October 23rd, 2019

Updated: 11/13/2019

**DESIGN REVIEW TYPE III NARRATIVE**

This project is new ground up, 4 story senior living facility located in Beaverton, Oregon. The total site area is approximately 225,432 SF (revised per Right of Way adjustment), with a building footprint of approximately 64,070 SF.

The senior living facility will house a mix of independent living units, assisted living units, and memory care units. The ground floor will house all the memory care units, with an interior courtyard to be utilized by the memory care patients. The majority of the common and service areas will be located on the first floor including but not limited to: pool, gym, salon, commercial kitchen, four full-service dining areas, reception, multi-purpose rooms and an outdoor rooftop deck amenity space.

**CHANGES TO THE SITE**

- The existing site contains 1 single family residence that will be removed
- 0.5 acres of the 0.75 acres of existing wetland will be mitigated for development of the site.
  - Remaining wetland to be improved per clean water services requirements.
  - Mitigation of wetland has been reviewed by the Army corps of engineers.
- Right of way will be dedicated for NW 185th Avenue (67 feet) and NW Walker Road (51.5 feet).
- Removal of existing trees

**BEAVERTON SENIOR LIVING COMMUNITY HOURS OF OPERATION**

Hours of operations: 24 hours per day
Total Employees: 100-120
Maximum Employees on peak shift: 40-50
Types of operations (Below utilize the same staff throughout building)
  - Memory Care (Conditional Use)
  - Assisted Living (Conditional Use)
  - Independent Living (Permitted)

**Chapter 20 – Land Uses**

**20.05.10 Purpose**

2. R2 Residential Urban Medium Density District (2,000)

The R2 District is intended to establish medium density residential developments where a minimum land area of 2,000 square feet is available for each dwelling unit.

**20.05.15 Site Development Standards for R2**

Site Development Standards support implementing development consistent with the corresponding zoning district. All superscript notations refer to applicable regulations or clarifications as noted in footnotes below.
A. Minimum Land Area for R2 = 2,000 SF

**Response:** The project's land area is 225,432 SF, which meets the requirement.

C. Lot Dimensions for R2

1. Minimum Width
   a. Interior = 14’
   b. Corner = 20’
2. Minimum Depth
   a. Interior = None
   b. Corner = None

**Response:** The project site is 5.2 acres and well exceeds the minimum width & depth for lot dimensions for R2.

F. Minimum Yard Setbacks for R2

1. Front = 10’
2. Side = 0’ or 5’ or 10’
3. Rear = 15’
4. Garage = not applicable for this application
5. Garage Door to Rear = not applicable for this application
6. Minimum Between Buildings = not applicable for this application

**Response:** The new senior living building has a front yard setback of 10’ and a side yard setback of 5’. This meets the requirement.

H. Building Height for R2.

1. Maximum = 40’

**Response:** The new senior living building is approximately 48’ and is requesting a major modification for the height due to unique site constraint brought about by a large wetland and Washington County dedications for the NW 185th Avenue and NW Walker Road.

20.05.20 Land Uses for R2

2. Dwelling: B. Attached Dwelling Facilities are a permitted within R2 zone.
3. Care: D. Residential Care Facilities are allowed as a conditional use within R2 zone.

20.25.05 Minimum Residential Density

A. Minimum residential density is calculated as follows:

1. Refer to the definition of Acreage, Net. Multiply the net acreage by 0.80.
Response: Site acreage excluding Right-of-Way dedications and Wetlands = 193,710 SF

193,710 SF * 0.80 = 154,968 SF

2. Divide the resulting number in step 1 by the minimum land area required per dwelling for the applicable zoning district to determine the minimum number of dwellings that must be built on the site.

Response: 154,968 SF / 2,000 SF = 77 dwelling units

3. If the resulting number in step 2 is not a whole number, the number is rounded to the nearest whole number as follows: If the decimal is equal to or greater than 0.5, then the number is rounded up to the nearest whole number. If the decimal is less than 0.5, then the number is rounded down to the nearest whole number.

Response: Minimum Residential Density = 77 dwelling units required on the site. Once completed the Beaverton Senior Living Community will have 100 residential units on site. This meets the density requirement.

20.25.10 Floor Area Ratio

A. Floor Area. Floor Area is dependent upon whether residential development is involved or not. Residential only development is governed by minimum and maximum densities.

Response: Floor Area ratio calculations are not applicable to this residential building.

20.25.15 Density Allowances

B. Maximum Density. Maximum Residential and Floor Area density is calculated based upon site gross acreage.

Response: Maximum density will be used to calculate total Independent living units 225,432 GSF / 2,000 SF (min/max) = 112 Units. Assisted Living and MC are not R occupancy and therefore are not required as units for min or max density as “units”. Once completed the Beaverton Senior Living Community will have 100 residential (independent living) units on site. This meets the density requirements.

Chapter 40 – Applications

40.03 Facilities Review Committee

1. All Conditional Use, Design Review Two, Design Review Three, and applicable Land Division applications:

Response: Beaverton Senior Living Community, with required adjustments for height, parking, and loading, complies with Design Review Three, Conditional Use, and applicable Land Division applications.

A. All critical facilities and services related to the proposed development have, or can be improved to have, adequate capacity to serve the proposed development at the time of its completion.
Response: See attached will serve letters provided from utility companies demonstrating that facility will not over burden existing critical facility and services.

**Water** – The site will have access to public water provided by the City of Beaverton. A new looped main on the site will provide adequate fire and potable water service to the project and will not impact the public system off site. City of Beaverton has issued an SPL confirming that the existing public water system is adequate to serve the project.

**Sewer** – Sanitary sewer (wastewater) is administered by Beaverton/Clean Water Services. A new main will be constructed on site to connect to an existing 8-inch main to the south. We are actively coordinating with Beaverton and/or CWS, as applicable, to ensure that capacity is available in the existing sanitary sewer system for the project's wastewater.

**Stormwater** – The project will treat and detain stormwater on-site and discharge to the natural location. Design of stormwater treatment for the project is subject to Clean Water Services R&O 19-5 standards (CWS), as adopted and amended by the 2019 Engineering Design Manual (EDM) of the City of Beaverton, and additional SLOPES requirements as required. Runoff from the developed site is designed for collection and treatment using on-site detention and water quality facilities to mitigate impacts of impervious surface created by the development. Low Impact Development Approaches (LIDA) have been considered for the site, but due to space and soil constraints, none are considered practical for inclusion on the project. Water quality treatment for onsite impervious surface runoff is provided by two proprietary treatment vaults. Mitigation of runoff from the frontage improvements is proposed using a proprietary cartridge filter along N.W. 185th Avenue. Please refer to the Preliminary Drainage Report prepared by Barghausen Consulting Engineers, Inc. dated September 27, 2019.

**Transportation** – The project will construct frontage improvements consistent with Washington County and Beaverton requirements on 185th and Walker. Right-of-way dedication will also be completed for both frontage as applicable and required by Washington County.

Today and in the year 2020, all study intersections are forecast to continue to meet applicable operational standards. However, the NW Walker Road/NW 185th Avenue intersection (as well as many of the intersections along NW 185th Avenue to the north and south of the study area) experiences long queues on all approaches. Due to the low trip generation, development of the site is not anticipated to result in any measurable impacts on the queuing.

Although not able to meet the 600 feet arterial spacing standard, the site can be served by the proposed accesses. Each site access has been located to minimize potential for queuing conflicts associated with the NW 185th Avenue/NW Walker Road traffic signal, be subject to right-in-right-out movements only given the provision of raised medians on both roadways.

**Utilities** – We have coordinated and obtained Will Serve letters from Frontier Communications for telephone and Portland General Electric Company (PGE) for
electrical services. We are also coordinating with Northwest Natural for natural gas service. Coordination for cable TV and internet services will occur prior to construction to ensure all necessary services are available.

B. Essential facilities and services related to the proposed development are available, or can be made available, with adequate capacity to serve the development prior to its occupancy. In lieu of providing essential facilities and services, a specific plan may be approved if it adequately demonstrates that essential facilities, services, or both will be provided to serve the proposed development within five (5) years of occupancy.

Response: Site has access to the essential facilities and services required for operation at buildings max operating capacity.

Schools – The proposed senior housing facility will have no impact on capacities of local schools.

Transit – The proposed senior housing facility will relocate an existing bus stop on N.W. Walker Road during road widening. On-site pedestrian routes will connect to the bus stop on N.W. Walker Road and the sidewalk on N.W. 185th Avenue for access to the bus stop to the south. The proposal is expected to have no impact on capacities of existing transit facilities as the future CA Ventures Facility will have its own transportation service for its residents and ridership on public transit will be limited.

Police – An incremental impact to police and emergency services from the project; however, the impacts are expected to have no impact on capacities of police services.

On-site Pedestrian – The project is designed to provide on-site walkways around the building and pedestrian connections to the parking areas and adjacent public streets.

Bicycle facilities in public right-of-way – The project's frontage improvements will relocate/modify existing bike lanes consistent with Washington County standards. The proposal is expected to have no impact on capacities of existing bike facilities in public right-of-way.

C. The proposed development is consistent with all applicable provisions of Chapter 20 (Land Uses) unless the applicable provisions are modified by means of one or more applications which shall be already approved or which shall be considered concurrently with the subject application; provided, however, if the approval of the proposed development is contingent upon one or more additional applications, and the same is not approved, then the proposed development must comply with all applicable provisions of Chapter 20 (Land Uses).

Response: Beaverton senior living facility complies with chapter 20 provisions if the major and minor modifications that are being reviewed concurrently with the design review III and conditional use permits are not approved by the city.

D. The proposed development is consistent with all applicable provisions of Chapter 60 (Special Requirements) and all improvements, dedications, or both, as required by
the applicable provisions of Chapter 60 (Special Requirements), are provided or can be provided in rough proportion to the identified impact(s) of the proposed development.

Response: Beaverton senior living facility complies with the special requirements outlined in chapter 60 or is providing a major/minor modification to deviate from the condition. Please see below for response to the chapter 60 provisions.

E. Adequate means are provided or can be provided to ensure continued periodic maintenance and necessary normal replacement of the following private common facilities and areas, as applicable: drainage facilities, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas, and other facilities not subject to maintenance by the City or other public agency.

Response: Beaverton senior living facility will continually maintain all applicable areas including: drainage facilities, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas, and other facilities not subject to maintenance by the City or other public agency.

F. There are safe and efficient vehicular and pedestrian circulation patterns within the boundaries of the development.

Response: Beaverton senior living facility provides safe pedestrian and circulation patterns around the building and site. Speed limits in the driving area will be marked, and pedestrian cross walks are indicated with a change in the driving surface.

G. The development's on-site vehicular and pedestrian circulation systems connect to the surrounding circulation systems in a safe, efficient, and direct manner.

Response: Beaverton senior living facility has worked with Washington county and the city of Beaverton on the site access location. Washington County NW Walker Road and NW 185th Avenue road expansion project have been incorporated into this design; with special consideration to access points and right of way dedications.

H. Structures and public facilities serving the development site are designed in accordance with adopted City codes and standards and provide adequate fire protection, including, but not limited to, fire flow.

Response: Beaverton Senior Living facility complies with local and state codes and has been working with TVFR for fire access and circulation. Facility will meet fire flow requirements necessary to serve the building.

I. Structures and public facilities serving the development site are designed in accordance with adopted City codes and standards and provide adequate protection from crime and accident, as well as protection from hazardous conditions due to inadequate, substandard or ill-designed development.
**Response:** Beaverton Senior Living facility complies with local and state codes. Site lighting and security cameras will be placed around the site to provide for additional security to residents.

J. Grading and contouring of the development site is designed to accommodate the proposed use and to mitigate adverse effect(s) on neighboring properties, public right-of-way, surface drainage, water storage facilities, and the public storm drainage system.

**Response:** Beaverton Senior Living facility is graded in such a way as to mitigate site drainage from affecting neighboring properties. A portion of the site drainage will be utilized to enhance the wetlands on site.

K. Access and facilities for physically handicapped people are incorporated into the development site and building design, with particular attention to providing continuous, uninterrupted access routes.

**Response:** Beaverton Senior Living facility meets state and local codes, including the ANSI A117.1 for accessibility.

L. The application includes all required submittal materials as specified in Section 50.25.1. of the Development Code. [ORD 4265; October 2003]

**Response:** Beaverton Senior Living facility has provided the required submittal materials for the Design Review III, Conditional Use, and various Major and Minor Modifications.
40.10 Adjustment
40.10.15 Application

2. **Major Adjustment (For Height)**

   **A. Threshold.** An application for a New Conditional Use shall be required when the following threshold applies:

   **Response:** Beaverton Senior Living Community will comply with Major adjustment application requirements Threshold #1 requirements to increase the overall height of the building align with the needs of a sized senior living facility. Zoning allows for a maximum height of 40’; adjustment is requesting a height increase to 48’ which falls between the 10-50% adjustment criterion. Applications for Major adjustments has been submitted concurrently with Type 3 review and Conditional use reviews.

   **B. Procedure Type.** The Type 3 procedure, as described in Section 50.45. of this Code, shall apply to an application for Major Adjustment. The decision-making authority will be the Planning Commission.

   **Response:** Beaverton Senior Living Community will comply with the procedures described in 50.45.

   **C. Approval Criteria.** In order to approve a Major Adjustment application, the decision-making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

   1. **The proposal satisfies the threshold requirements for a Major Adjustment application.**

      **Response:** Beaverton Senior living community satisfies the thresholds established in Beaverton Development Code chapter 40.10.15.2 for a Major Adjustment for height increase from 40’ to 48. Please see attached written statement for additional information.

   2. **The application complies with all applicable submittal requirements as specified in Section 50.25.1 and includes all applicable City application fees.**

      **Response:** Fees have been submitted along with the application for a Major modification for height increase.

   3. **Special conditions or circumstances exist on the site that make it difficult or impossible to meet the applicable development standard for an otherwise acceptable proposal.**

      **Response:** Beaverton Senior Living Community can demonstrate that an existing wetland on the site, along with Washington County’s street expansions of NW 185th Avenue and NW Walker Road has placed unique obstacles that will require major modifications to the building height to achieve appropriate density for site.
4. The special conditions or circumstances do not result from the actions of the applicant and such conditions and circumstances do not merely constitute financial hardship or inconvenience.

Response: Beaverton Senior Living Community can demonstrate that an existing wetland on the site, along with Washington County’s street expansions of NW 185th Avenue and NW Walker Road has placed unique obstacles that will require major modifications to the building height to achieve appropriate density for site. These circumstances directly affect the applicants ability to provide services that are typical in the clients service and care models.

5. Granting the adjustment as part of the overall proposal will not obstruct pedestrian or vehicular movement.

Response: Granting an adjustment to the height will have no effect on pedestrian and vehicular movement.

6. City designated significant trees and/or historic resources, if present, will be preserved.

Response: No significant trees and/or historic resources have been identified on site.

7. If more than one adjustment is being requested concurrently, the cumulative effect of the adjustments will result in a proposal which is still consistent with the overall purpose of the applicable zoning district.

Response: Proposed major adjustments to the height, parking count and bicycle parking count, along with a loading determination have been submitted for review concurrently with Design review application. All work towards meeting the overall purpose of the medium density residential zoning district. Independent units are directly allowed in the R2 zone as Dwellings, Attached and will adhere to zoning mandated minimum and maximum density requirements for the site. Assisted Living and Memory Care units are covered as a conditional use as a residential care facility for the R2 zone, and are going through a New Conditional Use review process concurrently.

The three major adjustments (decrease bicycle parking count, decrease vehicular parking count, and increase building height) are proposed as a solution towards the large impacts the unique conditions of the wetland and it’s 50’ buffer along with the NW 185th Avenue and NW Walker Road impose upon the site and this building. These adjustments will allow this building to meet the overall intent of the medium density residential zone by:

- Increasing the height allows this project to maintain the minimum and maximum density requirements.
- Decreasing the vehicular and bicycle parking to a ratio that still provides the level of service required by this type of facility, allows a portion of the
wetland to be maintained and for a buffer to be improved per clean water services requirements.

8. Any adjustment granted shall be the minimum necessary to permit a reasonable use of land, buildings, and structures.

Response: Numerous site constraints have been identified on this site, which require various forms of modifications. The Washington county right of way expansion of NW 185th and NW Walker road will impose limitations such as decrease buildable area on site, landscaping and sidewalk improvements that are currently not provided on site.

The Wetland to the East of the property has a ½ acre to be mitigated, the remaining wetland along the East property line will be maintained and improved. The Mitigated wetland has been reviewed by Clean Water Services, The Department of State Lands, and the Army Corps of Engineers. This remaining wetland will include a 50’ buffer in which no site development may occur, putting additional constrain on where and how much site can be developed.

Tualatin Valley Fire and Rescue has reviewed the site for emergency vehicle access; it has been identified that access needs to be provided around the building and that portions of the onsite drive lane need to accommodate aerial apparatus. The result is a 26’ drive aisle around half of the building and 22’ around the remainder of the building.

The proposed development provides reasonable accommodation for fire access, a vehicle and bicycle parking ratio that is typical senior a senior use, and adequate outdoor amenity space for residence.

Site is zoned R-2 and has R-2 zones to the East and South of the property. The properties to the North and West are zoned for commercial use. Senior living facilities are ideal use’s in sites like this as their resident/commercial function creates a buffer between these use types, their low trip generation reduces overburdening of streets.

A building height increase has been requested to allow the north wing of the proposed facility to gain a 4th story. This will allow the facility to meet the minimum and maximum densities required for the residential zone. The southern wing of the building will remain 3 stories and will not breach the zoning required 40’ max height. This was done to maintain a scale similar to southern neighboring property condos.

9. The proposal incorporates building, structure, or site design features or some combination thereof that compensate for the requested adjustment.

Response: The proposed adjustments all for an efficient and compact layout of the building, good pedestrian and vehicular access to the site, and allows a portion of the exiting wetland to remain.

10. The proposal is consistent with all applicable provisions of Chapter 20 (Land Uses) unless applicable provisions are modified by means of one or more Adjustment, Variance, Planned Unit Development applications that
already have been approved or are considered concurrently with the subject proposal.

Response: Beaverton Senior Living Community is consistent with all provisions of Chapter 20, with exception to the Building Height, vehicular parking count, and bicycle parking counts. Please see narrative for detail response of how project meets chapter 20 provisions and major modification provisions.

11. The proposal is consistent with all applicable provisions of Chapter 60 (Special Requirements) and that all improvements, dedications, or both required by the applicable provisions of Chapter 60 (Special Requirements) are provided or can be provided in rough proportion to the identified impact(s) of the proposal.

Response: Beaverton Senior Living Community is consistent with all provisions of Chapter 60, with exception to the Building Height, vehicular parking count, Tree plan 2, and bicycle parking counts. Please see approval criteria provided in narrative for Design review 3, Conditional use, tree plan 2, loading determination, and other major modifications for additional details.

12. Adequate means are provided or can be provided to ensure continued periodic maintenance and necessary normal replacement of the following private common facilities and areas: drainage ditches, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas and other facilities, not subject to periodic maintenance by the City or other public agency.

Response: Beaverton Senior Living Community will provide adequate means to ensure the continued periodic maintenance and periodic replacement of the following private common facilities and areas: drainage ditches, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas and other facilities, not subject to periodic maintenance by the City or other public agency.

13. The proposal does not include any lot area averaging as specified in Section 20.05.50.1.B. or include any lot dimension reductions as specified in Sections 20.05.50.2.A.2 and .4 or 20.05.50.2.B.2 and .4.

Response: Beaverton Senior Living Community does not utilize lot averaging.

14. Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.

Response: The following applications have been submitted concurrently to the city for review: Type Three Review, New Conditional Use, Major Adjustment for height, Major Adjustment for parking, Loading determination, Tree Plan Type 2, and Property Line Replat Type 1.
D. Submission Requirements. An application for a Major Adjustment shall be made by the owner of the subject property, or the owner's authorized agent, on a form provided by the Director and shall be filed with the Director. The Major Adjustment application shall be accompanied by the information required by the application form, and by Section 50.25. (Application Completeness), and any other information identified through a Pre-Application Conference

Response: Beaverton Senior Living Community complies with submission requirements, see attached application.
40.10.15 Application

2. Major Adjustment (For Reduced Parking)

   A. Threshold. An application for a New Conditional Use shall be required when the following threshold applies:

   Response: Beaverton Senior Living Community will comply with Major adjustment application requirements Threshold #1 requirements to decrease the overall parking count of the building to align with the typical needs of a similar sized senior living facility. Adjustment is requesting a parking count decrease from 194 stalls to 146 stalls which falls between the 10-50% adjustment criterion. Applications for Major adjustments has been submitted concurrently with Type 3 review and Conditional use reviews.

   B. Procedure Type. The Type 3 procedure, as described in Section 50.45. of this Code, shall apply to an application for Major Adjustment. The decision-making authority will be the Planning Commission.

   Response: Beaverton Senior Living Community will comply with the procedures described in 50.45.

   C. Approval Criteria. In order to approve a Major Adjustment application, the decision-making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

   1. The proposal satisfies the threshold requirements for a Major Adjustment application.

   Response: Beaverton Senior living community satisfies the thresholds established in Beaverton Development Code chapter 40.10.15.2 for a Major Adjustment for parking stall reductions from 194 required by zoning to 146 parking stalls. Please see attached written statement and Traffic analysis and parking memo for additional information.

   2. The application complies with all applicable submittal requirements as specified in Section 50.25.1 and includes all applicable City application fees.

   Response: Fees have been submitted along with the application for a Major modification for parking count decrease.

   3. Special conditions or circumstances exist on the site that make it difficult or impossible to meet the applicable development standard for an otherwise acceptable proposal.

