

April 24, 2008

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Portland Development Services, Land Use Services Division
1900 SW Fourth Ave., Ste. 5000
Portland, Oregon 97201

Subject: Saint Andrews Condominiums Zoning Adjustment Submittal
SW 18th Avenue and SW Mill Street Terrace
Portland, Oregon
Land Use Review LU 08-106691 AD

Dear Ms. Savin,

The following are responses related to the (5) opposing statements in the St. Andrews Homeowners Association, prepared by Chris Coleman and dated April 11, 2008. An attached Site Plan shows the locations of the "Association", "Cable Village", and the "Carlisle" condominiums in the immediate vicinity of the proposed project.

NOTE: The proposed adjustments for the St. Andrews Condominium project are necessary because the property has a rise of nearly sixty feet from SW 18th Avenue, at its intersection with SW Mill Street Terrace, to the East toward Montgomery Drive above the Southeast corner of the property. The proposed placement of the building is closer to the Northwest corner, at 18th Avenue, due to the steep rise and necessary cliff to be excavated. This proposed placement requires adjustments to the North and West property line setbacks which is necessary to alleviate the current site conditions and allow a building to be constructed on the property.

Response to statement 1:

- The purpose of the reduced height for the first 10 feet of building adjacent to the front property line is generally to increase light and air on the street. This zoning code is appropriately applied to the Associations condos located further South on 18th Avenue, where the overall street right-of-way narrows down to 30 feet in width. It should be noted that the Cable Village Condos directly across 18th avenue do not comply with this requirement. The proposed St. Andrews condominium project is located on the 60 foot right-of-way at the intersection of Mill Street terrace and 18th Avenue where there is no possibility of future development on the West side of the proposed project.
- The proposed building meets the overall height limit (55 feet total) at most of the roof areas. The primary roof line where the mansard roof, the primary roof, intersects with the wall is at a height of 52'-10". The top of Sixth Floor Roof Terrace walls, the part of the building closer to the existing neighbors, is at a height of 52'-10". The 52'-10" roof line is a continuation of the existing roof line of the Association's condominiums. The Second Floor Garden Terrace is at a height of 14'-6", and is the area of the building closest to the adjacent neighbors. The gables and dormers exceed the height limit by 4'-4". The total width of the West/ Front façade of the building is 93 feet. The total width of gables and dormers which exceed the height limit is 37' or 40% of the front façade total width. Furthermore, the gables and dormers which exceed the height limit are closest to the elevated Highway 26 and directly across from the end of Mill Street Terrace where no existing neighbors exist or can exist. The proposed building's front elevation "steps" down to the South, toward the adjacent existing condominiums.
- The perception of the total height of the building is less severe compared to the existing condominiums further South on 18th Avenue. This is a result of the 60 foot wide public right-of-way in front of the proposed project verses the 30 foot public right-of-way in front of the existing condominiums to the South.
- The proposed project provides a much more comprehensive front landscaping area along the proposed improved 18th Avenue and proposed new sidewalk due to the increased public right-of-

way in comparison to the few plantings in front of the Association and Cable Village Condominiums.

- The Northern view of the most Northern unit of the Association condominium unit is not compromised by the requested adjustment to the height for the first 10 feet of building adjacent to the front property line. The proposed project is far enough East so that the primary view North from the existing condominium unit will remain the same. The existing topography and landscaping blocks the current Northeastern view from that unit and therefore the view will remain the same.

Response to statement 2:

