokes a relationship to horizontal

lap siding. Additionally, the product provides a varied surface quality that mimics the natural variation of brick facades. The use of these quality materials, over insulation and a rainscreen system, create a surface cladding that is both appropriate for the neighborhood context and serves the needs of the building.

Existing vinyl windows are to be removed and replaced with new, improved VPI vinyl windows with horizontal sliders, due to identified leaks and maintenance issues. Window openings are to be modified to maximize daylight into units, while optimizing visual privacy by maintaining similar sill heights.

Plan changes on the interior of the building include improvements to the design and layout of the community room, kitchen and property management offices at the ground level and HVAC upgrades. These changes do not fall under the review of the historic commission other than the relationship between the community room and the proposed new north terrace.

Proposed scope of work under historic review at Grace Peck Terrace includes:

1. New exterior skin including added insulation and OkoSkin cladding
2. Replacement of all windows with VPI vinyl windows
3. Replacement of roofing
4. New HVAC equipment
5. Parking lot and site – non-conforming upgrades and accessibility upgrades
6. Replacement of existing balcony railings
7. Replacement of all storefront and entry glazing
8. Removal of non-structural wing walls and new proposed canopies at front and rear entries

PREVIOUS LAND USE HISTORY:

LU 15-231056 HR Withdrawn Historic Resource Review to remove and replace 3 antennas (1 per sector) and replace with new models (1 per sector. Remove 6 coax cables and replace with 3 hybrid cables. Relocate one sector from flush mount against the building to rooftop to match the other two sectors.

LUR 99-00984 CU DZ Historic Resource Review and Conditional Use Review approval for the addition of 9 radio antennas to the walls and roof of the building: 3 on the south elevation; 3 on the east elevation; and 3 on the roof close to the north façade.

PC 4164 Zone change. No further information is available.

VZ 039-72 No information is available.

II. APPLICABLE DESIGN STANDARDS

Residential Multi-Dwelling 3 (RM3) zone.

The RM3 zone is a medium to high density multi-dwelling zone applied near the Central City, and in centers, station areas, and along civic corridors that are served by frequent transit and are close to commercial services. It is intended for compact, urban development with a high percentage of building coverage and a strong building orientation to the pedestrian environment of streets. This zone is intended for areas where the established residential character includes landscaped front setbacks. Allowed housing is characterized by mid-rise buildings up to six stories tall. The Design overlay zone is applied to this zone.

33.120.100 Primary Uses

Uses allowed in the Multi-Dwelling Zones are listed in Table 120-1.

Proposed: Per Table 120-1, Household Living use is allowed outright in the RM3 zone.
The criterion is met.

33.120.200 Housing Types Allowed

The types of housing allowed in the multi-dwelling zones are stated in Table 120-2.

Proposed: Per Table 120-2, Multi-Dwelling housing type is allowed outright in the RM3 zone.
The criterion is met.

33.120.205 Minimum Required Site Frontage for Development

Ownership of multiple lots and lots of record. Where more than one abutting lot or lot of record is in the same ownership, the ownership may be separated as follows:

1. If all requirements of this Title will be met after the separation, including lot dimensions, minimum density, and parking, the ownership may be separated.

Proposed: Existing lots of record and existing development comply with item 1.
The criterion is met

33.120.205 Minimum Required Site Frontage for Development

The project site is not included on Map 120-2, therefore this standard is not applicable to this project.

33.120.210-211 Floor Area Ratio

Base: 2:1 (46,866 sf)
Bonus: 2:1 (46,866 sf with deeper housing affordability bonus option)
Total Max: 4:1 (93,732 sf)

Proposed: 3.04:1 (71,170 sf)

33.120.212 Maximum Density

This standard is not applicable to this project

33.120.213 Minimum Density

Minimum: RM3d: 1 unit per 1,000 sf of site area (24 units)

Proposed: 4.1 units per 1,000 sf (95 existing units)

33.120.215 Building Height

Allowed: Base: 65'

Bonus: Base +10' (with deeper housing affordability bonus option)

Total: 75'

Proposed: 50'-8"

33.120.220 Setbacks

Minimum: Front: 10'
Side and rear: 5'

Maximum: Front: 20'
Side and rear: 20'

Proposed: Existing front, rear, and side setbacks are conforming

33.120.225 Building Coverage

Maximum: RM3: 85%

Proposed: 50% (11,763 sf/ 23,433 sf)

33.120.230 Building Length and Façade Articulation

Maximum building length: Not a requirement for RM3 zone. Standard not applicable.