   Response: Beaverton Senior Living Community can demonstrate that an existing wetland on the site, along with Washington County’s street expansions of NW 185th Avenue and NW Walker Road has placed unique obstacles that will require major modifications to the sites parking needs to achieve appropriate parking ratio for a residential care facility with independent living units.
4. The special conditions or circumstances do not result from the actions of the applicant and such conditions and circumstances do not merely constitute financial hardship or inconvenience.

Response: Beaverton Senior Living Community can demonstrate that an existing wetland on the site, along with Washington County’s street expansions of NW 185th Avenue and NW Walker Road has placed unique obstacles that will require major modifications to the sites parking needs to achieve appropriate parking ratio for a residential care facility with independent living units. These circumstances directly affect the applicant’s ability to meet zoning defined parking needs and still provide services that are typical in the client’s service and care models.

5. Granting the adjustment as part of the overall proposal will not obstruct pedestrian or vehicular movement.

Response: Granting an adjustment to the parking count will have no effect on pedestrian and vehicular movement.

6. City designated significant trees and/or historic resources, if present, will be preserved.

Response: No significant trees and/or historic resources have been identified on site.

7. If more than one adjustment is being requested concurrently, the cumulative effect of the adjustments will result in a proposal which is still consistent with the overall purpose of the applicable zoning district.

Response: Proposed major adjustments to the height, parking count and bicycle parking count, along with a loading determination have been submitted for review concurrently with Design review application. All work towards meeting the overall purpose of the medium density residential zoning district. Independent units are directly allowed in the R2 zone as Dwellings, Attached and will adhere to zoning mandated minimum and maximum density requirements for the site. Assisted Living and Memory Care units are covered as a conditional use as a residential care facility for the R2 zone, and are going through a New Conditional Use review process concurrently.

The three major adjustments (decrease bicycle parking count, decrease vehicular parking count, and increase building height) are proposed as a solution towards the large impacts the unique conditions of the wetland and it’s 50’ buffer along with the NW 185th Avenue and NW Walker Road impose upon the site and this building. These adjustments will allow this building to meet the overall intent of the medium density residential zone by:

- Increasing the height allows this project to maintain the minimum and maximum density requirements.
- Decreasing the vehicular and bicycle parking to a ratio that still provides the level of service required by this type of facility, allows a portion of the
wetland to be maintained and for a buffer to be improved per clean water services requirements.

8. Any adjustment granted shall be the minimum necessary to permit a reasonable use of land, buildings, and structures.

Response: Numerous site constraints have been identified on this site, which require various forms of modifications. The Washington county right of way expansion of NW 185th and NW Walker road will impose limitations such as decrease buildable area on site, landscaping and sidewalk improvements that are currently not provided on site.

The Wetland to the East of the property has a ½ acre to be mitigated, the remaining wetland along the East property line will be maintained and improved. The Mitigated wetland has been reviewed by Clean Water Services, The Department of State Lands, and the Army Corps of Engineers. This remaining wetland will include a 50’ buffer in which no site development may occur, putting additional constrain on where and how much site can be developed.

Tualatin Valley Fire and Rescue has reviewed the site for emergency vehicle access; it has been identified that access needs to be provided around the building and that portions of the onsite drive lane need to accommodate aerial apparatus. The result is a 26’ drive aisle around half of the building and 22’ around the remainder of the building.

The proposed development provides reasonable accommodation for fire access, a vehicle and bicycle parking ratio that is typical senior a senior use, and adequate outdoor amenity space for residence.

Site is zoned R-2 and has R-2 zones to the East and South of the property. The properties to the North and West are zoned for commercial use. Senior living facilities are ideal use’s in sites like this as their resident/commercial function creates a buffer between these use types, their low trip generation reduces overburdening of streets.

A building height increase has been requested to allow the north wing of the proposed facility to gain a 4th story. This will allow the facility to meet the minimum and maximum densities required for the residential zone. The southern wing of the building will remain 3 stories and will not breach the zoning required 40’ max height. This was done to maintain a scale similar to southern neighboring property condos.

9. The proposal incorporates building, structure, or site design features or some combination thereof that compensate for the requested adjustment.

Response: The proposed adjustments allow for an efficient and compact layout of the building, good pedestrian and vehicular access to the site, and allows a portion of the exiting wetland to remain.

10. The proposal is consistent with all applicable provisions of Chapter 20 (Land Uses) unless applicable provisions are modified by means of one or more Adjustment, Variance, Planned Unit Development applications that
already have been approved or are considered concurrently with the subject proposal.

Response: Beaverton Senior Living Community is consistent with all provisions of Chapter 20, with exception to the Building Height, vehicular parking count, and bicycle parking counts. Please see narrative for detail response of how project meets chapter 20 provisions and major modification provisions.

11. The proposal is consistent with all applicable provisions of Chapter 60 (Special Requirements) and that all improvements, dedications, or both required by the applicable provisions of Chapter 60 (Special Requirements) are provided or can be provided in rough proportion to the identified impact(s) of the proposal.

Response: Beaverton Senior Living Community is consistent with all provisions of Chapter 60, with exception to the Building Height, vehicular parking count, Tree plan 2, and bicycle parking counts. Please see approval criteria provided in narrative for Design review 3, Conditional use, tree plan 2, loading determination, and other major modifications for additional details.

12. Adequate means are provided or can be provided to ensure continued periodic maintenance and necessary normal replacement of the following private common facilities and areas: drainage ditches, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas and other facilities, not subject to periodic maintenance by the City or other public agency.

Response: Beaverton Senior Living Community will provide adequate means to ensure the continued periodic maintenances and periodic replacement of the following private common facilities and areas: drainage ditches, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas and other facilities, not subject to periodic maintenance by the City or other public agency.

13. The proposal does not include any lot area averaging as specified in Section 20.05.50.1.B. or include any lot dimension reductions as specified in Sections 20.05.50.2.A.2 and .4 or 20.05.50.2.B.2 and .4.

Response: Beaverton Senior Living Community does not utilize lot averaging.

14. Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.

Response: The following applications have been submitted concurrently to the city for review: Type Three Review, New Conditional Use, Major Adjustment for height, Major Adjustment for vehicle parking, Major Adjustment for bicycle parking, Loading determination, Tree Plan Type 2, and Property Line Replat Type 1.
D. Submission Requirements. An application for a Major Adjustment shall be made by the owner of the subject property, or the owner’s authorized agent, on a form provided by the Director and shall be filed with the Director. The Major Adjustment application shall be accompanied by the information required by the application form, and by Section 50.25. (Application Completeness), and any other information identified through a Pre-Application Conference.

Response: Beaverton Senior Living Community complies with submission requirements, see attached application.
2. Major Adjustment (For Reduced Bicycle Parking)

A. Threshold. An application for a New Conditional Use shall be required when the following threshold applies:

Response: Beaverton Senior Living Community will comply with Major adjustment application requirements Threshold #1 requirements to decrease the overall bicycle parking count of the building to align with the typical needs of a similar sized senior living facility. Adjustment is requesting a bicycle parking count decrease from 108 stalls to 60 stalls which falls between the 10-50% adjustment criterion. Applications for Major adjustments has been submitted concurrently with Type 3 review and Conditional use reviews.

B. Procedure Type. The Type 3 procedure, as described in Section 50.45. of this Code, shall apply to an application for Major Adjustment. The decision-making authority will be the Planning Commission.

Response: Beaverton Senior Living Community will comply with the procedures described in 50.45.

C. Approval Criteria. In order to approve a Major Adjustment application, the decision-making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

1. The proposal satisfies the threshold requirements for a Major Adjustment application.

Response: Beaverton Senior living community satisfies the thresholds established in Beaverton Development Code chapter 40.10.15.2 for a Major Adjustment for bicycle parking stall reductions from 108 required by zoning to 60 bicycle parking spaces. 40 exterior parking spaces will be covered by the canopies adjacent to the front entry and ILF entry. 20 of the exterior parking spaces will be uncovered and located in the back of the building. A reduction in the bicycle parking is requested for the following reasons: a staffing count of 40-50 maximum per shift, site is located in close proximity to city transit, and the median resident age being 81-83 years old and not riding bicycles.

2. The application complies with all applicable submittal requirements as specified in Section 50.25.1 and includes all applicable City application fees.

Response: Fees have been submitted along with the application for a Major modification for height increase.

3. Special conditions or circumstances exist on the site that make it difficult or impossible to meet the applicable development standard for an otherwise acceptable proposal.

Response: Beaverton Senior Living Community can demonstrate that an existing wetland on the site, along with Washington County’s street expansions of NW 185th Avenue and NW Walker Road has placed unique obstacles that will require major
modifications to the site's parking needs to achieve appropriate parking ratio for a residential care facility with independent living units.

4. The special conditions or circumstances do not result from the actions of the applicant and such conditions and circumstances do not merely constitute financial hardship or inconvenience.

**Response:** Beaverton Senior Living Community can demonstrate that an existing wetland on the site, along with Washington County's street expansions of NW 185th Avenue and NW Walker Road has placed unique obstacles that will require major modifications to the site's parking needs to achieve appropriate parking ratio for a residential care facility with independent living units. These circumstances directly affect the applicant's ability to meet zoning defined bicycle parking needs and still provide services that are typical in the client's service and care models.

5. Granting the adjustment as part of the overall proposal will not obstruct pedestrian or vehicular movement.

**Response:** Granting an adjustment to the parking count will have no affect on pedestrian and vehicular movement.

6. City designated significant trees and/or historic resources, if present, will be preserved.

**Response:** No significant trees and/or historic resources have been identified on site.

7. If more than one adjustment is being requested concurrently, the cumulative effect of the adjustments will result in a proposal which is still consistent with the overall purpose of the applicable zoning district.

**Response:** Proposed major adjustments to the height, parking count and bicycle parking count, along with a loading determination have been submitted for review concurrently with Design review application. All work towards meeting the overall purpose of the medium density residential zoning district. Independent units are directly allowed in the R2 zone as Dwellings, Attached and will adhere to zoning mandated minimum and maximum density requirements for the site. Assisted Living and Memory Care units are covered as a conditional use as a residential care facility for the R2 zone and are going through a New Conditional Use review process concurrently.

The three major adjustments (decrease bicycle parking count, decrease vehicular parking count, and increase building height) are proposed as a solution towards the large impacts the unique conditions of the wetland and it's 50' buffer along with the NW 185th Avenue and NW Walker Road impose upon the site and this building. These adjustments will allow this building to meet the overall intent of the medium density residential zone by:

- Increasing the height allows this project to maintain the minimum and maximum density requirements.
• Decreasing the vehicular and bicycle parking to a ratio that still provides the level of service required by this type of facility, allows a portion of the wetland to be maintained and for a buffer to be improved per clean water services requirements.

8. Any adjustment granted shall be the minimum necessary to permit a reasonable use of land, buildings, and structures.

Response: Numerous site constraints have been identified on this site, which require various forms of modifications. The Washington county right of way expansion of NW 185th and NW Walker road will impose limitations such as decrease buildable area on site, landscaping and sidewalk improvements that are currently not provided on site.

The Wetland to the East of the property has a ½ acre to be mitigated, the remaining wetland along the East property line will be maintained and improved. The Mitigated wetland has been reviewed by Clean Water Services, The Department of State Lands, and the Army Corps of Engineers. This remaining wetland will include a 50’ buffer in which no site development may occur, putting additional constrain on where and how much site can be developed.

Tualatin Valley Fire and Rescue has reviewed the site for emergency vehicle access; it has been identified that access needs to be provided around the building and that portions of the onsite drive lane need to accommodate aerial apparatus. The result is a 26’ drive aisle around half of the building and 22’ around the remainder of the building.

The proposed development provides reasonable accommodation for fire access, a vehicle and bicycle parking ratio that is typical senior a senior use, and adequate outdoor amenity space for residence.

Site is zoned R-2 and has R-2 zones to the East and South of the property. The properties to the North and West are zoned for commercial use. Senior living facilities are ideal use's in sites like this as their resident/commercial function creates a buffer between these use types, their low trip generation reduces overburdening of streets.

A building height increase has been requested to allow the north wing of the proposed facility to gain a 4th story. This will allow the facility to meet the minimum and maximum densities required for the residential zone. The southern wing of the building will remain 3 stories and will not breach the zoning required 40’ max height. This was done to maintain a scale similar to southern neighboring property condos.

9. The proposal incorporates building, structure, or site design features or some combination thereof that compensate for the requested adjustment.

Response: The proposed adjustments allow for an efficient and compact layout of the building, good pedestrian and vehicular access to the site, and allows a portion of the exiting wetland to remain.
10. The proposal is consistent with all applicable provisions of Chapter 20 (Land Uses) unless applicable provisions are modified by means of one or more Adjustment, Variance, Planned Unit Development applications that already have been approved or are considered concurrently with the subject proposal.

Response: Beaverton Senior Living Community is consistent with all provisions of Chapter 20, with exception to the Building Height, vehicular parking count, and bicycle parking counts. Please see narrative for detail response of how project meets chapter 20 provisions and major modification provisions.

11. The proposal is consistent with all applicable provisions of Chapter 60 (Special Requirements) and that all improvements, dedications, or both required by the applicable provisions of Chapter 60 (Special Requirements) are provided or can be provided in rough proportion to the identified impact(s) of the proposal.

Response: Beaverton Senior Living Community is consistent with all provisions of Chapter 60, with exception to the Building Height, vehicular parking count, Tree plan 2, and bicycle parking counts. Please see approval criteria provided in narrative for Design review 3, Conditional use, tree plan 2, loading determination, and other major modifications for additional details.

12. Adequate means are provided or can be provided to ensure continued periodic maintenance and necessary normal replacement of the following private common facilities and areas: drainage ditches, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas and other facilities, not subject to periodic maintenance by the City or other public agency.

Response: Beaverton Senior Living Community will provide adequate means to ensure the continued periodic maintenances and periodic replacement of the following private common facilities and areas: drainage ditches, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas and other facilities, not subject to periodic maintenance by the City or other public agency.

13. The proposal does not include any lot area averaging as specified in Section 20.05.50.1.B. or include any lot dimension reductions as specified in Sections 20.05.50.2.A.2 and .4 or 20.05.50.2.B.2 and .4.

Response: Beaverton Senior Living Community does not utilize lot averaging.

14. Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.

Response: The following applications have been submitted concurrently to the city for review: Type Three Review, New Conditional Use, Major Adjustment for height,
Major Adjustment for parking, Loading determination, Tree Plan Type 2, and Property Line Replat Type 1.
40.15 Conditional Use

40.15.15 Application

There are four (4) Conditional Use applications which are as follows: Minor Modification of a Conditional Use, Major Modification of a Conditional Use, New Conditional Use, and Planned Unit Development.

Response: Beaverton Senior Living Community complies with requirements of New Conditional Use for the assisted living and memory care units.


A. Threshold. An application for a New Conditional Use shall be required when the following threshold applies:

Response: Beaverton Senior Living Community will comply with New Conditional Use application requirements for assisted living and memory care units. This meets the #1 threshold requirements as the assisted living and memory care use are conditionally permitted in the R-2 zone. Applications for New Conditional Use will be submitted concurrently with Type 3 review application.

B. Procedure Type. The Type 3 procedure, as described in Section 50.45. of this Code, shall apply to an application for a New Conditional Use. The decision-making authority is the Planning Commission.

Response: Beaverton Senior Living Community will comply with the procedures described in 50.45.

C. Approval Criteria. In order to approve a New Conditional Use application, the decision-making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

1. The proposal satisfies the threshold requirements for a Conditional Use application.

Response: Beaverton Senior living community satisfies the thresholds established in Beaverton Development Code chapter 40.15.15 for a new conditional use.
New Conditional Use will be submitted concurrently with Type 3 review application.

2. **All City application fees related to the application under consideration by the decision making authority have been submitted.**

**Response:** Fees have been submitted along with the application for a New Conditional Use.

3. **The proposal will comply with the applicable policies of the Comprehensive Plan.**

**Response:** See attached written statement provided with type 3 application submission for detailed response of Beaverton Senior Living Communities compliance with Section 60.05.35 through 60.05.50.

4. **The size, dimensions, configuration, and topography of the site and natural and man-made features on the site can reasonably accommodate the proposal.**

**Response:** New proposed development will be centrally located on site. A fire access road provides access around the entirety of the building. A wetland and 50' buffer on the East side of the property, this provides separation of the building from the neighboring single-story residential properties.

To the south of the proposed building a 24' landscaping buffer, 22' drive aisle separate, 5' sidewalk separate this development from the neighboring condos.

Along NW 185th avenue Washington county has increased the right-of-way dedication from 55' to 67' from center of road. The improvements along NW 185th will meet Washington county’s standards up to the curb, after which city standards will take precedence and result in new 6” curb, 7’ landscape buffer, and 6’ of new sidewalk. In addition, an area of landscaping with fencing and/or vegetative screening is proposed between the parking stalls and the street reduce headlight glare onto the street.

Along NW Walker road Washington county has increased the right-of-way dedication from 55’ from center of road. The improvements along NW Walker road will meet Washington county's standards up to the curb, after which city standards will take precedence and result in new 6” curb, 7’ landscape buffer, and 6’ of new sidewalk. In addition, an area of landscaping with vegetative screening is proposed between the parking stalls/drive aisle and Walker road to reduce headlight glare onto the street.

Other site features provided on site include standard, parallel, and accessible parking, an accessible sidewalk that provides access around the site. Additional landscaping areas around the exterior of the building, and two large exterior courtyards for resident.

Existing on site consists of a single-story residence along 185th avenue that will be demolished. Existing grades on site are primarily low sloping on the West half of the site, with all steeper slopes existing in the wetland area on the East half of the site (outside of the proposed building area). ½ Acre of the wetland will be mitigated...
through a wetland mitigation bank, the remaining wetland along the East property line will remain as is or will be improved per Clean Water Services standards.

5. The location, size, and functional characteristics of the proposal are such that it can be made reasonably compatible with and have a minimal impact on livability and appropriate use and development of properties in the surrounding area of the subject site.

Response: The assisted living and memory care facilities having both a residential and commercial aspect tend to fit in well at along the boundaries between residential and commercial zones. This site is zoned R-2, medium density residential, allows for apartment type and scale building. The proposed project includes independent living units that meet the density requirements of the R-2 zone. The assisted living and memory care units proposed allow for a building that has a residential feel and scale, while providing internal amenities for the residents. Due to the nature of senior living facilities and the age of occupants, in comparison to typical apartments, the demand on public amenities and overall traffic demands are reduced.

6. Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.

Response: Beaverton Senior Living Community is submitting the following applications Conditional Use, Major Modifications for height, Bicycle parking count, vehicle parking count, Loading Determination, Tree Plan Type 2, and Property Line Replat applications have been submitted concurrently with the Type 3 application.

D. Submission Requirements. An application for a Conditional Use shall be made by the owner of the subject property, or the owner’s authorized agent, on a form provided by the Director and shall be filed with the Director. The Conditional Use application shall be accompanied by the information required by the application form, and by Section 50.25. (Application Completeness), and any other information identified through a Pre-Application Conference.

Response: Beaverton Senior Living Community complies with submission requirements, see attached application.
40.20 Design Review

40.20.15.3 Design Review Three

A. Threshold. An application for Design Review Three shall be required when an application is subject to applicable design guidelines and one or more of the following thresholds describe the proposal:

2. New construction or addition of more than 30,000 gross square feet of non-residential floor area where the development abuts or is located within any Residential zoning district.

Response: Beaverton Senior Living Community complies with Threshold #2, has over 30,000 gross square feet of non-residential floor area and is in a residential zoning district.

B. Procedure Type. The Type 3 procedure, as described in Section 50.45. of this Code, shall apply to an application for Design Review Three. The decision-making authority is the Planning Commission.

Response: Beaverton Senior Living Community will comply with the procedures described in 50.45.

C. Approval Criteria. [ORD 4365; October 2005] In order to approve a Design Review Three application, the decision-making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

1. The proposal satisfies the threshold requirements for a Design Review Three application.

Response: Beaverton Senior living community satisfies the thresholds established in Beaverton Development Code chapter 40.20.15.3. for a design review three.

D. Submission Requirements.

An application for a Design Review Three shall be made by the owner of the subject property, or the owner’s authorized agent, on a form provided by the Director and shall be filed with the Director. The Design Review Three application shall be accompanied by the information required by the application form, and by Section 50.25. (Application Completeness), and any other information identified through a Pre-Application Conference.
Response: Beaverton Senior Living Community complies with submission requirements, see attached application.

2. All City application fees related to the application under consideration by the decision-making authority have been submitted.

Response: Fees have been submitted along with the application for a design review three.

3. For proposals meeting Design Review Three application thresholds numbers 1 through 6, the proposal is consistent with all applicable provisions of Sections 60.05.35 through 60.05.50

Response: See attached written statement provided with type 3 application submission for detailed response of Beaverton Senior Living Communities compliance with Section 60.05.35 through 60.05.50.

4. For additions to or modifications of existing development, the proposal is consistent with all applicable provisions of Sections 60.05.35 through 60.05.50 (Design Guidelines) or can demonstrate that the additions or modifications are moving towards compliance of specific Design Guidelines if any of the following conditions exist:
   a. A physical obstacle such as topography or natural feature exists and prevents the full implementation of the applicable guideline; or
   b. The location of existing structural improvements prevents the full implementation of the applicable guideline; or
   c. The location of the existing structure to be modified is more than 300 feet from a public street.

Response: Beaverton Senior Living Community can demonstrate that an existing wetland on the site has placed unique obstacles that will require major modifications to the building height and parking count, along with a loading determination. Conditional Use, Major Modifications, Loading Determination, Tree Plan Type 2, and Property Line Replat applications have been submitted concurrently with the Type 3 application.

5. For DRBCP proposals which involve the phasing of required floor area, the proposed project shall demonstrate how future development of the site, to the minimum development standards established in this Code or greater, can be realistically achieved at ultimate build out of the DRBCP.