- The majority of the wooded slope on the Eastern side of the Association Condominium lot is actually a separate piece of property owned by John Reilly. Therefore the developed footprint of those existing condominiums is much larger than what is claimed in the Associations opposing statement 2.
- The existing Association's condominiums share the same steep hillside as the proposed St. Andrews Condominium but have different property configurations. Its (3) existing units are arranged along a frontage nearly two and one half times longer than that of the proposed St. Andrews Condominium.
- The Association's existing units have front in, back out parking. The proposed St. Andrews Condominium project shall have drive-in, drive-out parking, a much safer relationship for pedestrians and vehicle traffic. To accommodate cars for the units, most of the site at street level is devoted to parking requirements, which cut into the hillside.
- While the Second Floor Roof Garden Terrace above the parking Garage is included in the total percent of lot coverage, the actual building, where the living units are located is less than the 60% maximum allowable lot coverage. Had the car parking area on the first floor been left uncovered, the remaining building would have been within the code requirement. The proposed landscaped roof/terrace above the proposed garage will be more attractive to the neighbors than the alternative uncovered parking lot. Furthermore, the landscaped roof/terrace is below grade on all sides except for a portion of the west side along 18th Avenue. The exposed wall is to be clad with stone paneling and have substantial landscaping.
- Part of the West wall of the proposed Garage must remain even if the roof/terrace is not accepted by the city due to the existing berm in the city public right-of-way at the South end of the West side of the site. PDOT will not allow any retaining wall within the public right-of-way, therefore a retaining wall of some sort is required at the same location.
- The "bulks" of the Carlisle Condominium at the end of 18th Avenue and the Cable Village Condominium on the West side of 18th Avenue are each significantly larger than that of the proposed St. Andrews Condominium. The combined bulk of the Association's (3) buildings is greater than that of the proposed St. Andrews Condominium, but arranged horizontally, not vertically. The frontage of the Association's condominiums overwhelms the street due to its close proximity to 18th Avenue. The continuous and repetitive front facades (garage doors) of the Association's condominiums are 9 feet from street. The proposed St. Andrews Condominium front façade is 16 feet from the street at its closest point and more than 30 feet from the street at the South end, closest to the Association Condominium. The proposed project's additional distance from the street also causes ones perception of the total height of the building to be less severe.
- The absolute height of the Carlisle Condominiums above the same datum point at the foot of Mill Street Terrace is higher than the proposed St. Andrews condominium project. This is a result of the steep rise in 18th Avenue.

Response to statement 3:

- Sightlines: The view North from the Association's North unit will not be altered anymore than it is now due the fact that there are no buildings in the public street right-of-way. Existing trees in the planting area on the right-of-way currently obstruct views to the Northeast from the existing Northern most unit. Furthermore, codes do not protect views across neighboring properties, even if there was an obtainable view to the Northeast where the proposed St. Andrews Condominium is to be located.

- The existing Northern most unit of the Association's condominium will incur no greater "loss of privacy" from the proposed St. Andrews Association Condominium project. There are no direct views from the habitable interior spaces of the proposed St. Andrews Condominium to the Association's existing Condominiums due to the proposed layout of the floor plans. The proposed project's closest wall containing habitable space is 25 feet away from that existing unit. The view between those units is indirect and also will be obstructed by new landscaping. The Second Floor Roof Garden Terrace is below the proposed cliff and its view to the South is therefore obstructed. The existing Cable Village Condominiums to the West of the Association's condominiums have a much more direct view of one another.
- The spaces which make up the front of the proposed building within the first 10 feet of the property line include the stairs, elevator, and foyers. These spaces act as a privacy buffer between the apartment units and the street, and also the close-by existing neighbors.

Response to statement 4:

- The site of the proposed St. Andrews Condominium project has all of the constraints for which the basic rationale of "adjustments" were created. The property is not a "flat, regularly shaped lot." Based on the size of the lot, additional units could have been planned for the property, but the owner has chosen (4) stacked units instead of row-house plans. The row house plan would require backing into the street. In summation, the proposed units offer a pleasant, planted area in front of the building and a parking garage which allows safe access to the street and which is essentially covered with a terrace/ yard. The reduced setback is mitigated by the fact that no other buildings can ever be placed across the street. The height in totality is no greater than that of the Carlisle Condominiums from the base point. The "bulk" of the proposal is less than that of the existing Cable Village and Carlisle Condominiums.
- The proposed St. Andrews Condominium is specifically designed for an R1 zone. An RH zone allows and/or requires the following:
 - Allows mixed used development with retails sales, service, and office use
 - Allows up to 100 feet in building height
 - Allows us to 85% of site in maximum building coverage
 - Outdoor areas are not required
 - Requires more units than the (4) units which are contained in the proposed project
 It is clear that the proposed project does not contain any of these features or uses.
- The design of the proposed St. Andrews Condominium project contains several residential architectural elements which break up its overall mass and provide it with a look which is appropriate for the neighborhood. These elements include:
 - Stonework with deep reveals at 18 inches on center vertically
 - Smaller, encased windows in lieu of storefront or curtain wall windows
 - Bay windows on the front and both sides
 - Many stone ornaments including posts, gables, window casings, and stone band work
 - Mansard roof with dormers
 - The overall elevations are divided into (3) sections; base, middle, and top. The base and the top will have elevations made up of a lighter colored stone while the middle section will be made up of a darker colored stone.

All of the above ultimately provide a building which is designed according to classical architectural proportions and styles which have been used for centuries for the very purpose of creating human scale thereby not overwhelming the street or its neighbors.