Façade Articulation: More than 25% of street-facing facades within 20' of street lot lines are dividing into façade planes off-set by more than 2' (at all balconies as well as at south façade). Reference exhibit C.12-15

33.120.231 Main Entrances

Required: Main entry must be within 8' of the longest street facing façade and (1) face the street

Proposed: Existing building main entrance is conforming. See exhibit C.4

33.120.232 Street Facing Facades

Required: @ Windows: At least 15% of area of each façade that faces a street lot line must be windows or main entrance doors.

@Ground floor windows: No commercial use, therefore standard is not applicable, per discussion with Art Graves (City Planner) on 11.30.2021.

Proposed: Existing street-facing facades are conforming. See exhibit C.12-C.15

33.120.235 Landscaped Areas

Minimum: Per table 120-3, 15% (3,665 SF) of site area (23,433 SF) per at least L1 standards.

Additional landscaping standards:

Building Setbacks: at least the L1 standard of Chapter 33.248

Parking areas: Perimeter and internal parking area landscaping standards are stated in Chapter 33.266, Parking And Loading.

Proposed: Minimum 18% (4,221 SF) of at least L1; Reference C.33
 Building setbacks meet L1 standard. See C.33
 Parking Areas: Reference section 33.248.020 Landscaping and Screening

33.120.237 Trees

Requirements for street trees and for on-site tree preservation, protection, and overall tree density are specified in Title 11. See Chapter 11.50, Trees in Development Situations. See drawing C.33 & C.36

33.120.240 Required Outdoor Areas

Not required to meet the requirements of Outdoor Areas as project is not taking existing outdoor areas further out of compliance, per a discussion with Art Graves (City Planner) on 11.23.2021.

33.120.250 Screening

Required: Exterior garbage and recycling collection areas, mechanical equipment located on the ground, and other exterior storage and exterior display

Proposed: Garbage and recycling is inside the building. Exterior, on-grade mechanical meets F2 Standards. Reference C.4

33.120.255 Pedestrian standards

The pedestrian standards encourage a safe, attractive, and usable pedestrian circulation system. They ensure direct pedestrian connection between the street and buildings on the site, and between buildings and other activities within the site. On-site pedestrian circulation system must meet all standards of this subsection.

Required: Sites with more than one street frontage: 1 main entrance connected to street no more than longer or 120% of the straight-line distance. An additional connection is required between at each of the other streets and a pedestrian entrance.

Proposal: The existing main building entry is located at NE corner and adjacent to 14th Ave. The entry is located within 40 feet of the street lot line and is directly connected to adjacent sidewalks. The building entry provides a straight line access and therefore does not exceed 120% of the distance (or 20' longer than noted straight line distance). Please reference straight line distance as noted on sheet C.5.

Additional existing non straight-line connections are provided for building entries adjacent to NE Hancock St. and NE Schuyler St.

The criterion is met

33.120.270 Alternative Development Options

Not applicable to this project

33.120.275 Development Standards for Institutions

Not applicable to this project

33.120.280 Detached Accessory Structures

Not applicable to this project

33.120.283 Garages

Not applicable to this project

33.120.285 Fences

Requirement: Fences in the side or rear building setbacks allowed up to 8' high that abut a pedestrian connection are allowed if pedestrian connection is part of a ROW that is at least 30 feet wide.

Proposed: New wood fence at rear setback is conforming. Reference C.38-39

33.120.290 Demolitions

Not applicable to this project.

33.120.300 Nonconforming Development

Required: Existing developments that do not conform to the development standards of this chapter may be subject to the regulations of Chapter 33.258, Nonconforming Situations

Proposal: The proposed work will meet the requirements of 33.258.070 Nonconforming Development for all required items except for parking area landscape screening.