Response: This provision is not applicable to the Beaverton Senior Living Community project.

6. For proposals meeting Design Review Three application Threshold numbers 7 or 8, where the applicant has decided to address a combination of standards and guidelines, the proposal is consistent with all applicable provisions of Sections 60.05.15 through 60.05.30 (Design Standards) except for the Design Standard(s) where the proposal is instead subject to the applicable corresponding Design Guideline(s).
Response: Criterion #6 is not applicable to the scope of this project; project utilizes threshold #2.

7. For proposals meeting Design Review Three Application Threshold numbers 7 or 8, where the applicant has decided to address Design Guidelines only, the proposal is consistent with the applicable provisions of Sections 60.05.35 through 60.05.50 (Design Guidelines).

Response: Criterion #6 is not applicable to the scope of this project; project utilizes threshold #2.

8. Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.

Response: Beaverton Senior Living Community is submitting the following applications: Conditional Use, Major Modifications for height and parking county, Loading Determination, Tree Plan Type 2, and Property Line Replat applications have been submitted concurrently with the Type 3 application.

D. Submission Requirements.

An application for a Design Review Three shall be made by the owner of the subject property, or the owner’s authorized agent, on a form provided by the Director and shall be filed with the Director. The Design Review Three application shall be accompanied by the information required by the application form, and by Section 50.25. (Application Completeness), and any other information identified through a Pre-Application Conference.

Response: Beaverton Senior Living Community complies with submission requirements, see attached application.
40.45 Land Division and Reconfiguration

40.45.15.2 Replat One

A. Threshold. An application for Replat One shall be required when any of the following thresholds apply: [ORD 4584; June 2012]

1. The reconfiguration of lots, parcels, or tracts within a single existing plat that decreases or consolidates the number of lots, parcels, or tracts in the plat; [ORD 4584; June 2012]

2. The creation of a plat for land that has never been part of a previously recorded plat where no new lots or parcels are proposed. [ORD 4584; June 2012]

Response: Developments meets threshold #2: the creation of a plat for land that has never been part of a previously recorded plat where no new lots or parcels are proposed. The three proposed lots meet threshold 2 criteria, complies.

B. Procedure Type. The Type 1 procedure, as described in Section 50.35. of this Code, shall apply to an application for Replat involving only the consolidation of lots and not triggering any of the thresholds in Section 40.45.15.3.A.1. through 40.45.15.3.A.3. The decision-making authority is the Director. [ORD 4584; June 2012]

Response: Development will be reviewed under Type 3 procedures, which exceed the procedures required in a Type 1. Development complies.

C. Approval Criteria. In order to approve a Replat One application, the decision-making authority shall make findings based on evidence provided by the applicant demonstrating that all the following criteria are satisfied.

1. The application satisfies the threshold requirements for a Replat One. [ORD 4584; June 2012]

Response: Beaverton Senior living community satisfies the thresholds established in Beaverton Development Code chapter 40.45.15.2.C.1-10 for a replat for lot consolidation. Developments meets threshold #2: the creation of a plat for land that has never been part of a previously recorded plat where no new lots or parcels are proposed. The three proposed lots meet threshold 2 criteria, complies.

2. All City application fees related to the application under consideration by the decision-making authority have been submitted.

Response: Fees have been submitted along with the application for replat type 1.

3. The proposed Replat does not conflict with any existing City approval, except the City may modify prior approvals through the Replat process to comply with current Code standards and requirements.

Response: The proposed replat does not conflict with any existing city approval and will comply with current codes and standards.
5. Oversized lots or parcels (“oversized lots”) resulting from the Replat shall have a size and shape that facilitates the future potential partitioning or subdividing of such oversized lots in accordance with the requirements of the Development Code. In addition, streets, driveways, and utilities shall be sufficient to serve the proposed lots and future potential development on oversized lots. Easements and rights-of-way shall either exist or be proposed to be created such that future partitioning or subdividing is not precluded or hindered, for either the oversized lot or any affected adjacent lot. [ORD 4584; June 2012]

Response: Lots to be consolidated will serve the Beaverton Senior Living development, no subdivision will be required. Oversized lot requirements not applicable to scope of project.

5. Applications that apply the lot area averaging standards of Section 20.05.15.D. shall demonstrate that the resulting land division facilitates the following: [ORD 4584; June 2012]

   a. Preserves a designated Historic Resource or Significant Natural Resource (Tree, Grove, Riparian Area, Wetland, or similar resource); or,

   b. Complies with minimum density requirements of the Development Code, provides appropriate lot size transitions adjacent to differently zoned properties, minimizes grading impacts on adjacent properties, and where a street is proposed, provides a standard street cross section with sidewalks. [ORD 4584; June 2012]

Response: The proposed development and lot consolidations will meet the minimum density requirements defined by R-2 zone as outlined in the Community Development Code. Consolidated lot will comply with zoning defined setback along all property lines. A ½ Acre of the wetland, located on the east property line, will be maintained per clean water services standards. This wetland, including a 50’ buffer will maintain existing grading at the East property line. The drive lane has been pulled away from the south property line 24’ to reduce grading impacts to adjacent neighbors and meet zoning required grading adjacent to neighboring properties. Property lines to the North and West parallel NW 185th avenue and NW Walker road. Development along these will meet Washington county and city Street and landscape requirements. Development complies with requirements.

6. Applications that apply the lot area averaging standards of Section 20.05.15.D. shall not require further Adjustment or Variance approvals for the Land Division. [ORD 4584; June 2012]

Response: Development Code 20.05.50.1.B is not applicable to the scope of this project.
7. If phasing is requested by the applicant, the requested phasing plan meets all applicable City standards and provides for necessary public improvements for each phase as the project develops.

**Response:** Phasing is not currently part of the scope of this development, standard not applicable to development.

8. The proposal will not eliminate pedestrian, utility service, or vehicle access to the affected properties. [ORD 4584; June 2012]

**Response:** Existing site access is limited, and existing sidewalk does not meet city or Washington county standards. New proposed access and sidewalks will comply with city and county standards, providing additional pedestrian and vehicle access to the site. Development complies with standard.

9. The proposal does not create a parcel or lot which will have more than one (1) zoning designation.

**Response:** All lots are currently zoned R-2, new proposed consolidated lot will maintain R-2 zoning designation. Complies with standard.

10. Applications and documents related to the request requiring further City approval shall be submitted to the City in the proper sequence.

**Response:** All applications and documents required by the city for review and approval will be submitted per city requirements. Complies with standard.
40.50 Loading Determination

40.50.15 Application

A. Threshold. An application for Loading Determination shall be required when one or more of the following thresholds apply:

Response: Application is requesting a modification to the dimensions of a required off-street loading spaced as listed in Section 60.25 (threshold).

B. Procedure Type. The Type 2 procedure, as described in Section 50.40. of this Code, shall apply to an application for Loading Determination. The decision-making authority is the Director.

Response: Application will be reviewed under a Type 3 review which exceed the requirements of the Type 2 procedure, complies.

A. Approval Criteria. In order to approve a Loading Determination application, the decision-making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

1. The proposal satisfies the threshold requirements for a Loading Determination application.

Response: Beaverton Senior living community satisfies the thresholds established in Beaverton Development Code chapter 40.50.15 for a Loading Determination for dimensions requirements for loading area. This proposal accounts for a primary loading area in the back of the building that will meet the dimensional loading requirements. The front entry to be considered a secondary loading area. Due to the unique site constraint brought on by the Vegetated Corridor, the expansion of NW 185th Avenue and fire access drive aisle increased from 24’ to 26’ North and East aspects of the building, the loading dimensions at the front entry have been reduced. Typical drop off will be by box truck only, allowing for a reduced size to the loading area. Please see attached written statement and site plan for additional information.

2. All City application fees related to the application under consideration by the decision-making authority have been submitted.

Response: Fees have been submitted along with the application for a Loading Determination.

3. The determination will not create adverse impacts, taking into account the total gross floor area and the hours of operation of the use.

Response: Beaverton Senior Living Community can demonstrate that the decreased loading area size and the use of the front entry as a secondary loading area will not have adverse impacts on the local area. The primary loading area is located on the back of the building, away from the Arterial streets. The Vegetated Corridor buffers the loading area from neighboring residence reducing the impacts on the local community. Loading area to be typically used during normal business hours.
4. There are safe and efficient vehicular and pedestrian circulation patterns within the boundaries of the site and in connecting with the surrounding circulation system.

Response: Beaverton Senior Living Community provides for safe and efficient vehicular and pedestrian circulation patterns within the boundaries of the site. Please see attached site plan for additional information.

5. The proposal will be able to reasonably accommodate the off-street loading needs of the structure.

Response: The proposal will reasonably accommodate the off-street loading needs of the structure. The loading location in the back of the building is directly tied to the main back-of-house circulation patterns of the building, allowing for quick and efficient loading and unloading of the box trucks delivering to the site.

6. The proposal is consistent with all applicable provisions of Chapter 60 (Special Requirements) and that all improvements, dedications, or both required by the applicable provisions of Chapter 60 (Special Requirements) are provided or can be provided in rough proportion to the identified impact(s) of the proposal.

Response: The proposal is consistent with the provisions of Chapter 60 of the development code, please see attached written statement for additional information.

7. Adequate means are provided or can be provided to ensure continued periodic maintenance and necessary normal replacement of the following private common facilities and areas: drainage ditches, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas and other facilities, not subject to periodic maintenance by the City or other public agency.

Response: Beaverton Senior Living Community will provide adequate means to ensure the continued periodic maintenance and periodic replacement of the following private common facilities and areas: drainage ditches, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas and other facilities, not subject to periodic maintenance by the City or other public agency.

8. The proposal contains all applicable application submittal requirements as specified in Section 50.25.1 of the Development Code.

Response: The proposal contains all applicable application submittal requirements as defined in 50.25.1 of the development codes, please see attached application and forms.

9. Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.
Response: The following applications have been submitted concurrently to the city for review: Type Three Review, New Conditional Use, Major Adjustment for height, Major Adjustment for parking, Loading determination, Tree Plan Type 2, and Property Line Replat Type 1.

D. Submission Requirements. An application for a Loading Determination shall be made by the owner of the subject property, or the owner's authorized agent, on a form provided by the Director and shall be filed with the Director. The Loading Determination application shall be accompanied by the information required by the application form, and by Section 50.25. (Application Completeness), and any other information identified through a Pre-Application Conference.

Response: All applications and documents required by the city for review and approval will be submitted per city requirements. Complies with standard.
40.90 Tree Plan Two

40.50.15 Application

A. Threshold. An application for Tree Plan Two shall be required when none of the actions listed in Section 40.90.10. apply, none of the thresholds listed in Section 40.90.15.1. apply, and one or more of the following thresholds apply:

Response: Application for threshold #4, removal of a Significant Individual Tree(S).

B. Procedure Type. The Type 2 procedure, as described in Section 50.40. of this Code, shall apply to an application for Tree Plan Two. The decision-making authority is the Director.

Response: Application will be reviewed under a Type 3 review which exceed the requirements of the Type 2 procedure, complies.

B. Approval Criteria. In order to approve a Tree Plan Two application, the decision-making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

1. The proposal satisfies the threshold requirements for a Tree Plan Two application.

Response: Beaverton Senior living community satisfies the thresholds established in Beaverton Development Code chapter 40.90.15.2.

2. All City application fees related to the application under consideration by the decision-making authority have been submitted.

Response: Fees have been submitted along with the application for a design review three.

3. If applicable, removal of any tree is necessary to observe good forestry practices according to recognized American National Standards Institute (ANSI) A300-1995 standards and International Society of Arborists (ISA) standards on the subject.

Response: Please see Landscape drawings for compliance.

4. If applicable, removal of any tree is necessary to accommodate physical development where no reasonable alternative exists.

Response: Trees have been removed along NW 185th Avenue to allow for road expansion. New trees will be planted in landscape buffer in accordance to city standards, please see attached landscape plans.

5. If applicable, removal of any tree is necessary because it has become a nuisance by virtue of damage to property or improvements, either public or private, on the subject site or adjacent sites.

Response: This provision will be applied if found applicable for proposed project.
6. If applicable, removal is necessary to accomplish public purposes, such as installation of public utilities, street widening, and similar needs, where no reasonable alternative exists without significantly increasing public costs or reducing safety.

**Response:** Trees have been removed along NW 185th Avenue to allow for road expansion. New trees will be planted in landscape buffer in accordance to city standards.

7. If applicable, removal of any tree is necessary to enhance the health of the tree, grove, SNRA, or adjacent trees to eliminate conflicts with structures or vehicles.

**Response:** This provision will be applied if found applicable for proposed project.

8. If applicable, removal of any tree(s) within a SNRA or Significant Grove will not result in a reversal of the original determination that the SNRA or Significant Grove is significant based on criteria used in making the original significance determination.

**Response:** This provision will be applied if found applicable for proposed project.

9. If applicable, removal of a tree(s) within a SNRA or Significant Grove will not result in the remaining trees posing a safety hazard due to the effects of windthrow.

**Response:** This provision will be applied if found applicable for proposed project.

10. The proposal is consistent with all applicable provisions of Section 60.60 Trees and Vegetation and Section 60.67 Significant Natural Resources.

**Response:** This proposal is consistent with all applicable provisions of 60.60 and 60.67, please see attached written statement and landscape plans for further clarification.

11. Grading and contouring of the site is designed to accommodate the proposed use and to mitigate adverse effect(s) on neighboring properties, public right-of-way, surface drainage, water storage facilities, and the public storm drainage system.

**Response:** Please see attached written statement and civil plans for clarification on grading affects adjacent to neighboring properties and public right-of-way.

12. The proposal contains all applicable application submittal requirements as specified in Section 50.25.1 of the Development Code.

**Response:** Attached application and documentation contains all submittal requirements as defined in 50.25.1.

13. Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.
Response: The following applications have been submitted concurrently to the city for review: Type Three Review, New Conditional Use, Major Adjustment for height, Major Adjustment for parking, Loading determination, and Property Line Replat Type 1.
Chapter 60 – Special Requirements

60.05.35 Building Design and Orientation Guidelines

1. Building articulation and variety

A. Residential buildings should be of a limited length in order to avoid undifferentiated building elevations, reduce the mass of individual buildings, and create a scale of development that is pedestrian friendly and allow circulation between buildings by pedestrians.

Response: Beaverton Senior Living Community utilizes building articulation to minimize the perceived mass of the building. Along NW 185th Avenue we have 3 major building volumes with varying color and materials. Recessed resident decks support a more residential feel.

B. Building elevations should be varied and articulated to provide visual interest to pedestrians. Within larger projects, variations in architectural elements such as: building elevations, roof levels, architectural features, and exterior finishes should be provided.

Response: Beaverton Senior Living Community utilizes building articulation to minimize the perceived mass of the building. Along NW 185th Avenue we have 3 major façade shifts with recessed resident decks that support a more residential feel. In addition, exterior finishes also vary between the 1st floor and above floors, further reducing perceived mass and height of the building.

C. To balance horizontal features on longer building elevations, vertical building elements, such as building entries, should be emphasized.

Response: Vertical siding articulation and depth changes break up the larger horizontal features of the building. Building entry is emphasized with covered drop off element and differentiation of color and material.

D. Buildings should promote and enhance a comfortable pedestrian scale and orientation.

Response: The building’s exterior circulation paths provide adjacent landscaping to create a comfortable separation of pedestrians from the building. The 1st floor cladding panels are a smaller scale to provide a more approachable and pedestrian feel. Additionally, the drop off area provides a plaza space for people to congregate.

E. Building elevations visible from and within 200 feet of an adjacent street or major parking area should be articulated with architectural features such as windows, dormers, off-setting walls, alcoves, balconies or bays, or by other design features that reflect the building’s structural system. Undifferentiated
blank walls facing a street, common green, shared court, or major parking area should be avoided.

**Response:** All building facades provide a rhythmic window pattern along, off-setting walls, and resident decks.

F. Building elevations visible from and within 100 feet of an adjacent street where the principle use of the building is manufacturing, assembly, fabricating, processing, packing, storage and wholesale and distribution activities in an Industrial zoning district, should be articulated with architectural features such as windows, dormers, off-setting walls, alcoves, balconies or bays, or by other design features that reflect the building's structural system. Undifferentiated blank walls facing a street should be avoided.

**Response:** Not applicable to this project.

2. **Roof forms.**

   A. Roof forms should be distinctive and include variety and detail when viewed from the street. Sloped roofs should have a significant pitch and building focal points should be emphasized.

   **Response:** Beaverton Senior Living Community utilizes entrance canopies to create height variation in architectural elements. Color and depth changes that correspond to changes in parapet wall height further distinguish the flat roof and create additional visual interest.

   B. Flat roofs should include distinctive cornice treatments.

   **Response:** Beaverton Senior Living Community utilizes siding variation and siding depth to distinguish the flat roof and parapet areas. The variation of a panel façade with intermitted vertical interruptions aids in creating a distinctive cornice treatment.

   C. Additions to existing structures which involve the addition of new roof area should respect the roof form and material of the existing structure.

   **Response:** Not applicable to this project.

3. **Primary Building Entrances.**

   A. The design of buildings should incorporate features such as arcades, roofs, porches, alcoves, porticoes, awnings, and canopies to protect pedestrians from the rain and sun.
Response: Beaverton Senior Living Community provides building entrance canopies and complies with guidelines.

B. Special attention should be given to designing a primary building entrance that is both attractive and functional. Primary entrances should incorporate changes in mass, surface, or finish to emphasize the entrance.

Response: Beaverton Senior Living Community provides a building entrance with visual interest through architectural features such as a custom canopy, storefront glazing, building shifts (emphasizing the entrance), along with a large vertical cladding system that stands out from surrounding panelized cladding.


A. Exterior building materials and finishes should convey an impression of permanence and durability. Materials such as masonry, stone, wood, terra cotta, and tile are encouraged. Windows are also encouraged, where they allow views to interior activity areas or displays.

Response: Beaverton Senior Living Community provide materials at a scale where a sense of permanence and durability, through the use a panelized siding. Ample windows are provided on the exterior façade and on the interior façade looking out to courtyard.

B. Where masonry is used, decorative patterns (other than running bond pattern) should be provided, especially at entrances, building corners and at the pedestrian level. These decorative patterns may include multi-colored masonry units, such as brick, tile, stone, or cast stone, in a layered or geometric pattern, or multi-colored ceramic tile bands used in conjunction with materials such as concrete.

Response: Not applicable as no masonry is used on the exterior of the building.

5. Screening of equipment.

All roof, surface, and wall-mounted mechanical, electrical, communications, and service equipment should be screened from view from adjacent public streets by the use of parapets, walls, fences, enclosures, dense evergreen foliage, or by other suitable means.

Response: Beaverton Senior Living Community will have parapet walls surround the whole roof boundary to assist in screening roof top mechanical equipment. Transformers along with any other site place utility equipment will be enclosed by fence or dense evergreen foliage; complying with design guidelines.

6. Building location and orientation in Commercial and Multiple Use zones.
7. Building scale along Major Pedestrian Routes.

Response: Not applicable for this project as this building is not along a major pedestrian route and is not located within a right of way.

8. Ground floor elevations on commercial and multiple use buildings.

Response: Not applicable for this project as this is a residential building.

9. Compact Detached Housing design.

Response: Not applicable for this project as this building is not a compact detached housing design.

60.05.40 Circulation and Parking Design Guidelines

1. Connections to public street system

The on-site pedestrian, bicycle, and motor vehicle circulation system and the abutting street system should provide for efficient access and circulation; and should connect the project to abutting streets in accordance with connections identified in Tables 6.1 through 6.6 and Figures 6.1 through 6.23 of the Comprehensive Plan.

Response: Beaverton Senior Living Community has been working with Washington County and the City of Beaverton to allow site access to provide efficient access to the site while supporting the NW 185th Avenue and NW Walker Road lane expansion project. As discussed with Washington County, the adjacent arterial streets will meet Washington County A-1 Arterial standards up to the curb. City of Beaverton standards will take precedence from the curb into the site, which includes an updated landscape buffer and new sidewalk that allow pedestrian access to the site in and around.

2. Loading area, solid waste facilities, and similar improvements.

A. On-Site service, storage and similar activities should be designed and located so that these facilities are screened from an abutting public street.

Response: Service, storage, and loading are primarily located on the back of the building, away from public streets. Beaverton Senior Living Community complies with Guidelines. Beaverton Senior Living Community has proposed that the front entry be considered the secondary loading berth and is to be used for box trucks or smaller, and only when the back-loading area is unavailable. An application for loading determination has been submitted to be reviewed concurrently with both Design Review III and Conditional Use Permits.
B. Except in Industrial districts, loading areas should be designed and located so that these facilities are screened from an abutting public street, or are shown to be compatible with local business operations.

**Response:** All Service, storage, and loading are located on the back of the building, away from public streets. Beaverton Senior Living Community complies with Guidelines.

3. **Pedestrian circulation.**
   A. Pedestrian connections should be made between on-site buildings, parking areas, and open spaces.

   **Response:** Pedestrian connections have been made between onsite buildings and parking areas with the use of sidewalks around ¾ of the building. Cross walks have been coordinated to provide on the North, East, and West parking lot areas to connect parking areas to the internal circulation paths around the building. See below for diagram of cross walks and building access points.
B. Pedestrian connections should connect on-site facilities to abutting pedestrian facilities and streets unless separated by barriers such as natural features, topographical conditions, or structures.

**Response:** Pedestrian connections have been made between onsite buildings adjacent public sidewalks. Pedestrian circulation on site will be ADA compliant. 1 new pedestrian circulation connection will connect the site with the new sidewalk proposed along NW 185th avenue. Two new pedestrian circulation connections will connect the site with the new sidewalk proposed along NW Walker road. See below for indication of new pedestrian connections; building complies.

C. Pedestrian connections should link building entrances to nearby streets and other pedestrian destinations.

**Response:** Pedestrian connections have been made between onsite buildings adjacent public sidewalks; Cross walks have been coordinated to provide on the North, East, and West parking lot areas to connect parking areas and public sidewalks to the internal circulation paths around the building. See below for diagram of cross walks and building access points. building complies.
D. Pedestrian connections to streets through parking areas should be evenly spaced and separated from vehicles.

Response: Cross walks have been coordinated to provide on the North, East, and West parking lot areas to connect parking areas and public sidewalks to the internal circulation paths around the building. Cross walks are spaced to simplify wayfinding to the primary entrances of the building, while providing convenient connection to the site. Cross walks are located to provide offset from the vehicular site access points; this provides motorist time to enter the site before having to respond to pedestrians crossing the drive aisles. The building complies.

E. Excluding manufacturing, assembly, fabricating, processing, packing, storage and wholesale and distribution activities which are the principle use of a building in Industrial districts, pedestrian connections designed for high levels of pedestrian activity should be provided along all streets.

Response: Sidewalks and landscaping along NW 185th and NW Walker road will be brought up to city standards. The city standards will require that this will include a 6" curb demising the arterials streets from the pedestrian traffic,
followed by a 7’ landscape buffer and then a 6’ pedestrian sidewalk. All infrastructure will be new as it is part of the Washington count right or way expansion projects along NW 185th avenue and NW Walker road. Building complies.

F. Pedestrian connections should be designed for safe pedestrian movement and constructed of hard durable surfaces.

Response: Pedestrian connections have been designed for safe pedestrian movement, with striped markings anywhere access crosses a drive aisle, and all site access will also comply with accessibility standards. Pedestrian cross walks will be constructed to city engineering standards, constructed of hard durable surfaces that can withstand day to day wear and tear along with large weights imposed by emergency vehicles, waste collection vehicles and box style delivery trucks.

4. Street frontages and parking areas.
Landscape or other screening should be provided when surface parking areas are located along public streets.

Response: Per a conversation with the City of Beaverton, a fence will screen NW 185th Avenue from the abutting parking.

5. Parking area landscaping.
Landscape islands and a tree canopy should be provided to minimize the visual impact of large parking areas.

Response: Beaverton Senior Living community will provide landscaping and trees along NW 185th Avenue, landscaped parking islands at every 10-12 parking stalls to reduce the visual impact of the parking area. Additional shrubs and landscaping will be provided adjacent to the building to further reduce the visual impact of the parking and hardscaped area.

6. Off-Street parking frontages in Multiple Use zone.

Response: Not applicable to this building as this is a residential zone.

7. Sidewalks along streets and primary building elevations in Commercial and Multiple Use zones.

Response: Not applicable to this building as this is a residential zone.

8. Connect on-site buildings, parking, and other improvements with identifiable streets and drive aisles in Residential, Commercial and Multiple Use zones.
Response: Beaverton Senior Living Community will have easily recognized vehicle circulation, curbs, sidewalks and landscaping. Landscaping will be provided to buffer the property from the street, the building from the sidewalk, and will landscaped parking islands to break up the parking aisles.

9. Parking structures in Multiple Use zones.
Active ground floor uses should be incorporated in parking structures, particularly on street level elevations facing Major Pedestrian Routes.

Response: Not applicable as no parking structures are provided.

60.05.45 Landscape, Open Space and Natural Areas Design Guidelines.

Unless otherwise noted, all guidelines apply in all zoning districts.

1. Common open space for residential uses in Residential zones.

A. Common open spaces should be provided that are sized and designed for anticipated users and are located within walking distance for residents and visitors and should be integrated into the overall landscape plan.

Response: This building will provide two interior courtyards for resident use and are sized to meet the needs a facility of this size requires. The courtyards will have landscaping and vegetation along with circulation pathways and exterior seating. Additionally, the building will provide a roof deck amenity space. This project complies with design guideline.

B. Common open spaces should be available for both passive and active use by people of all ages and should be designed and located in order to maximize security, safety, and convenience.

Response: This building will provide two interior courtyards for resident use and are sized to meet the needs a facility of this size requires. The courtyards will have landscaping and vegetation along with circulation pathways and exterior seating allowing for passive or active use. This project complies with design guideline.

C. Common open spaces should be free from all structural encroachments unless a structure is incorporated into the design of the common open space such as a play structure.

Response: This building's courtyards will be free from all structural encroachments except those that are design into the common open space.

D. Common open space should be located so that windows from living areas, excluding bedrooms and bathrooms, of a minimum of four (4) residences face on to the common open space.

Response: Both courtyards have more than 4 living spaces facing the open space. This building's common open space complies with requirement.

A. Landscape treatments utilizing plants, hard-surface materials, or both should be provided in the setback between a street and a building. The treatment should enhance architectural elements of the building and contribute to a safe, interesting streetscape.

**Response:** This building design will have a 7'-0" landscape buffer between the curb and the 6'-0" sidewalk on both NW 185th Avenue and NW Walker Road. This landscape buffer will have new trees and vegetation.

B. Landscaping should soften the edges of buildings and parking areas, add aesthetic interest, and generally increase the attractiveness of a development and its surroundings.

**Response:** This building design will have a 7'-0" landscape buffer between the curb and the 6'-0" sidewalk on both NW 185th Avenue and NW Walker Road. This landscape buffer will have new trees and vegetation. Landscaping will be provided around the perimeter of the building and intermittently between parking bays to add aesthetic interest, see site plan and landscape plans for additional information. A landscape buffer is provided along the south property line to screen the new facility from existing development.


A. Landscaping should soften the edges of buildings and parking areas, add aesthetic interest, and generally increase the attractiveness of a development and its surroundings.

**Response:** This building design will have a 7'-0" landscape buffer between the curb and the 6'-0" sidewalk on both NW 185th Avenue and NW Walker Road. This landscape buffer will have new trees and vegetation. Landscaping will be provided around the perimeter of the building and intermittently between parking bays to add aesthetic interest, see site plan and landscape plans for additional information.

B. Plazas and common areas designed for pedestrian traffic should be surfaced with a combination of landscape and decorative pavers or decorative concrete.

**Response:** The interior courtyards and exterior seating areas will have a combination of landscaping and decorative concrete/pavers.

C. Use of native vegetation should be emphasized for compatibility with local and regional climatic conditions.

**Response:** The parking lot landscaping is comprised of a mix of Native and other trees, shrubs, and groundcover that is attractive and low maintenance. Following is a table listing the proposed native landscape materials.
### Parking Lot & Site Landscape

<table>
<thead>
<tr>
<th>Botanical Name</th>
<th>Common Name</th>
<th>Native</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Trees</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Malus X ‘Sugar Tyme’ TM</td>
<td>Sugar Tyme Crab Apple</td>
<td></td>
</tr>
<tr>
<td>Quercus Rubra</td>
<td>Red Oak</td>
<td></td>
</tr>
<tr>
<td>Ulmus Parvifolia <code>Homestead</code></td>
<td>Homestead Elm</td>
<td></td>
</tr>
<tr>
<td><strong>Shrub and Groundcover Planting</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Achillea Millefolium</td>
<td>Common Yarrow</td>
<td>X</td>
</tr>
<tr>
<td>Cornus Stolonifera</td>
<td>Dogwood</td>
<td>X</td>
</tr>
<tr>
<td>Dryopteris Filix-Mas</td>
<td>Male Fern</td>
<td>X</td>
</tr>
<tr>
<td>Gaultheria Shallon</td>
<td>Salal</td>
<td>X</td>
</tr>
<tr>
<td>Liriope Spicata</td>
<td>Creeping Lily Turf</td>
<td>X</td>
</tr>
<tr>
<td>Mahonia Repens</td>
<td>Creeping Mahonia</td>
<td>X</td>
</tr>
<tr>
<td>Mahonia X Media <code>Winter Sun</code></td>
<td>Mahonia Hybrid</td>
<td>X</td>
</tr>
<tr>
<td>Miscanthus Purpurascens</td>
<td>Silver Grass</td>
<td></td>
</tr>
<tr>
<td>Philadelphus Lewisii</td>
<td>Wild Mockorange</td>
<td>X</td>
</tr>
<tr>
<td>Polystichum Munitum</td>
<td>Western Sword Fern</td>
<td>X</td>
</tr>
<tr>
<td>Rosa Nootkana</td>
<td>Nootka Rose</td>
<td>X</td>
</tr>
<tr>
<td>Rubus Parviflorus</td>
<td>Thimbleberry</td>
<td>X</td>
</tr>
<tr>
<td>Rubus Pentalobus</td>
<td>Creeping Raspberry</td>
<td></td>
</tr>
<tr>
<td>Rudbeckia Fulgida <code>Goldstrum</code></td>
<td>Coneflower</td>
<td></td>
</tr>
<tr>
<td>Symphoricarpos Albus</td>
<td>Common White Snowberry</td>
<td>X</td>
</tr>
<tr>
<td><strong>Lawn</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Symphoricarpos Albus</td>
<td>Drought Tolerant Hydroseed or Sod, Tolerant of PNW Conditions</td>
<td>X</td>
</tr>
<tr>
<td><strong>L2 Landscape Buffer</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Abelia X Grandiflora</td>
<td>Glossy Abelia</td>
<td></td>
</tr>
<tr>
<td>Arctostaphylos Manzanita</td>
<td>Manzanita</td>
<td>X</td>
</tr>
<tr>
<td>Arctostaphylos Uva-Ursi</td>
<td>Kinnikinnick</td>
<td>X</td>
</tr>
<tr>
<td>Liriope Spicata <code>Big Blue</code></td>
<td>Creeping Lily Turf</td>
<td>X</td>
</tr>
<tr>
<td>Mahonia Aquifolium</td>
<td>Oregon Grape</td>
<td>X</td>
</tr>
<tr>
<td>Mahonia Nervosa</td>
<td>Oregon Grape</td>
<td>X</td>
</tr>
</tbody>
</table>

### Vegetated Corridor Enhancement

<table>
<thead>
<tr>
<th>Botanical Name</th>
<th>Common Name</th>
<th>Native</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Trees</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fraxinus Latifolia</td>
<td>Oregon Ash</td>
<td>X</td>
</tr>
<tr>
<td>Crataegus Douglasii</td>
<td>Pacific Hawthorn</td>
<td>X</td>
</tr>
<tr>
<td>Malus Fusca</td>
<td>Balsam Poplar</td>
<td>X</td>
</tr>
</tbody>
</table>
D. Existing mature trees and vegetation should be retained and incorporated, when possible, into the site design of a development.

**Response:** The site's trees are primarily in the vegetated corridor or wetland. All trees in the remaining vegetated corridor and/or wetland will be retained.

E. A diversity of tree and shrub species should be provided in required landscaped areas.

**Response:** The proposed design utilizes a variety of tree and shrub species.

4. Common Greens

A. Common greens should be designed to provide access for only pedestrians and bicycles to abutting properties. Common greens should also serve as a common open space amenity for residents.

**Response:** Common greens are not applicable to this project.

5. Shared Courts.

A. Shared courts should safely accommodate pedestrians and vehicles within the same circulation area and provide safe access to abutting properties. Special paving and other street elements should be designed to encourage slow vehicle speeds and to signify the shared court's intended use by pedestrians as well as vehicles.

**Response:** Shared courts are not applicable to this project.

6. Retaining walls.

Retaining walls over six feet in height or greater than fifty feet in length should be architecturally treated, incorporated into the overall landscape plan, or screened by landscape material.

**Response:** The modular block retaining wall south of the building will be split face blocks and incorporated into the overall landscape plan.

7. Fences and walls.

A. Fences and walls should be constructed of attractive, durable materials.
8. Changes to existing on-site surface contours at residential property lines.

The perimeters of properties should be graded in a manner to avoid conflicts with abutting residential properties such as drainage impacts, damage to tree root zones, and blocking sunlight.

Response: The perimeter of the property will be regraded, see civil drawings for grading and storm water management.

9. Integrate water quality, quantity, or both facilities.

Above-ground stormwater detention and treatment facilities should be integrated into the design of a development site and, if visible from a public street, should appear as a component of the landscape design.

Response: This does not apply; the project proposes that all stormwater detention and treatment facilities will be underground.

10. Natural areas.

Natural features that are indigenous to a development site, such as streams, wetlands, and mature trees should be preserved, enhanced and integrated when reasonably possible into the development plan.

Response: This project will mitigate ½ acre of the existing wetland and will preserve and improve remaining wetland and vegetated corridor areas per clean water services requirements. Trees within the wetland and vegetated corridor will be preserved, existing trees along NW 185th Avenue will be removed to allow for site access and parking.

11. Landscape buffering and screening.

A. A landscape buffer should provide landscape screening, and horizontal separation between different zoning districts and between non-residential land uses and residential land uses. The buffer should not be applicable along property lines where existing natural features such as floor plains, wetlands, riparian zones and identified significant groves already provide a high degree of visual screening.

Response: This building design will have a 7'-0" landscape buffer between the curb and the 6'-0" sidewalk on both NW 185th Avenue and NW Walker Road. This landscape buffer will have new trees and vegetation. In addition, a vegetation of adequate height and density and fencing will be added between the parking and NW 185th Avenue to provide horizontal screening. A landscaped buffer is provided along the south property line in front of the proposed retaining wall.

B. When potential impacts of a Conditional Use are determined or when potential conflicts of use exist between adjacent zoning districts such as industrial uses abutting residential uses, landscape screening should be dense, and the buffer width maximized. When potential conflicts of uses are not as great, such as a
commercial use abutting an industrial use, less dense landscape screening and narrower buffer width is appropriate.

Response: Properties to the North, South, and East are all residential and do not pose any potential conflicts. NW Walker Road and NW 185th Avenue buffer this property from the adjacent NH, R5 and Washington County zones. No potential conflicts exist.

C. Landscape buffering should consist of a variety of trees, shrubs and ground covers designed to screen potential conflict areas and complement the overall visual character of the development and adjacent neighborhood.

Response: There is a variety of trees, shrubs and ground covers between the building and the street as well as along the south property line to screen the project from the adjacent condominiums. See Landscaping Plans.

D. When changes to buffer widths and buffer standards are proposed, the applicant should describe the physical site constraints or unique building or site characteristics that merit width reduction.

Response: This section is not applicable to the project.

60.05.50 Lighting Design Guidelines.

Unless otherwise noted, all guidelines apply in all zoning districts.

1. Lighting should be utilized to maximize safety within a development through strategic placement of pole-mounted, non-pole mounted and bollard luminaires.

Response: Site lighting will be provided that will maximize safety with the development. See Lighting Plan

2. Pedestrian scale lighting should be an integral part of the design concept except for industrial projects. Poles and fixtures for pole-mounted lighting should be of a consistent type throughout the project. The design of wall-mounted lighting should be appropriate to the architectural design features of the building

Response: All pedestrian-scale on-site lighting will be of a consistent type through project. See Lighting Plan

3. Lighting should minimize direct and indirect glare impacts to abutting and adjacent properties and streets by incorporating lens shields, shades or other measures to screen the view of light sources from residences and streets.

Response: Any proposed lighting will minimize direct and indirect glare to residences and streets.

4. On-Site lighting should comply with the City’s Technical Lighting Standards. Where the proposal does not comply with Technical Lighting standards, the applicant should describe the unique circumstance attributed to the use or site where compliance with the standard is either infeasible or unnecessary.
Response: Any new lighting will comply with the City’s Technical Lighting Standards.

60.15 Land Division Standards.
60.15.10 Grading Standards.

1. The on-site surface contour grading standards specified in Section 60.15.10.3. are applicable to all land use proposals where grading is proposed, including land division proposals and design review proposals, as applicable. This Section does not supersede Section 60.05.25. (Design Review) and the exemptions listed in Section 60.15.10.2. will apply equally to design review proposals.

Response: The grading as required for the project’s site plan and the stormwater system design results in a retaining wall approximately fifteen feet from the south property line. Grading is not proposed within 10-feet of the south property line. The retaining wall height has been designed such that the resulting grade difference is within the allowed range specified by Grading Standard 60.15.10.3. See Grading plan and site cross section for additional information.

2. Exemptions. The following improvements will be exempted from the on-site surface contour grading standards specified in Section 60.15.10.3.

Response: None of the exemptions apply to the project.

3. On-site surface contouring. When grading a site within twenty-five (25) feet of a property line within or abutting any residentially zoned property, the on-site surface contours shall observe the following:

Response: Grading is not proposed within 10-feet of the south property line. The retaining wall height has been designed such that the resulting grade difference is within the allowed range specified by Grading Standard 60.15.10.3.

4. Notwithstanding the requirements of Section 60.15.10.3, above, grading within 25 feet of a significant tree or grove, where the tree is located on- or off-site, shall observe the following:

Response: The site does not contain any significant trees or groves.

60.15.15 Final Plat Standards.

1. Easements and rights-of-way.

Refer to Chapter 9.05 of the Beaverton Municipal Code and Chapter 1, Section 120 of the Beaverton Engineering Design Manual.

Response: This project will comply with the Beaverton Municipal code and Beaverton Engineering Design Manual.

2. Building lines.

The Director may approve special setbacks based upon the consideration for safety, topography, geology, solar access or other such reasons. If special building setback lines are to be established in the land division that are greater
than required by this Code, they shall be shown on the final land division and included in the deed restriction.

**Response:** Not applicable to this project.

3. **Dedications.**

Infrastructure or public improvements such as public streets, sidewalks, pedestrian ways, bikeways, multi-use paths, sanitary sewer, storm water system, water system, traffic control devices, parks, open space, and other public rights-of-way required as needed to serve the development, shall be installed at the expense of the developer and dedicated or otherwise conveyed to the City or the appropriate jurisdiction for maintenance. Dedication of any land for park or open space purposes must be approved by the jurisdiction to which the park or open space is being dedicated prior to Final Land Division approval.

**Response:** This project will comply with dedication requirements for the expansion of NW 185th Avenue and NW Walker Road and the dedications will be shown on the Plat Map prior to recording.

4. **Homeowners’ Associations and declarations.**

When a Homeowners’ Association Agreement or other restrictive covenants are to be recorded with the development, a copy of the appropriate documents shall be submitted with the final plat. The City shall review such documents to ensure that common areas are properly maintained and that other restrictions required by the City are included.

**Response:** Not applicable to this project.

5. **Monuments and benchmarks.**

The developer shall establish and designate monuments and benchmarks on the Final Plat.

**Response:** This project will comply.

6. **Street trees.**

Prior to City approval of the Final Plat, street trees shall be planted along street frontages in accordance with the following:

**Response:** This project will comply, please see Landscape Plan. In this case, the deferral of street tree installation would be appropriate to occur with site development and frontage improvements that are triggered by the project rather than the replat.

**60.25 Off-Street Loading Requirements.**

**60.25.10 Loading Berth Design.**

Required off-street loading space shall be provided in berths which conform to the following minimum specifications:
1. Type A berths shall be at least 60 feet long by 12 feet wide by 15 feet high, inside dimensions with a 60-foot maneuvering apron

Response: Type A berths are not required for this Residential Care Facility.

2. Type B berths shall be at least 30 feet long by 12 feet wide by 14 feet 6 inches high, inside dimensions with 30 feet maneuvering apron.

Response: Due to the large site restraints placed on this site due to wetland, and street dedications a loading determination application has been submitted to the City.

60.25.15 Number of Required Loading Spaces.

The following numbers and types of berths shall be provided for the specified uses. The uses specified below shall include all structures designed, intended or arranged for such use. In the case of a use not specifically mentioned, the requirements for off-street loading facilities shall be the same as a use which is most similar.

3. Hospitals, Residential Care Facilities. Over 100,000 SQ. FT. = 2 Berths Required = Type B.

Response: Due to the large site restraints placed on this site due to wetland, and street dedications a loading determination application has been submitted to the City. This application is request that the front entry be considered the second berth, with the primary larger birth located in the back of the building.

60.25.20 Loading Facilities Location.

1. The off-street loading facilities required for the uses mentioned in this Code shall be in all cases on the same lot or parcel of land as the structure they are intended to serve. In no case shall the required off street loading space be part of the area used to satisfy the off-street parking requirements.

Response: This project complies with loading location requirement. See the delivery truck turning plan.

2. No space for loading or unloading vehicles shall be so located that a vehicle using such loading space projects into any public street. Loading space shall be provided with access to any alley, or if no alley adjoins the lot, with access to a street. Any required front, side or rear yard may be used for loading unless otherwise prohibited by this Code.

Response: This project complies with loading location requirement.

60.25.25 Loading Determination.

Off-Street loading requirements may be modified pursuant to Section 40.50

Response: Due to the large site restraints placed on this site due to wetland, and street dedications a loading determination application has been submitted to the City pursuant to Section 40.50. It is requested that the front entry be considered
the second berth and that it can be of reduced size in comparison to the city berth standards for type B Berths.

60.30 Off-Street Parking.

60.30.05 Off-Street Parking Requirements.

Parking spaces shall be provided and satisfactorily maintained by the owner of the property for each building or use which is erected, enlarged, altered, or maintained in accordance with the requirements of Sections 60.30.05. to 60.30.20.

Response: Parking is provided and maintained by the owner of the property.

1. Availability.

Required parking spaces shall be available for parking operable passenger automobiles and bicycles of residents, customers, patrons and employees and shall not be used for storage of vehicles or materials or for parking of trucks used in conducting the business or use.

Response: This project will comply with parking availability requirements.

2. Vehicle Parking. Vehicle parking shall be required for all development proposed for approval after November 6, 1996 unless otherwise exempted by this ordinance. The number of required vehicle parking spaces shall be provided according to Section 60.30.10.5.