The criterion is NOT met, MODIFICATION REQUESTED. SEE SECTION III

33.120.305 Parking and Loading

See Parking and Loading Standards Chapter 33.266 below.

33.120.310 Signs

The sign regulations are stated in Title 32, Signs and Regulations.

Proposal

Signage will be included as a separate permit. Signs for the building will include a project sign and address signage. However, it is intended to be compatible with the style of the building, scale of signage in the neighborhood and meet all requirements of this section.

33.120.330 Inclusionary Housing

See inclusionary housing standards Chapter 33.245 below.

33.120.330 Street and Pedestrian Connections

Project does not meet the threshold for large site pedestrian connectivity as it is less than 5 acres. Additional requirements for street and pedestrian/bicycle connections are regulated by the Bureau of Transportation. See section 17.88.040, Through Streets, of the Portland City Code.

33.245 Inclusionary Zoning

Outside Central City and Gateway Plan Districts, affordable dwelling units must be provided per required rates: 8% of units at 60% median income, 15% of units at 80% median income, or calculated method

Proposed: This project includes existing 100% on-site affordable dwelling units; therefore, this requirement will be met.

33.266.110 Minimum Required Parking Spaces

Per Chapter 33.266.110.D, Exceptions to the minimum number of parking spaces:

Affordable housing exceptions. The minimum number of required parking spaces may be reduced to zero when the applicant demonstrates compliance with the on-site or off-site affordable dwelling unit requirements of Chapter 33.245, Inclusionary Housing, the on-site or off-site affordable dwelling unit requirements of an applicable voluntary inclusionary housing bonus, or the requirements of the deeper housing affordability bonus of Section 33.120.211

Proposed: The proposed design includes 11 existing parking stalls, including (2) accessible stalls, thus exceeding the minimum standards with affordable housing exception.

33.266.110 Maximum Allowed Parking Spaces

Limiting the number of spaces allowed promotes efficient use of land, enhances urban form, encourages use of alternative modes of transportation, provides for better pedestrian movement, and protects air and water quality.

Tables 266-2 Standard B indicates the maximum number of parking spaces allowed based on use in the RM3 zone. Household: none

Maximum: None

Provided: 11

33.266.120 Development Standards for Houses, Duplexes, Triplexes, and Fourplexes

Not applicable to this project.

33.266.130 Development Standards for All Other Development

Below, the applicable standards of this section are addressed, individually, as they apply to the parking provided:

G. Parking Area Setbacks and Landscaping

Perimeter landscaping required at surface parking areas abutting a lot line.

Required: Minimum 5 ft. Of L3 (Per table 266-5, at lot line abutting R zone)

Proposal

MODIFICATION REQUESTED. SEE SECTION III

Existing parking area does not currently meet this standard. The western lot line that abuts an R zone is required to be 5' of L3 screening. Due to an existing site wall, the dimension provided are less than required. Our proposal includes leaving the existing site wall in place. If the project were to bring this component into conformance, it would as a result, cause the remaining existing parking area to be out of conformance.

Reference C.33 for additional parking area landscaping.

33.266.14 Stacked Parking Areas

Not applicable to this project.

33.266.150 Vehicles in Residential Zones

Existing vehicle parking meets the standards of this section.

33.266.200 Minimum Required Bicycle Parking

Required long term: 1 per 8 dwelling units per table 266-6 Standard A, elderly and disabled housing (12) + (2) office = (14) total

Provided long term: (14); Reference C.4

Required short term: 1 per 20 dwelling units (5)

Provided short term: (6); Reference C.4 & C.26

33.266.310 Loading Standards

Buildings with any amount of net building area in Household Living and with less than 20,000 square feet of floor area in uses other than Household Living must have: One loading space meeting Standard B is required where there are more than 40 dwelling units in the building and the site abuts a street that is not a streetcar alignment or light rail alignment

Proposal

One Standard B loading spaces is being provided in the parking area. Loading space to meet all dimensional requirements of this section. Reference C.4.