Response: The amount of vehicle parking required per Table 60.30.10.5.A for “Residential Care Facilities” is 0.5 per bed (at maximum capacity) for memory care and assisted living units and 1.25 FOR 1 bedroom and 1.5 for 2 bedroom attached dwelling units (assisted living units). Due to the site constraints imposed on this project from unique conditions of the wetland and right of way expansions, we are applying for a major modification to reduce the total parking required.

See detailed parking counts below:

<table>
<thead>
<tr>
<th>BUILDING</th>
<th>PARKING REQUIRED</th>
<th>PARKING PROVIDED</th>
</tr>
</thead>
<tbody>
<tr>
<td>34 Memory Care Beds</td>
<td>17 SPACES</td>
<td>130 Standard Spaces</td>
</tr>
<tr>
<td>Assisted Living Beds</td>
<td></td>
<td>5 Accessible Spaces</td>
</tr>
<tr>
<td>56 one beds and studio units</td>
<td>44 SPACES</td>
<td>11 Compact Spaces</td>
</tr>
<tr>
<td>16 two bedroom units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Independent Living</td>
<td></td>
<td></td>
</tr>
<tr>
<td>68 one beds and studios units</td>
<td>85 SPACES</td>
<td></td>
</tr>
<tr>
<td>32 two bedroom units</td>
<td>48 SPACES</td>
<td></td>
</tr>
<tr>
<td>TOTAL = 194 SPACES</td>
<td>TOTAL = 146 SPACES</td>
<td></td>
</tr>
</tbody>
</table>

Bicycle parking shall be required for all multi-family residential developments of four units or more, all retail, office and institution developments, and at all transit stations and park and ride lots which are proposed for approval after November 6, 1996. The number of required bicycle parking spaces shall be provided according to Section 60.30.10.5. All bike parking facilities shall meet the specifications, design and locational criteria as delineated in this section and the Engineering Design Manual.

**Response:** The amount of bicycle parking required per Table 60.30.10.5.B for “Multi dwelling structure containing 4 or more dwelling units” is 1 space/20 units for short term and 1 space/1 unit (based upon maximum capacity). The number of dwelling units is 91.

Therefore: \[
\frac{100}{20} = 5 \text{ Short Term Spaces Required} \\
\frac{100}{1} = 100 \text{ Long Term Spaces Required}
\]

Note 3: In calculating the required number of bicycle parking spaces, fractions equal or more than 0.5 shall be rounded up to the nearest whole number. Fractions less than 0.5 shall be rounded down to the nearest whole number.

**Response:** The amount of bicycle parking required per Table 60.30.10.5.B for “Residential Care Facilities” is 1 space/100 beds for short term and 1 space/50 beds long term (based upon maximum capacity). The number of beds is 128.

Therefore: \[
\frac{122}{100} = 1.22 \text{ spaces} = 1 \text{ Short Term} \\
\frac{122}{50} = 2.44 \text{ spaces} = 2 \text{ Long Term}
\]

Note 3: In calculating the required number of bicycle parking spaces, fractions equal or more than 0.5 shall be rounded up to the nearest whole number. Fractions less than 0.5 shall be rounded down to the nearest whole number.

This project requires 6 short term bike parking stalls and 102 long term bike parking stalls. A major modification will be submitted concurrently with the Design review and Conditional use review for a reduction of overall parking from the city’s requirements to 60 bicycle parking stalls.

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60.30.10 Number of Required Parking Spaces.

Except as otherwise provided under Section 60.30.10.11, off-street vehicle, bicycle, or both parking spaces shall be provided as follows:

1. **Parking Calculation.** Parking ratios are based on spaces per 1,000 square feet of gross floor area, unless otherwise noted.

2. **Parking Categories.**

A. **Vehicle Categories.** Contained in the table at Section 60.30.10.5. are vehicle parking ratios for minimum required parking spaces and maximum permitted number of vehicle parking spaces to be provided for each land use, except for...
those uses which are located in the RC-OT zoning district which are governed by Section 60.30.10.6. These requirements reflect the parking requirements of Title 4 of Metro’s Regional Transportation Functional Plan.

1. Minimum number of required parking spaces. For each listed land use, the City shall not require more than the minimum number of parking spaces calculated for each use.

B. Bicycle Categories. The required minimum number of short-term and long-term bicycle parking spaces for each land use is listed in Section 60.30.10.5.

1. Short-Team parking. Short-term bicycle parking spaces accommodate persons that can be expected to depart within two hours. Short-term bicycle parking is encouraged to be located on site within 50 feet of a primary entrance, or if there are site, setback, building design, or other constraints, bicycle parking shall be located no more than 100 feet from a primary entrance in the closest available area to the primary entrance as determined by the decision-making authority.

2. Long-Term parking. Long-term bicycle parking spaces accommodate persons that can be expected to leave their bicycle parked longer than two hours. Cover or shelter for long-term bicycle parking shall be provided. School buildings are exempted from the requirement to cover long-term bicycle parking.

3. Bicycle parking shall be designed, covered, located, and lighted to the standards of the Engineering Design Manual and Standard Drawings.

10. Location of Vehicle Parking.

A. All parking spaces provided shall be on the same lot upon which the use requiring the parking is located. Upon demonstration by the applicant that the required parking cannot be provided on the same lot upon which the use is located, the Director may permit the required parking spaces to be located on any lot within 200 feet of the lot upon which the use requiring the parking is located.

Response: All the parking space provided are on the same lot upon which the use requiring the parking is located.

B. Except for single-family and duplex dwellings, groups of more than two parking spaces shall be so located and served by an access that their use will require no backing movements or other maneuvering within a street or right-of-way other than an alley.

Response: All parking spaces are located so that no required backing movements or maneuvering occurs within a street or right-of-way.

11. Reduction and Exceptions.

D. The Director may, upon request, allow a reduction in the number of required off-street vehicle and bicycle parking spaces in housing developments for elderly or handicapped persons if such reduction is deemed appropriate after analysis.
of the size and location of the development, resident auto ownership, number of employees, possible future conversion to other residential uses and other similar relevant factors.

**Response:** Major adjustment applications to reduce the required vehicular parking stalls and bicycle parking quantity has been submitted concurrently with the type 3 and conditional use applications.

### 12. Compact Cars.

B. For uses other than residential uses, twenty percent (20%) of the required vehicle parking spaces for long term or designated employee parking lots may be compact spaces. The Facilities Review Committee may recommend allowing more than twenty percent (20%) of the required parking spaces to be used for compact car parking when the applicant shows that more compact car spaces are appropriate.

**Response:** This project proposes that 11 of the parking stalls be compact and are located on the east parking aisle of the site. Due to the tight sight constraints imposed by the wetland buffer, arterial road dedication, and fire access requirements of growing the access aisle from 24' to 26' around portions of the building we have converted the parking on the east drive aisle to compact. Of the 146 stalls provided, 11 of the stalls will be compact resulting in 20% of the stall being defined as compact.

- Standard stalls will be 9'-0" wide by 18'-6" deep.
- Compact stalls will be 8'-6" wide by 15'-0" deep.

D. Compact car parking spaces shall be generally grouped together and designated as such.

**Response:** All compact stalls are grouped together and located adjacent to the east drive aisle and will be designed onsite with visual markings.

### 60.30.15 Off-Street Parking Lot Design.

All off-street parking lots shall be designed in accordance with City Standards for stalls and aisles as set forth in the following drawings and tables.

- **A = Required:** 90 degrees and 90 degrees*
  
  *“Compact” Car

  **Response:** Provided angle is 90 degrees.

- **B = Required:** Stall width 8.5’ standard and 7.5 compact.

  **Response:** Provided width is 9’ standard and 8'-6” compact.

- **C = Required:** Stall Depth 18.5’ standard and 15’ compact.
Response: Provided depth is 18’-6” standard and 15’ compact

D = Required: Aisle Width 24’
Response: Provided width is 26’ drive lanes for 2-way traffic on the north and west drive aisles. South and East drive aisles will be designed ‘one way’ and will have a 22’-0” drive aisle.

E = Required: Stall width 8.5’ standard and 7.5 compact.
Response: Provided width is 9’ standard and 8’-6” compact.

F = Required: Module Width (no bumper overhang) 61’ standard 58’ compact.
Response: Provided module at double loaded parking is 63’

G = Required: Bumper Overhang 3’ standard and 2’ compact.
Response: Provided bumper overhang is at least 3’ @ standard stalls and 2’ @ compact stalls.

H = Required: Backing Area 5’.
Response: Provided backing area is 22’ - 26’.

I = Required: Module Intermesh 61’ standard and 58’ compact.
Response: Provided module intermesh is at double loaded parking is 63’

60.30.20 Off-Street Parking Lot Construction.

Every parcel of land hereafter developed for use as a parking area shall conform to the requirements of the Engineering Design Manual and Standard Drawings.

Response: All new parking stalls will adhere to the engineering design manual where required, unless noted previously.

60.50 Special Use Regulations.

60.50.10 Height Regulations.

The height limitations contained in this Code do not apply to normal appurtenances placed on or extending above the roof level, such as spires, belfries, cupolas, chimneys, antennas, ventilators, elevator housing, or other structures; provided, however, that no structure shall be erected which fails to comply with any applicable state or federal law or regulation. Antennas for wireless communication facilities are not exempted by this section from the applicable height regulations as specified in this Code.

Response: A major modification application for the height is being submitted concurrently with the type 3 and conditional use applications. Elevator and stair over runs will exceed this limit and will be recessed away from the outer most elevations of the building to maintain the residential scale. The roof top will house a roof deck amenity for residence of the facility, parapet walls and railings
will be added to safeguard against falling hazards. The roof deck will be inset from the exterior façade of the building for additional protection.

60.50.20 Fences.

Fences in any district may be constructed at the lot line; provided, however, that fences shall comply with all applicable vision clearance standards established in the Engineering Design Manual. for setback and height limits.

Response: A fence may be added between the sidewalk and adjacent Wetland along NW Walker Road, to separate the wetlands from pedestrian access. An existing fence located on the south property line will be maintained and improved where necessary. The fence will meet the standards established in the engineering design manual.

60.55 Transportation Facilities.

60.55.10 General Provisions.

1. All transportation facilities shall be designed and improved in accordance with the standards of this code and the Engineering Design Manual and Standard Drawings. In addition, when development abuts or impacts a transportation facility under the jurisdiction of one or more other governmental agencies, the City shall condition the development to obtain permits required by the other agencies.

Response: We understand that Washington County and the City of Beaverton are planning for future lane expansions of both NW 185th Avenue and NW Walker Road. We also understand that an imminent road project on NW Walker Road starting near the midpoint of the property is planned (Project #02-927); the designed improvements have been shown on the civil plans and the project has dovetailed to those planned improvements. Beaverton Senior Living Community project has been working with both Washington County and the City of Beaverton, along with a traffic engineer (Kittelson & Associates Inc) to comply with the Engineering Design Manual and Standard Drawings.

2. In order to protect the public from potentially adverse impacts of the proposal, to fulfill an identified need for public services related to the development, or both, development shall provide traffic capacity, traffic safety, and transportation improvements in rough proportion to the identified impacts of the development.

Response: Kittelson & Associates, Inc. has reviewed the site use, access, and parking design for compliance with traffic capacity and safety.

3. For applications that meet the threshold criteria of section 60.55.15. (Traffic Management Plan) or of section 60.55.20. (Traffic Impact Analysis), these analyses or limited elements thereof may be required.


4. The decision-making authority may impose development conditions of approval per Section 10.65.1. of this code. Conditions of approval may be based
on the Traffic Management Plan and Traffic Impact Analysis. Additional street, bicycle, and pedestrian connections may also be required per 60.55.25.

Response: Noted.

5. Dedication of right-of-way shall be determined by the decision-making authority.

Response: Beaverton Senior Living Community has been working directly with Washington County and the City of Beaverton to establish the right-of-way dedication requirements off of NW 185\textsuperscript{th} Avenue and NW Walker Road. The civil plans depict 67 feet of right-of-way for NW 185th Avenue (17 feet of dedication) and 51.5 feet of right-of-way for NW Walker Road (6.5 feet of dedication). The right-of-way dedications for each street are consistent with the Washington County A-1 Arterial Standard for pavement widths and the City of Beaverton Arterial Standard Detail 200-1 for planter strip and sidewalk (see attached). The applicant has no control over the Washington County design for their proposed improvements to NW Walker Road.

6. Traffic calming may be approved or required by the decision-making authority in a design of the proposed and/or existing streets within the Area of Influence or any additional locations identified by the City Engineer. Traffic calming measures shall be designed to City standards.

Response: Noted.

7. Intersection performance shall be determined using the Highway Capacity Manual 2000 published by the Transportation Research Board. The City Engineer may approve a different intersection analysis method prior to use when the different method can be justified. Terms used in this subsection are defined in the Highway Capacity Manual 2000. At a minimum, the impacts of development on a signalized intersection shall be mitigated to peak hour average control delay no greater than 65 seconds per vehicle using a signal cycle length not to exceed 120 seconds. The volume-to-capacity ratio for each lane group for each movement shall be identified and considered in the determination of intersection performance. The peak hour volume-to-capacity (V/C) ratio for each lane group shall be no greater than 0.98. Signal progression shall also be considered. If the intersection is under County or ODOT jurisdiction, the V/C ratio for each land group shall not exceed the V/C ratio imposed by that jurisdiction. [ORD 4706; May 2017] At a minimum, the impacts of development on a two-way or an all-way stop-controlled intersection shall be mitigated to a peak hour average control delay of no greater than 45 seconds per vehicle. If the existing control delay or volume-to-capacity ratio of an intersection is greater than the standards of this subsection, the impacts of development shall be mitigated to maintain or reduce the respective control delay or volume-to-capacity ratio.

Response: Noted.

60.55.15 Traffic Management Plan.
Where development will add 20 or more trips in any hour on a residential street, a Traffic Management Plan acceptable to the City Engineer shall be submitted in order to complete the application. A residential street is any portion of a street classified as a Local Street or Neighborhood Route and having abutting property zoned R2, R4, R5, R7, or R10.

**Response:** Existing site does not abut a “local street or neighborhood route”. The site Abuts NW 185th Avenue and NW Walker Road, which are both arterial streets, a traffic management plan is not applicable to this project.

### 60.55.20 Traffic Impact Analysis

For each development proposal that exceeds the Analysis Threshold of 60.55.20.2, the application for land use or design review approval shall include a Traffic Impact Analysis as required by this code. The Traffic Impact Analysis shall be based on the type and intensity of the proposed land use change or development and its estimated level of impact to the existing and future local and regional transportation systems.

**Response:** Kittelson & Associates, Inc. has prepared a Traffic Impact Analysis.

### 60.55.25 Street and Bicycle and Pedestrian Connection Requirements

1. All streets shall provide for safe and efficient circulation and access for motor vehicles, bicycles, pedestrians, and transit. Bicycle and pedestrian connections shall provide for safe and efficient circulation and access for bicycles and pedestrians.

   **Response:** Beaverton Senior Living Community has been working directly with Washington County and the City of Beaverton to establish the right-of-way requirements off of NW 185th Avenue and NW Walker Road. This includes a bike lane, defined by Washington County, which allows for safe and efficient circulation. Complies with requirement.

2. The Comprehensive Plan Transportation Element Figures 6.1 through 6.23 and Tables 6.1 through 6.6 shall be used to identify ultimate right-of-way width and future potential street, bicycle, and pedestrian connections in order to provide adequate multi-modal access to land uses, improve area circulation, and reduce out-of-direction travel.

   **Response:** Beaverton Senior Living Community has been working directly with Washington County and the City of Beaverton to establish the right-of-way requirements off of NW 185th and NW Walker Road. This includes a bike lane, defined by Washington County, which allows for safe and efficient circulation. Complies with requirement.

3. Where a future street or bicycle and pedestrian connection location is not identified in the Comprehensive Plan Transportation Element, where abutting properties are undeveloped or can be expected to be redeveloped in the near term, and where a street or bicycle and pedestrian connection is necessary to enable reasonably direct access between and among neighboring properties, the
applicant shall submit as part of a complete application, a future connections plan showing the potential arrangement of streets and bicycle and pedestrian connections that shall provide for the continuation or appropriate projection of these connections into surrounding areas.

Response: Not applicable for this project.

4. Streets and bicycle and pedestrian connections shall extend to the boundary of the parcel under development and shall be designed to connect the proposed development's streets, bicycle connections, and pedestrian connections to existing and future streets, bicycle connections, and pedestrian connections. A closed-end street, bicycle connection, or pedestrian connection may be approved with a temporary design

Response: A drive lane is located around the perimeter of the building providing bicycle access around the site. Sidewalks connect the site to the surrounding neighborhood and internally to areas of pedestrian traffic. This project complies with standard.

7. Bicycle and pedestrian connections shall connect the on-site circulation system to existing or proposed streets, to adjacent bicycle and pedestrian connections, and to driveways open to the public that abut the property. Connections may approach parking lots on adjoining properties if the adjoining property used for such connection is open to public pedestrian and bicycle use, is paved, and is unobstructed.

Response: A drive lane is located around the perimeter of the building providing bicycle access around the site. Sidewalks connect the site to the surrounding neighborhood and internally to areas of pedestrian traffic. This project complies with standard.

8. To preserve the ability to provide transportation capacity, safety, and improvements, a special setback line may be established by the City for existing and future streets, street widths, and bicycle and pedestrian connections for which an alignment, improvement, or standard has been defined by the City. The special setback area shall be recorded on the plat.

Response: Beaverton Senior Living Community has been working directly with Washington County and the City of Beaverton to establish the right-of-way requirements off of NW 185th and NW Walker Road.


Response: Beaverton Senior Living Community will provide walkways that connect the site to the surrounding neighborhood. Walkways on the development will provide access to much of the building and provide safe access to the building entrance. Crossings at drive aisles will be minimized to reduce the potential for parking hazard.
11. Pedestrian Connections at Major Transit Stops. Commercial and institution buildings at or near major transit stops shall provide for pedestrian access to transit through the following measures

A. For development within 200 feet of a Major Transit Stop:

1. Either locate buildings within 20 feet of the property line closest to the transit stop, a transit route or an intersecting street, or provide a pedestrian plaza at the transit stop or a street intersection;

2. Provide a transit passenger landing pad accessible to persons with disabilities if required by TriMet and the City;

3. Provide a reasonably direct pedestrian connection between the transit stop and building entrances on the site;

4. Where substantial evidence of projected transit ridership or other transit impacts is presented to conclude both that a nexus exists between the proposed development and public transit and that the degree of impact provides reasonable justification, the City may require the developer to grant a public easement or dedicate a portion of the parcel for transit passenger bench(es), shelter, or both, and, if appropriate, the construction of a transit passenger bench, shelter, or both; and,

5. Provide lighting at the transit stop to City standards.

Response: Site lighting will be provided along the street and on site that will aid in the security and safety of the transit stop adjacent to the site. The transit stop will be positioned adjacent to the new sidewalks being proposed by Washington county’s expansion of NW 185th Avenue and NW Walker Road. The site will connect onto this sidewalk in numerous points to allow for pedestrian traffic to access the surrounding area and the traffic stop. New Washington County-approved streetlights will be installed with frontage improvements on both NW 185th Avenue and NW Walker Road.

12. Assessment, review, and mitigation measures (including best management practices adopted by local agencies) shall be completed for bicycle and pedestrian connections located within the following areas: wetlands, streams, areas noted as Significant Natural Resources Overlay Zones, Significant Wetlands and Wetlands of Special Protection, and Significant Riparian Corridors within Volume III of the Comprehensive Plan Statewide Planning Goal 5 Resource Inventory Documents and Significant Natural Resources Map, and areas identified in regional and/or intergovernmental resource protection programs.

Response: The project does not propose bicycle or pedestrian connections in the wetland or vegetated corridor that exist on the site.

13. New construction of bicycle and pedestrian connections along residential rear lot lines is discouraged unless no comparable substitute alignment is
possible in the effort to connect common trip origins and destinations or existing segment links

Response: Not applicable for this project, due to the wetland there are no pedestrian connections along the residential rear lot lines.

14. Street and Bicycle and Pedestrian Connection Hindrances. Street, bicycle, and/or pedestrian connections are not required where one or more of the following conditions exist

Response: Not applicable for this project.

60.55.30 Minimum Street Widths


Response: Frontage improvements will comply with the standards of Beaverton and/or Washington County as applicable. There are no on-site streets proposed.

60.55.35 Access Standards

1. The development plan shall include street plans that demonstrate how safe access to and from the proposed development and the street system will be provided. The applicant shall also show how public and private access to, from, and within the proposed development will be preserved

Response: This project has been working with the City of Beaverton and Washington County on the right in/right out access locations to the two adjacent arterial streets NW 185th Avenue and NW Walker road. Please see submitted site plans for access points and onsite street and parking layout.

2. No more than 25 dwelling units may have access onto a closed-end street system unless the decision-making authority finds that identified physical constraints preclude compliance with the standard and the proposed development is still found to be in compliance with the Facilities Review criteria of Section 40.03.

Response: No closed-end street system exists within the scope of this project; standard is not applicable.

3. Visibility at Intersections. All work adjacent to public streets and access ways shall comply with the standards of the Engineering Design Manual except in Regional and Town Centers

Response: The Landscape Plan does not propose any obstructions to sight lines at the two site entrances.

3.C Driveways. 2. Shared Driveway Access. Whenever practical, access to Arterials and Collectors shall serve more than one site through the use of driveways common to more than one development or to an on-site private circulation design that furthers this requirement. Consideration of shared access shall take into account at a minimum property ownership, surrounding land uses, and physical characteristics of the area. Where two or more lots share a
common driveway, reciprocal access easements between adjacent lots may be required.