33.248.020 Landscaping and Screening

B. L2, low screen

Proposal

The parking area contains L2 screening at the southern edge along NE Schuyler St.

C. L3, high screen

Proposal

The parking area contains a tall hedge of existing arborvitae evergreen (shrubs) that are proposed to remain along the west side of the parking lot and property line abutting an 'R' zone. See C.33.

MODIFICATION REQUESTED. SEE SECTION III

33.248.030 Plant Materials

Ground cover, trees and shrubs shall meet standards of this section.

Proposal

Reference landscape drawings C.33-C.36.

33.248.030 Installation and Maintenance

Installation, maintenance, and irrigation shall meet the standards of this section.

Proposal

C.2. Option 2. An irrigation system designed and certified by a licensed landscape architect as part of the landscape plan will be provided.

DESIGN REVIEW OVERLAY – Chapter 33.420

33.420.051 Design Guidelines

Guidelines specific to a design district have been adopted. All other areas within a Design Overlay Zone use the Community Design Guidelines.

Proposal

The project site is not in a design district. See below for proposal on how the project meets the Community Design Guidelines.

HISTORIC RESOURCE REVIEW – Chapter 33.846

33.846.060 Historic Resource Review

The project is not within a community plan district yet is designated in a design overlay zone. Per Table 846-3, the project meets the threshold for a Type III procedure.

33.846.060.E Approval criteria outside the Central City Plan District

1.B Historic District without District specific guidelines. Where there are no guidelines that are specific to the Historic District, the Criteria in Section 33.846.060 G are the approval criteria.

33.846.060.G Other Approval Criteria

Requests for historic resource review will be approved if the review body finds that the applicant has shown that all the applicable approval criteria have been met. The approval criteria are:

Historic Context

Guideline: The historic character of the property will be retained and preserved. Removal of historic materials or alteration of features and spaces that contribute to the property's historic significance will be avoided.

Grace Peck Terrace is a non-contributing resource. Constructed in 1979, there are no historic materials, features, or spaces that contribute to the historic significance. However, the project aims to retain specific qualities and elements that better help the project intertwine with the Irvington Historic district such as retaining and reinforcing strong building massing and style of its era and retaining balconies at units, where existing.

Record of its time

Guideline: The historic resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided.

Grace Peck Terrace is a non-contributing resource, however as noted in the historic context approval criteria, the project aims to retain and reinforce its strong building massing and style of its time. The project does not propose to modify the massing, but rather through the thoughtful use of complimentary materials, new glazing, and reinforced entry sequencing, the project builds upon and supports the overall massing.

Historic Changes

Guideline: Most properties change over time. Those changes that have acquired historic significance will be preserved.

Grace Peck Terrace is a noncontributing resource. There are no changes over time that have acquired historic significance.

Historic Features

Guideline: Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and other visual qualities and, where practical, in materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence.

As a non-contributing resource, there are no historic features to repair. However, as noted prior, the project is proposing an emphasis on replacing unit balconies to retain the residential feel and façade articulation they provide. The existing balconies and balcony railings are in dire need of replacement due to degradation over times from water intrusion and general weathering from our northwest climate. The proposal includes a more cohesive material palette to tie in with the overall façade and provides an opportunity to emphasize and draw attention to the moments where balconies occur.

Historic Materials

Guideline: Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used.

As a non-contributing resource, proposal does not include historic materials. The proposal does include new cladding that is of high quality and permanence and provides visual cues that connect the building to the surrounding historic district.

Archaeological resources

Guideline: Significant archaeological resources affected by a proposal will be protected and preserved to the extent practical. When such resources are disturbed, mitigation measures will be undertaken.

No archaeological resources are present at the site.

Differentiate new from old

Guideline: New additions, exterior alterations, or related new construction will not destroy historic materials that characterize a property. New work will be differentiated from the old.

As a non-contributing resource, no historic materials will be destroyed that characterize the property. The proposal includes removal of all existing façade material and replacing with all new cladding. Cladding proposal includes the primary façade material of Oko Skin (glass fiber reinforced concrete panels), in “light” and “dark” tones to highlight building massings. Subsequent materials include composite metal panel to highlight and frame window openings and balconies. New residential vinyl windows and new ground floor storefront are also proposed.

Architectural compatibility

Guideline: New additions, exterior alterations, or related new construction will be compatible with the resource's massing, size, scale, and architectural features. When retrofitting buildings or sites to improve accessibility for persons with disabilities, design solutions will not compromise the architectural integrity of the historic resource.

As a non-contributing resource, the exterior alterations will not compromise any historic resource.

Preserve the form and integrity of historic resources

Guideline: New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic resource and its environment would be unimpaired.

As a non-contributing resource, no historic resource will be unimpaired. The goal of this proposal is to further strengthen the relationship between this non-contributing resource and the historic district.

Hierarchy of compatibility

Guideline: Exterior alterations and additions will be designed to be compatible primarily with the original resource, secondarily with adjacent properties, and finally, if located within a Historic or Conservation District, with the rest of the district. Where practical, compatibility will be pursued on all three levels.

Compatibility of the original resource does not apply to this proposal as this is a non-contributing resource. However, as a system of hierarchy, the proposal includes a scope of work that has at its highest importance, compatibility with the adjacent properties and surrounding historic district.

This is achieved first, by the material composition of the cladding. Existing materials do not resonate with the residential quality of the surrounding historic context. The existing materials create a large wall of bland and bleak materials. While interesting from a massing perspective, these materials offer nothing in return for visual stimulation. The proposed new cladding materials create a new relationship that evoke the qualities and context of neighboring properties with horizontal lap siding. The design tools we are employing revolve around color, pattern, texture, scale, and detail. Subtle shifts of color and pattern will break down the building's mass, helping to alleviate the starkness of the existing facade. The texture of the new cladding will convey permanence and the scale of the cladding, and the window patterns will make the building compatible with the historic neighborhood where it resides.

Secondly, compatibility within the historic district is reinforced the decision to emphasize the residence balconies. As a result of the exterior renovation, the replacement of existing balconies offers an opportunity to re-evaluate the relationship the current balconies have with the surrounding context. As a result, the new proposal emphasizes the residential quality of the balconies by drawing your eye using playful color and permanence of materials.

Lastly, the proposal improves the project's relationship to the surrounding historic district by improving the pedestrian experience on the site. New outdoors spaces are created which offer special moments of pause and reflection and include a new north terrace outside the buildings ground floor community room. This emphasizes the building's relationship to the site and context by increasing the visual activity at the ground level.

III. MODIFICATIONS

**MODIFICATION #1:
SEE APPENDIX 26**

33.266.130.F.2 Parking Aisle Dimensions

Adjustment requested for section 33.266.130.F.2, to provide less than the required minimum width for the area of the drive aisle adjacent to the Standard 'B' loading space. This Adjustment is necessary for the following reasons:

- *Existing dimensions at this location on the site prohibit providing a full 20' wide drive aisle in addition to meeting the minimum width requirements of the Standard 'B' loading space.*
- *Propose maintaining required minimum width at Standard 'B' loading space, which reduces the allowable width of the drive aisle at that location to approximately 19'-4" wide.*

33.805.040 Approval Criteria

- ***A: Granting the adjustment will equally or better meet the purpose of the regulation to be modified***

Response: The purpose of this regulation is to "promote vehicle areas that are safe....for motorists and pedestrians" and "direct traffic in parking areas". The proposed reduction in width to this section of the drive aisle meets the purpose of this regulation by still providing significant width for access to loading space. This section of the drive aisle is also at the end of the parking lot and serves no other parking stalls except the loading space, so it should have no impact to the safety or direction of traffic of other areas of the parking lot.

- ***B: If in a residential zone, the proposal will not significantly detract from the livability or appearance of the residential area or if in an OS, C, E, I, or CI zone, the proposal will be consistent with the classifications of the adjacent streets and the desired character of the area***

Response: The proposed Adjustment is not anticipated to have any impact on the livability or appearance of the residential area and will be consistent with the classifications of the adjacent streets and the desired character of the area.