**Response:** No shared drive access is proposed, standard is not applicable.

3.C Driveways. 3. No new driveways for detached dwellings shall be permitted to have direct access onto an Arterial or Collector street except in unusual circumstances where emergency access or an alternative access does not exist. Where detached dwelling access to a local residential street or Neighborhood Route is not practicable, the decision-making authority may approve access from a detached dwelling to an Arterial or Collector.

**Response:** Beaverton Senior Living Community has been working with the City of Beaverton and Washington County to provide access off of NW 185th Avenue and NW Walker Road. Through early planning and discussions, it was ascertained that no viable access could be granted from an adjacent site to the south, access would have to be granted from these two arterial streets.

### 60.60 Trees and Vegetation.

#### 60.60.15 Pruning, Removal, and Preservation Standards

1. **Pruning Standards**

   **Response:** The development area of the site contains Community Trees as defined by BDC Chapter 90. The project is subject to Tree Plan Two requirements for removal of more than five (5) Community Trees in the project area as necessary to accommodate development of the site with required access, parking, and utilities to serve the proposed senior housing community. There is no alternative to removal of the trees as shown. All existing trees in the wetland and vegetated corridor will be retained.

2. **Removal and Preservation Standards.**

   **Response:** During construction, the trees around the existing home will be removed. As shown on the Temporary Erosion and Sediment Control (TESC) Plan, a silt fence/orange construction fence will be installed at the limits of disturbance, which is outside of the protected drip line of the retained trees along the eastern property line. The existing trees in the wetland and vegetated corridor will be separated from the development area by the protective fence.

#### 60.60.20 Tree Protection Standards during Development

1. Trees classified as Protected Trees under this Code shall be protected during development in compliance with the following

   **Response:** The site does not contain any Protected Trees as defined by BDC Chapter 90. As shown on the Temporary Erosion and Sediment Control (TESC) Plan, a silt fence/orange construction fence will be installed at the limits of disturbance. The existing trees in the wetland and vegetated corridor will be separated from the development area by the fence.

#### 60.60.25 Mitigation Requirements
1. The following standards shall apply to mitigation for the removal of Significant Individual Trees or trees within Significant Groves or SNRAs

Response: The site contains only Community Trees as defined by BDC Chapter 90. The site does not contain any Significant Trees, Significant Groves, or SNRAs based on our review of the Beaverton Tree Inventory Map and the Habitat Benefit Areas Map. No specific code-based tree removal mitigation requirement applies; however, the project's landscaping will include ornamental trees in the parking areas and around the building where possible.

60.65 Utility Undergrounding.

60.65.15 Regulation

All existing and proposed utility lines within and contiguous to the subject property, including, but not limited to, those required for electric, communication, and cable television services and related facilities shall be placed underground as specified herein. The utilities required to be placed underground shall be those existing overhead utilities which are impacted by the proposed development and those utilities that are required to be installed as a result of the proposed development.

Response: There are no overhead lines along the project's frontage. The on-site overhead utilities will be removed. All new utilities will be placed underground.

1. At the option of the applicant and subject to rules promulgated by the Oregon Public Utility Commission (PUC), this requirement does not apply to surface mounted transformers, surface mounted connection boxes and meter cabinets, which may be placed above ground, temporary utility service facilities during construction, high capacity electric lines operating at 50,000 volts or above, and that portion of a project where undergrounding will require boring under a Collector or Arterial roadway, and City funded roadway projects which the City Council has specifically considered and declined to fund utility undergrounding as a component of the roadway project, Washington County funded roadway projects, such as MSTIP projects, and Oregon Department of Transportation funded roadway projects.

Response: This is not expected to impact the project.

2. The developer shall make all necessary arrangements with the serving private utility to cause the utility service(s) to be placed underground.

Response: All new utilities will be placed underground.

3. The City reserves the right to approve surface mounted facilities.

Response: All new utilities will be placed underground.

4. All underground public and private utilities shall be constructed or installed prior to the final surfacing of the streets; and
Response: The construction sequence will be described on construction level civil plans.

5. Stubs for service connections and other anticipated private extensions at street intersections shall be long enough to avoid disturbing street surfaces and right-of-way improvements such as sidewalks and landscaping areas when service connections are made.

Response: No utility stubs will be needed at public streets. All utilities will be internal to the site.

6. Unless otherwise specifically required in an existing franchise between the City and the particular private utility, or PUC rule, the applicant or developer responsible for initiating the requirement for placing overhead utilities underground is responsible for the cost of converting all existing customer equipment and private utilities on private or public property, or both to meet utility undergrounding requirements.

Response: This does not apply as all existing single-family services will be removed and reinstalled for the proposed senior living facility.

7. If the private utility service provider requires an applicant, as a component of the applicant's placing private utilities underground, to install facilities to accommodate extra capacity beyond those necessitated by the proposed development, the private utility service provider shall be financially responsible for providing the means to provide such extra capacity.

Response: This note will be added to the construction level civil plans, if applicable.

60.65.20 Information on Plans

The applicant for a development subject to design review, subdivision, partition, or site development permit approval shall show, on the proposed plan or in the explanatory information, the following:

1. Easements for all public and private utility facilities;

2. The location of all existing above ground and underground public and private utilities within 100 feet of the site;

3. The proposed relocation of existing above ground utilities to underground; and

4. That above ground public or private utility facilities do not obstruct vision clearance areas pursuant to Section 60.55.35.3 of this Code.

Response: This information is provided on the civil plans.

60.67.05 Local Wetland Inventory

Prior to issuing a development permit, the Local Wetland Inventory map shall be reviewed to determine if the site proposed for development is identified as the location of a significant wetland.

1. Development activities and uses permitted on a proposed development site identified as the possible location of a significant natural resource, including
significant wetlands shall be subject to relevant procedures and requirements specified in Chapter 50, of this ordinance.

2. Upon City's determination that a site contains wetland as identified on the Local Wetland Inventory map, notice of the proposed development shall be provided to the Division of State Lands (DSL) in a manner and form prescribed by DSL pursuant to ORS requirements.

Response: Wetland mitigation measures have been taken for ½ acre of wetland on site. Mitigation is currently being reviewed by DSL and army corps of engineers.

Sincerely,
Ankrom Moisan Architects, Inc.

Gunnar Langhus
Senior Project Manager
COMPREHENSIVE PLAN NARRATIVE

Goal 3.1.1 Encourage development and land use patterns that support a variety of transportation options

Chapter 3 Policies:

a) Emphasize pedestrian convenience and safety in all developments and transportation facilities.

Response: Project is providing cross walks that connect on site pedestrian traffic to new sidewalks on NW 185th ave. and NW Walker rd. The new sidewalks connect to updated bus stop lines, provided by the city and WA county. Internal pedestrian circulation to be indicated by cross walks that utilize a different pattern to alert vehicular traffic of potential pedestrian traffic.

b) Encourage development and programs that reduce the need for vehicle use and ownership.

Response: The Beaverton Senior Living Facility is designed towards senior use. The senior use results in low traffic volumes in comparison to typical residential apartments. A large percentage of the residents will be of retired age, resulting in lower traffic being generated on site at city's peak commuting time frames.

c) Ensure that new development is designed to provide safe, comfortable and direct pedestrian and bicycle connections to and through the development, including to reach nearby points of interest.

Response: Project is providing cross walks that connect on site pedestrian traffic to new sidewalks on NW 185th avenue and NW Walker rd. Internal pedestrian circulation to be indicated by cross walks that utilize a different pattern to alert vehicular traffic of potential pedestrian traffic. The City of Beaverton and Washington County are dedicating land off of NW 185th avenue and NW Walker rd., to upgrade these two arterial streets. The new streets will meet current Washington County Arterial street design standards, which account for a dedicated bicycle lane and safer wider sidewalks pulled away from the right of way curb.

d) Apply land use designations and development regulations that support high-density development near transit and services, in order to provide greater opportunities to live, work, and meet daily needs near transit.

Response: Site is zoned as an R2 Residential Urban Medium Density District. Beaverton Senior Living Facility will meet the Min/Max residential density required for a site this size. The project program consists of 100 independent living units (age restricted residential apartments), 72 assisted living units, and 34 state licensed memory care units. In addition to the residents, the facility will employ between 100 – 120 staff members. Transit bus stops are located adjacent to the property on both NW 185th ave and NW Walker rd, which can be utilized by residents and staff.

e) Encourage increased intensity of development within Mixed Use, Commercial, and Employment areas that are located within a half-mile of high capacity transit stops or stations, such as MAX and WES.
Response: This policy is not applicable as building site is located in a residential zone and not in a Mixed Use, Commercial, and Employment areas.

f) Ensure that development adjacent to transit stops and stations is designed to provide direct, convenient and comfortable connection

Response: Direct connections through the site and to adjacent street sidewalks are provided. Transit stops are located within walking distance of the facility entrances.

g) Encourage providing amenities for transit users at transit stops or stations, such as food carts and coffee stands, covered benches, trash/recycling receptacles, and lighting.

Response: Site lighting near the NW Walker rd transit stop will be provided, to aid in the safety and security of residents and transit users.

h) Allow use of private parking lots near transit stops and stations for park-and-ride facilities during hours when the parking spaces are not needed for on-site uses.

Response: Policy is not applicable to this project as residents will be utilizing the facility and parking lot on a 24-hour basis.

i) Encourage the use of innovative technologies that improve parking and transportation efficiency.

Response: The use of nearby transit bus stops and mix of bicycle and vehicular on-site parking allow for improved parking and transportation efficiencies.

j) Encourage use of structured, underground, and/or tuck-under parking for commercial, office, and multifamily development.

Response: Not applicable to this project; a separate traffic analysis and parking and parking memo have been provided to the city as a parking adjustment for the site. Parking adjustment is being reviewed concurrently with the Design Review III and Conditional Use reviews.

k) Encourage shared parking agreements in all areas with significant volumes of surface parking lots.

Response: The neighboring residential Condominiums to the south and the residential single-family homes to the west all have their own designated parking areas that meet their needs. No share parking is required.

l) Accommodate automobile access and parking in an efficient manner that does not detract from the desirability of other modes

Response: Site provides various onsite parking options for residents and staff. Pedestrian connections through the parking areas allow for access to nearby city transit bus stops.

3.2 Infill and Redevelopment

The city’s buildable lands inventory shows that there is not much vacant land left in any comprehensive plan designation, except for land added to the city through expansion of the urban growth boundary. This means that a significant share of future growth in the city will occur through infill and redevelopment.
Response: Site is zoned as an R2 Residential Urban Medium Density District. Beaverton Senior Living Facility will meet the Min/Max residential density required for a site this size. Beaverton Senior Living facility is located on a site where 1 single family house will be replaced with a facility that houses 100 independent living units (age restricted residential apartments), 72 assisted living units, and 34 state licensed memory care units.

Goal 3.3.1 Promote sustainable development, resilience, and resource protection Policies:

a) Use land effectively in urban areas to relieve development pressure in rural areas and help protect farms, forests and natural resources.

Response: Site is located within the urban context of the Beaverton community. Zoning required min/max densities will be adhered to, which will relieve development pressure of rural areas. A portion of the on-site wetland will be mitigated through a mitigation bank, the remaining wetland will be improved by clean water services.

b) Conserve, protect and enhance natural resources identified in the city’s adopted Significant Natural Resources inventories, consistent with policies in the Natural Resources Element.

Response: A portion of the on-site wetland will be mitigated through a mitigation bank, the remaining wetland will be improved and maintained by clean water services.

c) Encourage and incentivize sustainable building and site design approaches that minimize environmental impacts of the built environment while creating healthy, safe places for people to live, work and play, through:

i. Energy conservation and renewable energy

ii. Reducing resource consumption and waste

iii. Reducing water consumption and wastewater generation, including use of non-potable water systems where appropriate

iv. Integration of storm water and natural systems

v. Protecting and supporting human health

vi. Designing for adaptability over time

Response: (i) The facility will meet/exceed the Oregon Energy Code. (ii) The senior use typically creates less waste and resources per resident than typical residential apartments. (iii) The senior use typically utilizes less water than typical residential apartments, in addition low flow fixtures will be utilized within the building. (iv) Storm water will be collected on site and used to in the enhancement of the adjacent wetlands. (v) The building will utilize Low VOC and natural materials throughout the building. (vi) The facility is designed to allow flexibility in long term operations and services.

d) Wherever possible, allow resource areas to serve multiple purposes and acknowledge their multiple benefits.
Response: The onsite wetlands provide natural habitat and site enhancement for residents and staff.

e) Increase the resiliency of the built environment by:

i. Promoting retrofits to existing buildings and public facilities to increase the likelihood that buildings will stand, and people can remain in place.

ii. Increasing awareness of natural hazard risks and the value of mitigation and preparedness measures

iii. Encouraging the design of new public buildings to provide safe gathering spaces in the event of a natural disaster or other major emergency event

iv. Promoting the design of new buildings and infrastructure to withstand a natural disaster with minimal or no repair

Response: Facility will be designed to meet and exceed local structural and seismic loads for longevity in a natural disaster. The facility will be protected throughout with a fire sprinkler and alarm systems, allowing for increased protection in the case of an emergency. With the memory care and assisted living units, the emergency systems and building will support a ‘save in place’ strategy for residents.

Goal 3.6.1 Support pedestrian-oriented mixed-use areas

The following policies apply to all Mixed-Use areas.

Policies:

a) Provide for a mix of commercial, residential, employment, and civic uses at relatively high densities to create vibrant, walkable areas where many activities can be accomplished on foot or by bike or transit.

Response: Facility is located in a medium density neighborhood area. The facility will provide a variety of services including a commercial kitchen, various dining venues, an indoor swimming pool, and a multipurpose community room.

b) Uses may be mixed vertically (i.e. within a single building on different floors) or horizontally (i.e. within different buildings) but should be mixed so that different uses are within easy walking distance of one another.

Response: The various uses are mixed horizontally and located on the ground floor of the building and are within walking distance for residents and staff.

c) Limit or prohibit auto-oriented commercial uses, including vehicle sales and services, drive-through uses, and uses requiring extensive outdoor storage, to enhance the pedestrian environment.

Response: No auto-oriented commercial uses are included within the scope of the project; policy is not applicable to the Beaverton Senior Living Facility.

d) Pedestrian-oriented design is a priority within mixed use areas. Pedestrian oriented design generally includes:
i. Commercial and mixed-use buildings located next to the sidewalk with windows, interesting facades, pedestrian-scale design features (e.g. lighting, awnings and signage), and majority of parking located behind, above, or beneath development

ii. Residential buildings with windows and doors facing the street, and privacy provided through landscaping, grade changes, and modest setbacks

iii. Complete streets and sidewalks that provide high-quality space for pedestrians and protect pedestrians from fast-moving traffic (by using buffers such as curbside parking, landscaping, trees and street furniture)

**Response:** Sidewalks along NW 185th avenue and NW Walker rd. will be upgraded to meet current city standards, which include a landscape buffer for pedestrian separation from traffic. The building façade for residents will include large scale building articulation through large building shifts to create visual interest along the façade. Resident units on the ground floor, facing the arterial streets, will have an additional landscape buffer from the internal pedestrian sidewalk to create additional privacy. Patio's with landscaping are provided at ground floor.

**Goal 3.7.4 Neighborhood Center: Provide opportunities for small-scale commercial development that serves adjacent neighborhoods**

The following policies apply to Neighborhood Centers, in addition to policies under Goal 3.7.1.

**Policies:**

a) Limit the scale and type of non-residential uses to ensure compatibility with surrounding neighborhoods.

**Response:** The assisted living and memory care units in conjunction with the first-floor common areas have been designed to create a residential feel to the facility; complimenting the independent living unit functions. Building height is limited to 3 stories at the southern building mass to respond to the residential scale created by the adjacent Crossings Condominiums. The independent wing to the north of the property will be 4 stories, as the properties the North and West are a commercial in use.

b) Limit or prohibit auto-oriented commercial uses:

   i. Allow limited new automotive services (e.g. gas stations, car wash, and car repair) at a small scale where compatible with adjacent uses and where the design of the site and building or structure promote a quality pedestrian environment along the street

   ii. Prohibit land-intensive vehicle sales and service uses, uses requiring extensive outdoor storage, and largescale automotive services.

   **Response:** No new automotive services are provided on site; policy is not applicable to scope of the facility.

c) Use development standards and/or conditional use review to address potential issues related to compatibility of neighborhood commercial uses with adjacent housing, including noise, access and parking.
Response: Onsite commercial uses will be located on the first floor, levels 2 through 4 will primarily consist of resident units (either assisted living or independent living). Project is applying for a conditional use review concurrently with the design review III review. A parking reduction is being requested, through a parking major modification, as the senior use has a lower parking demand in comparison to typical residential apartments. On the North and West property lines, the site is buffered from adjacent properties by the two primary arterial streets. A wetland with a 50’ code defined buffer screens the site from the neighbors to the East. The drive aisle has been pulled off of the south property line +/- 15’ and landscaping provided to create a buffer from the residential condominiums to the south.

d) Allow the continuation of existing residential uses and new residential uses that are part of a mixed use development or support and provide opportunities for future neighborhood commercial uses within the Neighborhood Center.

Response: Facility is not defined as a neighborhood center; policy is not applicable to scope of project.

e) Improve and enhance connections to adjacent neighborhoods to make it easier and more enjoyable for neighbors to walk or bike to the Neighborhood Center.

Response: Facility is not defined as a neighborhood center; policy is not applicable to scope of project.

f) The Neighborhood Center designation may be applied in areas that:
   i. includes existing small-scale commercial and neighborhood-serving uses;
   ii. provide a transition between more intensive commercial or mixed-use designations and Neighborhood Residential designations; or
   iii. are along collector or arterial roads adjacent to Medium and/or High-Density Neighborhoods that lack commercial services.

Response: The site is zoned R2 High density residential, with residential zones to the south and East of the property. The site is a corner lot at an intersection of 2 arterial streets (NW 185th avenue and NW Walker rd.), with all other properties adjacent to the intersection being or commercial use. This facility with its residential and commercial use functions well as buffer between commercial and residential zones.

Goal 3.8.1 Complete and livable Neighborhoods The following policies apply to all Neighborhoods.

Policies:

a) Regulate maximum residential density by zone to maintain a balance between planned land uses and infrastructure capacity.

Response: Site is zoned as an R2 Residential Urban Medium Density District. Beaverton Senior Living Facility will meet the Min/Max residential density required for a site this size. Maximum density allowed is 120 units, facility will provide 100 independent living units meeting the residential density.
requirements. The assisted living and memory care units are being reviewed as a conditional use and are not included in the residential density calculations. Existing infrastructure has capacity to accommodate the proposed uses.

b) Regulate minimum residential density to ensure efficient use of residential land and meet regional housing needs.
   i. Generally, the zoning code should require that residential development achieve at least 80% of the maximum density allowed in the applicable zoning district.
   ii. Minimum densities should be calculated excluding significant natural resource areas and other constrained lands.

   **Response:** Site is zoned as an R2 Residential Urban Medium Density District. Beaverton Senior Living Facility will meet the Min/Max residential density required for a site this size. Minimum density allowed is 96 units, facility will provide 100 independent living units meeting the residential density requirements. The assisted living and memory care units are being reviewed as a conditional use and are not included in the residential density calculations.

c) Allow flexibility through lot size averaging and other tools to provide flexibility and housing variety while maintaining an overall density consistent with the Comprehensive Plan designation and zoning.

   **Response:** R2 zone is not eligible for lot size averaging per 20.05.15 site development standards, policy is not applicable.

d) For development that achieves a public benefit or goal (i.e. increased housing options, public space or affordable housing) the city may provide opportunities in the Development Code to allow additional housing units that exceed the ranges listed for each Comprehensive Plan designation.

   **Response:** Facility is not going for an allowance to exceed housing density through a public benefit or goal. Not applicable to this facility.

e) Provide opportunities for a variety of housing types in all residential plan designations while maintaining a scale and character consistent with the intent of each plan designation.

   **Response:** Facility will house 3 different resident classifications; independent living, state licensed assisted living, and a state licensed memory care wing. Within the assisted living and independent living units, residents will have an option of renting either studio's, one bed's, or two bed units that are sized to meet market demands.

f) Facilitate development of housing that is affordable to a range of incomes, including low-income households.

   **Response:** While low income housing in not part of the scope of this project, there is a need for senior housing. We have provided a range of different unit types to all flexibility to residents of different incomes.

g) Ensure integration of parks and schools into neighborhoods in locations where safe, convenient connections from adjacent neighborhoods on foot and by bike are or will be available.

   **Response:** Facility will house senior aged residents, which will have lower impact on neighboring schools and parks. Two internal courtyards will be provided for
residential use, providing residents with a safe environment that is conveniently located for ease of use.

h) Use Crime Prevention through Environmental Design (design that provides opportunities for “eyes on the street” through street-facing windows and doors) to reduce graffiti, vandalism and other property crimes and to promote a feeling of safety for pedestrians.

**Response:** Facility will be staffed 24 hours a day, 7 days a week with surveillance cameras being strategically placed around perimeter of building. Resident units look out in all directions of the building, allowing for additional eyes over the parking, landscaped, and wetland areas.

i) Require subdivisions and development on large sites to create a connected network of pedestrian ways, local streets, and other multimodal connections, including connections to adjacent properties or opportunities to connect in the future.

**Response:** Site is at a scale where one central building will suffice for resident and staff needs, a subdivision of the property is not required. Exterior circulation and parking are provided around the building and interconnect with the street adjacent sidewalks creating interconnected pedestrian ways.

**Goal 3.8.3 Medium and High Density Neighborhoods: Provide for a variety of housing types and higher residential densities in areas with more amenities and transit service**

The following policies apply to Medium and High Density Neighborhoods, in addition to policies under Goal 3.8.1.

Policies:
a) Provide for a variety of housing types, with an emphasis on multifamily and attached single family housing.