- ***C: If more than one adjustment is being requested, the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zone; and***

Response: Only one adjustment is being requested; therefore, this criterion will not apply.

- ***D: City-designated scenic resources and historic resources are preserved; and***

City designated scenic resources are identified on the Official Zoning Map with a lower case "s" and historic resources are designated by a large dot or as being

*within the boundaries of a Historic or Conservation district. * If the site is not considered a City designated scenic resource, this criterion will not apply.*

Response: The site is not considered a City-designated scenic resource; therefore, this criterion will not apply.

- ***E: Any impacts resulting from the adjustment are mitigated to the extent practical; and Mitigations should be related to and offset any impacts created by the Adjustment.***

Response: No impacts are anticipated from the proposed Adjustment; therefore, this criterion will not apply.

- ***F: If in an environmental zone, the proposal has as few significant detrimental environmental impacts on the resource and resource values as is practicable; or***

*Environmental overlay zones are designated on the Official Zoning Map with either a lowercase “p” (Environmental Protection overlay zone) or a “c” (Environmental Conservation overlay zone). * If the site is not considered a City designated environmental zone, this criterion will not apply.*

Response: The site is not considered a City designated environmental zone; therefore, this criterion will not apply.

**MODIFICATION #2:
SEE APPENDIX 26**

33.266.130.G.2.D.2 Perimeter Landscaping at Parking Areas

Modification requested to the minimum allowable L3 perimeter landscape at a lot line abutting an ‘R’ zone lot line. This modification is necessary for the following reasons:

- *Per Table 266-5, the minimum allowable perimeter landscape at a lot line abutting an ‘R’ zone lot line is 5 ft of L3.*
- *The existing drive aisle and loading area widths do not allow for expansion of the existing landscape buffer to the required 5’ minimum width without impacting the minimum required dimensions for the drive aisle and loading area.*

33.825.040 Approval Criteria

- ***Better meets design guidelines. The resulting development will better meet the applicable design guidelines; and***

Response: The proposal will better meet the guidelines by meeting the intent of the screening requirement to minimize the impact of parking to the neighboring properties while balancing its responsiveness to maintain the required dimensions for the drive aisle and loading area for safe use of the parking lot area.

- ***Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.***

Response: The purpose of the standard is to “promote vehicle areas that are safe and attractive for motorists and pedestrians” and “improve and soften the appearance of parking areas”. The proposal to modify the allowable minimum L3 perimeter landscape is consistent with the purpose of this standard.

- ***Mitigation of Impacts. Any impacts resulting from the modifications are mitigated to the extent practical.***

Response: No impacts are anticipated from this proposed modification.

MODIFICATION #3:

SEE APPENDIX 26

33.266.130.G.2.D.2 Perimeter Landscaping at Parking Areas

Modification requested for the elimination of the requirement for trees at a lot line abutting an ‘R’ zone lot line. This modification is necessary for the following reasons:

- *Existing perimeter landscaping is a tall arborvitae evergreen (shrub) hedge without trees.*
- *Modification proposes to leave existing arborvitae evergreen (shrubs) and not provide the required trees per lineal foot, as existing shrubs create a tall, continuous screening hedge that meets the requirement of its use to “promote compatibility between land uses by reducing the visual, noise, and lighting impacts of specific development on users of the site and abutting uses”.*

33.825.040 Approval Criteria

- ***Better meets design guidelines. The resulting development will better meet the applicable design guidelines; and***

Response: The proposal will better meet the guidelines buffering adjacent residential uses from vehicle areas with landscaping and taking advantage of existing landscaping that already provides this functionality.

- ***Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested.***

Response: The purpose of the standard is to “promote vehicle areas that are safe and attractive for motorists and pedestrians” and “improve and soften the appearance of parking areas”. The proposal to maintain this existing perimeter landscaping is consistent with the purpose of this standard.

- ***Mitigation of Impacts. Any impacts resulting from the modifications are mitigated to the extent practical.***

Response: No impacts are anticipated from this proposed modification.

END