**Response:** Facility is a residential/commercial style and scale of building which differs from the residents to the East and South. The residents on the East consist of single-story homes, residents to the south reside in apartment style condominiums. This results in three different housing types and scales in this area, meeting the policy goals of variety. The building itself provides a variety of housing types or services as well; independent living, assisted living, and memory care.

b) Establish zoning regulations that allow housing at generally the following residential densities, while allowing for flexibility as described under Goal 3.8.1:

i. Medium Density Neighborhoods: one unit per 2,000-5,000 square feet of residential land area

ii. High Density Neighborhoods: one unit per 1,000-2,000 square feet of residential land area

**Response:** Site is zoned R2 Residential Urban Medium Density District with a maximum of one unit per 2,000 square feet of residential land. Facility meets the minimum and maximum density requirements for this site.
c) Focus the highest density housing closest to transit, commercial services, parks, and/or other amenities, to provide convenient access to these amenities by as many households as possible.

**Response:** Facility is located adjacent to two transit stops, one on NW Walker rd. and the other on NW 185th avenue. Residents and staff members are anticipated to utilize the adjacent transit stops.

d) Provide direct and efficient pedestrian and bicycle connections to nearby retail and services, transit, parks, and/or schools.

**Response:** The City of Beaverton and Washington County have requested dedicating land off of NW 185th avenue and NW Walker rd., to upgrade these two arterial streets. The new streets will meet current Washington County Arterial street design standards, which account for a dedicated bicycle lane that provide connection to nearby retail. The site is located at the cross section of two arterial streets, with commercial space located directly across. Cross walks will be utilized to provide pedestrian traffic, across the arterial's streets, to these commercial areas.

e) Ensure that the internal circulation system for larger developments creates direct and desirable pedestrian and bicycle routes and connects to adjacent local streets wherever possible.

**Response:** A drive aisle located around the building, with a maintained speed limit, will allow for safe vehicular and bicycle traffic in and around the site.

f) Allow for innovative housing types and designs that are consistent with the other policies for these neighborhoods to accommodate projected growth and meet the diverse housing needs of the community.

**Response:** The independent living units are being provided to meet the local market needs for senior apartments and will meet city defined density requirements. The assisted living and memory care units provide innovative housing types for senior residents, fulfilling a market driven need for this resident type as a response to the growth of the area.

g) Allow limited, small-scale retail and service uses that primarily serve the immediate neighborhood and are compatible with adjacent residential uses in terms of the amount of traffic created, noise, parking needs, and other quality of life issues.

**Response:** Service areas are being provided on the first floor, consisting of a commercial kitchen, various dining venues, game rooms, salon, etc. These areas will serve building residents and typically will not be open to the outside public. No additional traffic demand is anticipated to be created from these service areas, a separate traffic analysis and parking and parking memo have been provided to the city as a parking adjustment for the site, with the intent of reducing the overall parking from minimum zoning requirements. Parking adjustment is being reviewed concurrently with the Design Review III and Conditional Use reviews.

h) The Medium and High-Density Neighborhood designations may be applied in areas that have walkable access to transit, commercial services, parks, and/or other amenities. The Medium Density Neighborhood may serve as a transition between Standard Density or Low-Density Neighborhoods and higher density neighborhoods or commercial or mixed-use designations.
Response: The site is zoned R2 High density residential, with residential zones to the south and East of the property. The site is a corner lot at an intersection of 2 arterial streets (NW 185th avenue and NW Walker rd), with all other properties adjacent to the intersection being or commercial use. This facility with its residential and commercial use functions well as buffer between commercial and residential zones.

Goal 4.1.1 Provide an adequate supply of housing to meet future needs

Policies:

a) Use available land within the city efficiently, encouraging new residential development to take advantage of allowed maximum densities where appropriate

Response: Site is zoned as an R2 Residential Urban Medium Density District. Beaverton Senior Living Facility will meet the Min/Max residential density required for a site this size. The project program consists of 100 independent living units (age restricted residential apartments), 72 assisted living units, and 34 state licensed memory care units. The minimum density for this site is 96 units and the maximum density of 120 units. The 100 independent living units fall within this range and meet the requirements; the assisted living and memory care units are defined as condition use and are not included in residential density calculations.

Response: Site is zoned as an R2 Residential Urban Medium Density District

b) Support higher density infill development that capitalizes on existing infrastructure and where impacts can be mitigated

Response: The site is located within the city of Beaverton and supports the density outlined in the City of Beaverton zoning code. Less than ½ acre of wetland will is to be mitigated, per the Army corps of engineers and Clean water services. The remaining portion of the wetland on site will be maintained and improved upon per clean water services requirements. A 50’ buffer from the wetland will be maintained to further reduce the impact the new facility will have on the wetland.

c) Encourage high density residential development on mixed use and commercially zoned sites with proximity to transit and amenities with the objective of creating 18-hour neighborhoods

Response: Site is zoned as an R2 Residential Urban Medium Density District

d) Develop a Housing Implementation Plan that is updated regularly based on market conditions and trends

Response: Not Applicable.

e) Develop programs or strategies to improve Beaverton's jobs-housing balance, thereby reducing impacts on transportation infrastructure and the environment

Response: Not Applicable.

f) Strive to meet the city's future housing demand within city limits, while coordinating with Washington County and Metro to assess future housing needs at a larger geographic scale, especially for detached single family units

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Response: Beaverton Senior Living facility meets the housing demand as defined in the R2 zoning districts. Complies with city’s housing policy.

g) Support UGB expansions and city boundary changes that consider the city’s unique geopolitical boundaries and the availability of city and other urban services to help meet the city’s identified housing needs

Response: Beaverton Senior Living facility meets the housing demand as defined in the R2 zoning districts. Complies with city’s housing policy.

h) Provide an efficient, consistent, and reliable development review process

Response: Beaverton Senior Living facility complies with city standards for review process. Applications for design review III, conditional use, and applications for major and minor modifications have been submitted to the city for concurrent review.

i) Work with regional partners to develop measures that reduce upfront housing development costs

Response: Not Applicable.

Goal 4.2.1 Provide a variety of housing types that meet the needs and preferences of residents

Policies:

a) Ensure that sufficient land is appropriately zoned to meet a full range of housing needs, including an adequate amount of detached single-family housing to meet projected demand

Response: Site is zoned as an R2 Residential Urban Medium Density District. Beaverton Senior Living Facility will meet the Min/Max residential density required for a site this size. The project program consists of 100 independent living units (age restricted residential apartments), 72 assisted living units, and 34 state licensed memory care units. This facility provides a variety of housing needs based on market demand.

b) Develop partnerships and programs and dedicate funding to expand ownership opportunities across income ranges, including the preservation of the city’s supply of moderately priced single-family homes

Response: Not Applicable.

c) Identify and research emerging housing types and regularly consider appropriate updates to the Development Code to allow for their development

Response: Not Applicable.

d) Incentivize the development of housing types that are needed but not currently being provided in adequate numbers by market forces, such as single level detached homes and larger multifamily rental units

Response: A market study has been reviewed for this area and identified a need for senior apartments (independent living) and senior living (assisted living and memory care) units to meet the needs of the area.
e) Support older residents’ ability to age in place through targeted investments that make existing housing more age-friendly and accessible and contribute to neighborhood stabilization

**Response:** Beaverton Senior Living provides independent living, assisted living, and memory care units all in one building. This affords residents to move into the facility and as their needs increase due to the natural process of aging; additional services are available to allow residents to age in place.

f) Encourage the development of a variety of housing types within planned unit developments and other large projects, which can serve to improve the aesthetic character of the neighborhood and provide housing choices for different income levels

**Response:** Site is zoned as an R2 Residential Urban Medium Density District. Beaverton Senior Living Facility will meet the Min/Max residential density required for a site this size. The project program consists of 100 independent living units (age restricted residential apartments), 72 assisted living units, and 34 state licensed memory care units. This facility provides a variety of housing needs based on market demand.

**Goal 4.5.1: Ensure that Beaverton continues to be one of the most livable communities in the region**

**Policies:**

a) Encourage quality design throughout the city that acknowledges neighborhood character, provides safe and direct connections for pedestrians and bicyclists to a variety of destinations, and integrates open space, natural resources and scenic view corridors

**Response:** The site is a corner lot at an intersection of 2 arterial streets (NW 185th avenue and NW Walker rd.), with all other properties adjacent to the intersection being or commercial use. This facility with its residential and commercial use functions well as buffer between commercial and residential zones. Pedestrian circulation is provided around the exterior of the facility and connects to the primary sidewalks abutting the arterial streets. Washington county is utilizing land dedications to allow for the widening of the NW 185th avenue and NW Walker rd. This increase in size includes bicycle lanes that provide access from too and from the site. A wetland corridor on the east property line of the site will have ½ acre mitigated through clean water services and the army corps of engineers’ mitigation bank. The remaining wetland will be improved per clean water services requirements. Street landscaping will be provided to meet city standards, additional landscaping will be provided around the facility and within two large interior courtyards to integrate open space into the design.

b) Provide support to local neighborhood associations for programs that encourage neighborhood pride such as clean up days, block parties, community gardens, and other special events

**Response:** Not Applicable.

c) Work with neighborhood associations to improve resiliency by preparing residents for potential natural disasters and economic uncertainty
Response: Not applicable to the scope of this project.

d) Engage the community in a continuing dialogue about the city’s anticipated population growth, limited land supply, and current housing trends

Response: Not applicable to the scope of this project.

e) When considering comprehensive plan and zoning map amendments, address the potential impacts of densification, including increased traffic and noise, on established neighborhoods

Response: Due to the senior use of the site, traffic and noise will be reduced in comparison to that of what a typical apartment would have. Meets policy.

f) Provide flexible development standards for projects that exceed the minimum requirements for natural resource protection, open space and public gathering places, and energy efficiency

Response: Beaverton Senior Living facility will meet and/or exceed the Oregon energy code. Remaining wetlands on site will be protected and enhanced per clean water services standards, this includes providing a 50’ buffer from the wetland edge to the site development. Courtyards are provided internal of the building footprint to create open usable exterior space for residents. Additional landscaping around the building and affronting the streets and adjacent properties to create open space exterior of the building.

g) Work with regional partners to improve bicycle and pedestrian access to nearby parks, schools, and neighborhood services and provide increased opportunities for healthy active living

Response: Not applicable to the scope of this project.

h) Encourage a compact mix of uses at the neighborhood level that increase the number of local jobs and services, and reduce impacts to the city’s transportation system

Response: The Beaverton Senior Living facility will host a mix of uses to support the independent living, assisted living, and memory care occupants. It is anticipated that the facility will employ 100-120 staff members, and provide a mix of services including but not limited to dining, salon, fitness, multipurpose gathering areas, etc...

i) Provide adequate opportunities for residents to be involved in decisions affecting their neighborhoods

Response: City provided the opportunity for all residents to participate in the Five Oaks Triple Creek neighborhood association.

j) Review and reconsider minimum parking standards for new multiple family development.

Response: A traffic analysis and parking study has been submitted as a major adjustment to the design review III and conditional use permits for the facility. The intent is to reduce overall parking to meet the actual needs of a senior use facility of this nature.

5.5.1 Goal: The City shall continue to participate in the Joint Water Commission and work with the West Slope, Raleigh and Tualatin Valley Water Districts to ensure the provision of adequate waterservice to present and future customers in Beaverton.
Policies:

a) All new land development (residential subdivisions, multiple family dwelling development, and industrial and commercial developments) shall be connected to a public water system.

   **Response:** Will serve letters have been provided by all utilities, facility will connect into the public water system.

b) All new development served by the Beaverton Water Division shall be reviewed by the City to determine that the pressure of water available to serve the proposed development meets City standards.

   **Response:** Will serve letters have been provided by all utilities, facility will connect into the public water system.

c) The City shall ensure water conservation consistent with current intergovernmental agreements, to prolong existing supplies and to help postpone water system capacity improvements needed to supply expected future demands as a result of projected population increases.

   **Response:** Senior use facilities typically have less water demand; the typical resident will be of retired age and will not add to peak demand periods. Low flow fixtures will be used throughout the facility.

d) The City will comply with State and federal laws and regulations relating to potable water.

   **Response:** Facility will meet or exceed current Oregon state codes, and any applicable federal laws such as the ‘Americans with Disabilities’, etc...

5.6.1. Goal: The City shall continue to cooperate with CWS to ensure long-term provision of an adequate sanitary sewer system within existing City limits and areas to be annexed in the future.

Policies:

a) All new land development (residential subdivisions, and multiple family dwelling, industrial, and commercial developments) shall be connected to the City sewer system.

   **Response:** Will serve letters have been provided by all utilities, facility will connect into the city sewer system.

b) When sewer service is extended into an area that contains existing development, all existing habitable buildings shall be connected to the new sewer if they are within 100 feet of the sewer line and if gravity lateral sewer lines can serve them.

   **Response:** Facility will connect to adjacent sewer system, existing on site sewer connections will be demoed.

5.8.1 Goal: Cooperate with THPRD in implementation of its 20-Year Comprehensive Master Plan and Trails Master Plan in order to ensure adequate parks and recreation facilities and programs for current and future City residents.
POLICIES:

a) The City shall support and encourage THPRD efforts to provide parks and recreation facilities that will accommodate growth while recognizing the limited supply of buildable land in the city for such facilities.

Response: No trails or parks have been identified for this location and are not included in the scope of this project.

b) The City shall encourage THPRD to provide parks and recreation facilities throughout the City in locations that are easily accessible to those they are intended to serve.

Response: No trails or parks have been identified for this location and are not included in the scope of this project.

c) The City shall support and encourage acquisition of park and recreation sites in advance of need so that the most appropriate sites are available for these vital public facilities.

Action 1: The City shall work with THPRD to further explore opportunities for mixing public park and recreation activities with revenue-generating public/private partnerships such as restaurants, recreation and aquatic centers, sports complexes, or other concession activities, in order to help finance recreation programming, park acquisition, and maintenance.

Response: No trails or parks have been identified for this location and are not included in the scope of this project.

d) The City shall notify THPRD of development proposals that may potentially impact a present or future park site to allow the district the opportunity to comment, purchase or request dedications.

Response: No trails or parks have been identified for this location and are not included in the scope of this project.

e) A number of financial incentives exist to encourage private property owners to donate, dedicate, or provide easements for resource preservation, park, trail or open space use. The City shall work cooperatively with property owners and THPRD to maximize the use of these tools for the benefit of the community.

Action 1: The City shall develop a program to encourage preservation and restoration of habitat benefit areas in cooperation with THPRD.

Response: Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee’s to be provided to a mitigation bank.

f) To offset increased densities and to meet the needs of the population, the City and THPRD should work together to provide urban scale public spaces in regional centers, town centers, station communities and main street areas within the city.

Response: No urban scale public spaces have been identified for this location and are not included in the scope of this project.

g) The planning, acquisition and development of multi-use paths should be consistent with this Plan’s Transportation Element and THPRD’s Trail Master Plan.

Response: No multi-use paths have been identified for this location and are not included in the scope of this project.
h) The City shall encourage park acquisition and appropriate development in areas designated as Significant Natural Resources, as defined by Volume III of this Comprehensive Plan.

**Response:** No park spaces have been identified for this location and are not included in the scope of this project.

i) THPRD is the park and recreation provider for the City of Beaverton and the City desires that all property within its boundaries be within THPRD’s boundaries.

**Action 1:** Amend the Development Code to require owners of properties applying for a conditional use, design review or land division to annex to THPRD and to pay THPRD’s System Development Charges.

**Response:** Facility will pay system development charges associated with design review III and conditional use.

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**5.10.1 Goal:** Cooperate with TVF&RD to insure adequate fire and emergency medical services for the current and future residents of the City.

**Policies:**

a) Retain TVF&RD as the provider of fire and emergency medical services for the entire City of Beaverton incorporated area.

**Response:** TBF&RD has reviewed and approved the facility and site for emergency access, see permit number 2019-0013 for approval.

b) The City shall cooperate with TVF&RD in the siting of new facilities.

**Response:** TBF&RD has reviewed and approved the facility and site for emergency access, see permit number 2019-0013 for approval. This approval has been communicated to the city.

c) The TVF&RD shall enforce the Uniform Fire Code for existing buildings and the City shall enforce it for new construction.

**Response:** TBF&RD has reviewed and approved the facility and site for emergency access, see permit number 2019-0013 for approval.

d) The City shall adopt and enforce the State Building Code.

**Action 1:** The City shall adopt and enforce an optional element of the State Building Code that requires automatic fire sprinkler systems for apartments buildings over one story or with more than sixteen (16) units for new construction.

**Response:** Facility will meet or exceed the Oregon state codes, a fire sprinkler system will be provided throughout the facility.

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**6.2.1 Goal:** Transportation designed and constructed in a manner to enhance Beaverton’s livability and meet federal, state, regional, and local requirements.

**Policies:**

a. Maintain the livability of Beaverton through proper location and design of transportation facilities.
Response: Facility will meet the city and county’s requirements for landscaping along the two primary arterial streets NW 185th and NW Walker rd. Additional landscape buffering will be added to these areas to further enhance the green streets aesthetic of the community. The proposed development has made allowances for the new proposed right-of-way design proposed for NW Walker rd and NW 185th as part of the city and Washington county arterial expansion projects. Site access points have been coordinated with Washington county, existing bus stops will be relocated per city engineers requirements.

b. Consider noise attenuation measures in the design and redesign of arterial streets immediately adjacent to residential development.

Response: Landscape buffers with Vegetative screening will be provided along the right-of-way expansions of NW 185th avenue and NW Walker rd. to help reduce noise attenuation.

c. Protect residential neighborhoods from pollutants associated with nearby transportation facilities, industrial uses, and rail activities.

Response: Facility will provide landscaping around in and around the site, which will aid in reducing pollutants. In addition, the senior use of the facility will result in lower trip generation than a standard residential apartment complex, further reducing the pollution generated.

d. Locate and design multi-use paths to balance the needs of human use and enjoyment with resource preservation in areas identified on the Natural Resource Inventory Plan Map for their Significant Natural Resource values.

Response: Facility will provide accessible sidewalks connecting into and around the site for resident and community use. Wetland and buffer will be enhanced for native plant species.

e. Protect neighborhoods from excessive through traffic and travel speeds while providing reasonable access to and from residential areas. Build streets to minimize speeding.

Response: Facility will be served by 2 access points, one off of NW 185th and the other off of NW Walker road. Both access points will be right in/ right out which will provide safe access to and from the site.

f. New commercial and industrial development shall identify traffic plans for residential streets where increased cut-through traffic may occur due to the proposed development.

Response: Site access is designed in such a way as to not be conducive to “cut-through” traffic.

g. Provide convenient direct pedestrian and bicycle facilities to promote the health and physical well being of Beaverton residents, to reduce traffic congestion, to provide commuting and recreational alternatives to the motor vehicle, and to support local commerce.

Response: New right-of-way improvements will provide Washington county arterial design standards which include new bicycle lanes. In addition a new side walk will be provided along NW 185th avenue and NW Walker road, which will meet city requirements; including the addition of a 7’ landscape buffer. These improvements will act to improve pedestrian bicycle traffic around the site. Onsite sidewalks will provide safe pedestrian traffic on site, with intermittent connection to onsite bicycle parking.

h. Continually explore novel or transformative transportation designs, technologies, and integration, especially in the context of large-scale economic and redevelopment planning efforts.
Response: Not applicable to the scope of this project.

6.2.2 Goal: A balance multimodal transportation system that provides mobility and accessibility for users.

Policies:

a. Recognize that streets are important to community identity and provide a needed service. Implement Beaverton’s public street standards that recognize the multipurpose nature of the street right-of-way for a combination of utility, pedestrian, bicycle, transit, truck, auto uses, and railroad crossings.

Response: Updated rights-of-way have been provided for the Washington county and City of Beaverton’s arterial street expansion of NW 185th avenue and NW Walker rd. These expansion will incorporate the new street standards for these areas, supporting the various types of traffic including pedestrian, bicycle, transit, truck and auto uses.

b. Provide a seamless and coordinated transportation system that is barrier-free, provides affordable and equitable access to travel choices, and serves the needs of people and businesses.

Response: Updated rights-of-way have been provided for the Washington county and City of Beaverton’s arterial street expansion of NW 185th avenue and NW Walker rd. This expansion will incorporate the new street standards for these areas, supporting the various types of traffic including pedestrian, bicycle, transit, truck and auto uses, public transit at adjacent bus stop.

c. Develop and provide a safe, complete, attractive, efficient, and accessible system of pedestrian ways and bicycle ways, including bike lanes, cycle tracks, bike boulevards, shared roadways, multi-use paths, and sidewalks according to the pedestrian and bicycle system maps, and the Development Code and Engineering Design Manual requirements.

Response: New right-of-way improvements will provide Washington county arterial design standards which include new bicycle lanes. In addition, a new sidewalk will be provided along NW 185th avenue and NW Walker road, which will meet city requirements; including the addition of a 7' landscape buffer. These improvements will act to improve pedestrian bicycle traffic around the site. Onsite sidewalks will provide safe, fully accessible, pedestrian traffic on site, with intermittent connection to onsite bicycle parking.

d. Design sidewalks and the pedestrian access systems to City standards to enhance walkability: complete the accessible pedestrian network, provide safe direct access to transit and activity centers, and provide safe crossings at intersections with pedestrian friendly design.

Response: New right-of-way improvements will provide Washington county arterial design standards which include new bicycle lanes. In addition, a new sidewalk will be provided along NW 185th avenue and NW Walker road, which will meet city requirements; including the addition of a 7' landscape buffer. These improvements will act to improve pedestrian bicycle traffic around the site. Onsite sidewalks will provide safe pedestrian traffic on site, with intermittent connection to onsite bicycle parking.

e. Provide connectivity to each area of the City for convenient multimodal access. Ensure pedestrian, bicycle, transit, and vehicle access to schools, parks, commercial,
employment, and recreational areas, and destinations in station areas, regional and
Chapter Six: Transportation Element VI - 5 town centers by identifying and developing
improvements that address connectivity needs.

**Response:** New right-of-way improvements will provide Washington county
arterial design standards which include new bicycle lanes. In addition, a new side
walk will be provided along NW 185<sup>th</sup> avenue and NW Walker road, which will
meet city requirements; including the addition of a 7’ landscape buffer. These
improvements will act to improve pedestrian and bicycle traffic around the site.
Onsite sidewalks will provide safe pedestrian traffic on site, with intermittent
connection to onsite bicycle parking.

f. Develop neighborhood and local connections to provide convenient circulation into and
out of neighborhoods. Work to prevent and eliminate pedestrian and bicycle “culde-
sacs” that require substantial out-of-direction travel for pedestrians and bicyclists.

**Response:** New right-of-way improvements will provide Washington county
arterial design standards which include new bicycle lanes. In addition, a new side
walk will be provided along NW 185<sup>th</sup> avenue and NW Walker road, which will
meet city requirements; including the addition of a 7’ landscape buffer. These
improvements will act to improve pedestrian and bicycle traffic around the site.
Onsite sidewalks will provide safe pedestrian traffic on site, with intermittent
connection to onsite bicycle parking. Access to the site will be provide by right
in/right out vehicular access at two locations, further reducing the impact to
vehicular flow on the arterial streets. A ring road around the site provides
internal access around the project.

g. Identify specific areas within the City where pedestrian needs and the pedestrian
experience should be given highest priority in the design of streets, parking,
intersections, connectivity, signal controls, mapping and signing, and other
transportation facilities.

**Response:** Site has not been identified as a high pedestrian need area, not
applicable to this site.

h. The permanent closure of an existing road in a developed neighborhood is not
recommended and will be considered by the City only under the following
circumstances: as a measure of last resort, when the quality of life in the neighborhood
is being severely threatened by excessive traffic volumes or the presence of a traffic
safety hazard; or, as part of a plan reviewed through the City’s land use, site
development, and/or capital improvement process(es). Maintain existing neighborhood
connectivity by avoiding closures of existing streets except when the closure is part of
a larger plan for improvements to the neighborhood.

**Response:** Site will experience non-permanent road lane closures when right-of-
way expansion of NW 185<sup>th</sup> avenue and NW Walker road is in progress. Result
will be an improvement to the neighborhood as it will reduce vehicular
congestion and improve pedestrian and bicycle circulation.

i. Design streets to accommodate transit while minimizing impacts to traffic flow.

**Response:** TriMet bus stop will be improved along with the right-of-way
expansion project. Improvement will meet city designs and located per city
engineering.
j. Require developers to include pedestrian, bicycle, and transit-supportive improvements within proposed developments and adjacent rights-of-way in accordance with adopted policies and standards.

**Response:** New right-of-way improvements will provide Washington county arterial design standards which include new bicycle lanes. In addition, a new sidewalk will be provided along NW 185th avenue and NW Walker road, which will meet city requirements; including the addition of a 7' landscape buffer. These improvements will act to improve pedestrian and bicycle traffic around the site. Onsite sidewalks will provide safe pedestrian traffic on site, with intermittent connection to onsite bicycle parking.

### 6.2.3 Goal: A safe transportation system

**Policies:**

a. Improve traffic safety through a comprehensive program of education, enforcement, and engineering.

**Response:** New right-of-way improvements along NW 185th and NW Walker road are designed to reduce congestion and increase traffic safety.

b. Design streets to serve anticipated function and intended uses as determined by the Comprehensive Plan.

**Response:** New right-of-way improvements along NW 185th and NW Walker road are designed to reduce congestion and increase traffic safety.

c. Enhance safety by prioritizing and mitigating high crash locations within the City.

**Response:** New right-of-way improvements along NW 185th and NW Walker road are designed to reduce congestion and increase traffic safety; mitigating a high crash location.

d. Designate safe walkway and bikeway routes from residential areas to schools, parks, transit, and other activity centers.

**Response:** New right-of-way improvements will provide Washington county arterial design standards which include new bicycle lanes. In addition a new sidewalk will be provided along NW 185th avenue and NW Walker road, which will meet city requirements; including the addition of a 7' landscape buffer. These improvements will act to improve pedestrian and bicycle traffic around the site. Onsite sidewalks will provide safe pedestrian traffic on site, with intermittent connection to onsite bicycle parking. Access to the site will be provide by right in/right out vehicular access, further reducing the impact to vehicular flow on the arterial streets.

e. Construct multi-use paths only where they can be developed with satisfactory design components that address safety, security, maintainability, and acceptable uses. Multiuse paths should converge at traffic-controlled intersections to provide for safe crossing, and paths should be separate and distant from major streets for most of their length. Mid-block crossings for trails access, such as the Denney Road Fanno Creek Trail crossing, will be considered as appropriate where findings for safety are met and such crossings are approved by the City.

**Response:** No multi-use paths are identified as part of the scope of this project, not applicable.

f. Provide satisfactory levels of maintenance to the transportation system in order to preserve user safety, facility aesthetics, and the integrity of the system as a whole.
g. Maintain access management standards for streets consistent with City, County, and State requirements to reduce conflicts among vehicles, trucks, rail, bicycles, and pedestrians. Preserve the functional integrity of the road system by limiting access per City standards.

Response: Beaverton Senior Living community has been working with Washington county and the City of Beaverton to locate safe access points off of NW 185th avenue and NW Walker road. These access points are right in/right out to maintain the integrity of the current traffic flows.

h. Ensure that adequate access for emergency services vehicles is provided throughout the City.

Response: Development will provide adequate access for emergency services vehicle to and around the site. Tualatin Valley Fire and Rescue has reviewed proposed site plan, and approved site access and circulation.

i. Meet federal and State safety compliance standards for operation, construction, and maintenance of the rail system.

Response: No rail system is located on or near the site, policy is not applicable.

j. Provide safe routing of hazardous materials consistent with federal guidelines, and provide for public involvement in the process.

Response: Proposed facility will function to house senior residents, no hazardous materials in the facility.

6.2.4 Goal: An efficient transportation system that reduces the percentage of trips by single occupant vehicles, reduces the number and length of trips, limits congestion, and improves air quality.

Policies:

a. Develop an energy efficient transportation system.

Response: Facility will provide a shuttle bus for residence to reduce vehicular trips generated on site. Location to adjacent bus stops provide residents and staff with access to additional efficient transportation options.

b. Support and implement trip reduction strategies developed regionally, including employment, tourist, and recreational trip reduction programs.

Response: Facility will provide a shuttle bus for residence to reduce vehicular trips generated on site. Location to adjacent bus stops provide residents and staff with access to additional efficient transportation options.

c. Limit the provision of parking to meet regional and State standards.

Response: Proposed project is requesting a parking variance to reduce the number of parking stalls to an appropriate count as the senior use creates a lower trip generation. This meets the goal of limiting parking.

d. Manage parking in the Regional Center Old Town area.

Response: Proposed project is not located in the Regional Center Old Town area, not applicable to scope of project.

e. Maintain mobility and performance standards that meet the needs of the City and are consistent with regional and State standards.

Response: Proposed project will meet current city, state and county codes.

f. Reduce traffic congestion and enhance traffic flow through such system management measures as intersection improvements, intelligent transportation systems, incident
management, signal priority, optimization, and synchronization, and other similar measures.

Response: New right-of-way improvements along NW 185th and NW Walker road will are designed to reduce congestion and increase traffic safety.

g. Plan land uses to increase opportunities for multi-purpose trips (trip chaining).

Response: Proposed development will encourage multipurpose trips to meet facility functions and resident needs by providing the senior age residents access to an onsite bus for day to day errands.

h. Require land use approval of proposals for new or improved transportation facilities. The approval process shall consider the project's identified impacts.

Response: Proposed project does not include transportation facilities within the scope, not applicable.

i. Support mixed-use development in appropriate locations and encourage local job creation in order to reduce the number of locally generated regional commuting and shopping trips.

Response: Proposed site is zoned residential with licensed senior living facilities allowed as a conditional use. Goal does not apply to city zoning for the site.

j. Coordinate with TriMet and other agencies to implement transit improvements concurrent with roadway improvements, to improve access and frequency of service, to provide parking as appropriate at transit centers, and to increase ridership and service area. Encourage development of regional high capacity transit, including light rail transit, streetcar, and commuter rail.

Response: Updated right-of-ways have been provided for the Washington county and City of Beaverton's arterial street expansion of NW 185th avenue and NW Walker rd. These expansion will incorporate the new street standards for these areas, and require that existing TriMet bus stops have been updated to meet current city and Washington county standards.

6.2.5 Goal: Transportation facilities that serve and are accessible to all members of the community

Policies:

a. Construct transportation facilities, including access to and within transit waiting areas, to meet the requirements of the Americans with Disabilities Act.

Response: Proposed project is not a transportation facility, goal is not applicable to scope of project.

b. Support TriMet, other transit service providers, and employers’ and social service agencies’ efforts that respond to the transit and transportation needs of elderly, economically disadvantaged, and disabled persons.

Response: Proposed project is not a transportation facility, goal is not applicable to scope of project.

c. The totality of all projects and programs should benefit all populations equally.

Response: Proposed project is not a transportation facility, goal is not applicable to scope of project.

6.2.6 Goal: Transportation facilities that provide safe efficient movement of goods

Policies:

a. Designated arterial routes and freeway access are essential for efficient movement of goods. Design these facilities and adjacent land uses to reflect these needs.
   **Response:** Beaverton Senior Living community has been working with Washington county and the city of Beaverton to locate safe access points off of NW 185th avenue and NW Walker road.

b. Reflect the needs of rail and air transportation facilities and regional mobility corridors in land use decisions.
   **Response:** Proposed project is not a transportation facility, goal is not applicable to scope of project.

c. Maintain traffic flow and mobility on arterial and collector roadways. Examples that may be pursued include Transportation System Management (TSM) strategies such as access spacing, intelligent transportation systems (ITS), and signal systems or operational enhancements such as adaptive signal systems.
   **Response:** New right-of-way improvements along NW 185th and NW Walker road will be designed to reduce congestion and increase traffic safety.

d. Ensure a safe and efficient freight system that facilitates the movement of goods to, from, and through Beaverton, the region, and the state while minimizing conflicts with other travel modes.
   **Response:** Proposed project is not a transportation facility, goal is not applicable to scope of project.

6.2.7 **Goal:** Implement the transportation plan by working cooperatively with federal, State, regional, and local governments, the private sector, and residents.

**Policies:**

a. Coordinate transportation projects, policy issues, and development actions with all affected governmental units in the area. Key agencies for coordination include Washington County, Oregon Department of Transportation, TriMet, Metro, Tualatin Hills Park and Recreation District, Tualatin Valley Fire and Rescue, and the adjacent cities of Tigard, Hillsboro, and Portland.
   **Response:** Policy is directed at government function, not applicable to the scope of the project.

b. Participate in regional transportation, growth management, and air quality improvement programs. Work with agencies to assure adequate funding of transportation facilities to support these programs.
   **Response:** Policy is directed at government function, not applicable to the scope of the project.

c. Monitor and update the Transportation Element of the Comprehensive Plan so that issues and opportunities are addressed in a timely manner.
   **Response:** Policy is directed at government function, not applicable to the scope of the project.

d. Maintain a current capital improvement program that establishes the City’s construction and improvement priorities, and allocates the appropriate level of funding.
   **Response:** Policy is directed at government function, not applicable to the scope of the project.

e. Establish rights-of-way through development review and, where appropriate, officially secure them by dedication or reservation of property.
   **Response:** Policy is directed at government function, not applicable to the scope of the project.

6.2.8 **Goal:** Create a stable, flexible financial system

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Policies:

a. Plan for an economically viable and cost-effective transportation system.  
Response: Policy is directed at government function, not applicable to the scope of the project.

b. Identify and develop diverse and stable funding sources to implement recommended projects in a timely fashion.  
Response: Policy is directed at government function, not applicable to the scope of the project.

c. Use the System Development Charge, Traffic Impact Fees, and development exactions as elements of an overall program to pay for adding capacity to the transportation system and for making safety improvements related to development impacts.  
Response: Policy is directed at government function, not applicable to the scope of the project.

d. Develop a long-range financial strategy to make needed improvements to the transportation system and to support operational and maintenance requirements by working in partnership with Metro, Oregon Department of Transportation, Washington County, and other jurisdictions and agencies.  
Response: Policy is directed at government function, not applicable to the scope of the project.

e. Provide adequate funding for maintenance of the capital investment in transportation facilities.  
Response: Policy is directed at government function, not applicable to the scope of the project.

f. Track and report transportation funding receipts and expenditures for the purposes of keeping Beaverton residents and businesses informed about funding the big picture.  
Response: Policy is directed at government function, not applicable to the scope of the project.

7.1.1 Goal: Balance development rights with natural resource protection.

Policies:

a) Coordinate resource protection programs with affected local, state, and federal regulatory agencies, and notify them of development proposals within natural resource areas.

Action 1: Adopt land use processes to incorporate notification to appropriate agencies as part of the development review process.

Action 2: Continue membership and activity within the Tualatin Basin Natural Resources Coordinating Committee.

Action 3: Encourage the use of the habitat friendly development practices of low impact development techniques through the Pre-Application Conference.

Action 4: Proactively lead the way with development of city buildings by using habitat friendly development practices and low impact development techniques.

Action 5: Develop a comprehensive habitat benefit area plan for the Beaverton Downtown Regional Center to integrate Beaverton Creek into the Regional Center as an amenity.

Response: Onsite wetlands will be improved and maintained per clean water services standards.  ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.
b) Where adverse impacts to Significant Natural Resources cannot be practicably avoided, require mitigation of the same resource type commensurate with the impact, at a location as close as possible to the impacted resource site.

**Response:** Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fees to be provided to a mitigation bank.

c) Allow for relaxation of development standards to protect significant natural and historic resources. Such standards may include but are not limited to minimum setbacks, maximum building height, minimum street width, location of bicycle, pedestrian and multi-use paths, etc.

**Action 1:** Adopt and apply land use regulations that allow and encourage habitat friendly and low impact development practices within habitat benefit areas, and where appropriate, throughout the city.

**Action 2:** Adopt and apply a system to allow flexibility in applying the site development standards when development employs low impact development techniques and habitat friendly development practices.

**Action 3:** Adopt and apply an incentive program to encourage the use of the low impact development techniques and habitat friendly development practices.

**Response:** Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fees to be provided to a mitigation bank.

d) City policies or regulations shall not interfere with actions necessary for nuisance abatement or protecting the safety, health and welfare of Beaverton's citizens.

**Response:** Not Applicable.

e) Upon annexation of unincorporated properties with County Goal 5 natural resource designations, the City shall rely on the Urban Planning Area Agreement with Washington County to determine the appropriate City designation.

**Action 1:** The City shall work with Washington County to periodically update the UPAA to ensure compatibility in Goal 5 resource inventories, significance determination, and program decisions.

**Response:** Not applicable to the scope of this project.

7.3.1.1 Goal: Conserve, protect, enhance or restore the functions and values of inventoried Significant Natural Resources.

**Policies:**

a) Inventoried natural resources shall be conserved, protected, enhanced or restored:

- to retain the visual and scenic diversity of our community;
- for their educational and recreational values;
- to provide habitats for fish and wildlife in our urban area.
Response: Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

b) Conserve, protect and enhance natural resource sites and values though a combination of programs that involve development regulations, purchase of land and conservation easements, educational efforts, and mitigation of impacts on resource sites.

   Action 1: Establish acquisition programs for Significant Goal 5 Resources; prepare and maintain a long-range list of priority resource locations for public acquisition.

   Action 2: Facilitate and encourage habitat friendly development practices and low impact development through flexibility in site development standards and reduction in surface water management fees and systems development charges.

Response: Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

c) Inventoried natural resources shall be incorporated into the landscape design of development projects as part of a site development plan, recognizing them as amenities for residents and employees alike.

Response: Onsite wetlands will be improved and maintained per clean water services standards. Per clean water services access to this area will be restricted. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

d) The City shall rely on its site development permitting process as the mechanism to balance the needs of development with natural resource protection.

Response: Facility will meet all required reviews and approvals of the city of Beaverton.

e) Development within Significant Natural Resource areas shall be consistent with the relevant regulations or guidelines of the National Marine Fisheries Service, U.S. Fish and Wildlife Service, Oregon Department of Fish and Wildlife, U.S. Army Corps of Engineers, Oregon Division

Response: Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

f) Specific uses of or development activities in Significant Natural Resources areas shall be evaluated carefully and those uses or activities that are complementary and compatible with resource protection shall be permitted. This is not intended to prohibit a land use permitted by the underlying zoning district but only to regulate the design of development such as building or parking location or type of landscaping.

Response: Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected...
area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

g) Limited alteration or improvement of Significant Natural Resource areas may be permitted so long as potential losses are mitigated and "best management practices" are employed.

Response: Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

h) Roads and utilities, which must be located within, or traverse through, a Significant Natural Resource Area, shall be carefully planned and aligned so as to minimize loss and disruption. A rehabilitation or restoration plan shall be a necessary component. The City should allow variations from standard street sections in these areas.

Response: Not applicable to the scope of this project.

7.3.2.1 Goal: Promote a healthy environment and natural landscape in riparian corridors, and manage conflicting uses through education, and adoption and enforcement of regulations.

Policies:
a) Significant Riparian Corridors shall be protected for their fish and wildlife habitat values, and other values associated with the natural resource area. Development plans for these areas shall treat these components as assets and encroachment into the riparian corridor shall require enhancement, mitigation, or restoration.

Response: Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

b) Streams, creeks, and other watercourses, including a number of small drainages not identified on the Significant Natural Resources inventory maps, can be significant amenities. The City should protect the natural resource values of these areas from damage or degradation caused intentionally or by neglect. The city should cooperate with and assist property owners in maintaining and upgrading these areas for their potential aesthetic, wildlife, or recreational value.

Response: Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

7.3.3.1 Goal: Protect or enhance wetlands adopted as Significant Wetlands in the Local Wetland Inventory.

Policies:
a) Significant Wetlands in the Local Wetland Inventory shall be protected for their filtration, flood control, wildlife habitat, natural vegetation and other water resource values.

Response: Onsite wetlands will be improved and maintained per clean water services standards. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.
area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

b) Development within the buffer area adjacent to a significant wetland shall be subject to restrictions on building, grading, excavation, placement of fill, and native vegetation removal.

**Response:** Buffer area of wetlands will be improved upon and maintained by clean water services.

c) Where development is constrained due to wetland protection regulations, a hardship variance may be granted if approval criteria are met.

**Response:** Facility is utilizing major modifications for height and parking to accommodate constraints caused by the onsite wetland and 50' wetland buffer.

### 7.3.4 Wildlife Habitat

OAR 660-23-110 contains procedures and requirements for complying with Statewide Planning Goal 5 as it pertains to protection of wildlife habitat. The rule specifies that a local government must obtain any current habitat inventory information from the Oregon Department of Fish and Wildlife (ODFW) and other state and federal agencies. Under “safe harbor” criteria, OAR 660-23-110(4) says local governments may determine that “wildlife” does not include fish, and that significant wildlife habitat is only those sites where one or more of the following conditions exist:

(a) The habitat has been documented to perform a life support function for a wildlife species listed by the federal government as a threatened or endangered species, or by the state of Oregon as a threatened, endangered or sensitive species;

**Response:** Not applicable to the scope of this project.

(b) The habitat has documented occurrences of more than incidental use by a species described under (a) above;

**Response:** Not applicable to the scope of this project.

(c) The habitat has been documented as a sensitive bird nesting, roosting, or watering resource site for osprey or great blue herons;

**Response:** Not applicable to the scope of this project.

(d) The habitat has been documented to be essential to achieving policies or population objectives specified in a wildlife species management plan adopted by the Oregon Fish and Wildlife Commission; or

**Response:** Not applicable to the scope of this project.

(e) The area is identified and mapped by ODFW as habitat for a wildlife species of concern and/or as a habitat of concern.

**Response:** Not applicable to the scope of this project.

### 7.3.4.1 Goal: Protect wildlife habitat in the city in association with protecting significant natural resources.

Policies:
a) Limit impacts from development or human intrusion on sites likely to contain wildlife habitat through use of regulations adopted for protection of other natural resources, or by adopting new regulations if necessary.

Response: Onsite wetlands will be improved and maintained per clean water services standards, this provides potential habitat for wildlife. ½ acre will be mitigated for site development, the affected area has been reviewed by clean water services and the army corps of engineers, fee's to be provided to a mitigation bank.

7.4.1 Goal: Conserve Significant Scenic Views and Sites, and the value they add to community.

Policies:

a) Help to preserve and enhance the City’s character, beauty and livability through the identification and protection of significant scenic sites in the city and views of those sites.

Response: Not applicable to the scope of this project.

b) Significant Scenic Sites may include forested areas or a specimen tree and are determined to have two or more of the following characteristics:

- aesthetic value,
- uniqueness of tree size, shape, rarity of specie,
- proximity of forested area to wetlands or riparian areas,
- provides slope stability,
- absorption of rainfall (canopy effects to offset adjoining impervious surfaces ), and
  - absorbs stormwater runoff.

All significant scenic sites must be visible from an existing or planned viewpoint that is safe and accessible to the general public.

Response: Not applicable to the scope of this project.

7.5.2 Goal: Increased use of solar energy and other renewable energy resources in new development in the City.

Policies:

a) Assist in the conservation of energy by promoting more efficient transportation modes and land use patterns.

Response: Site is located adjacent to 2 bus stops, providing sustainable and efficient transportation to residents and staff.

b) Encourage higher density development where appropriate.

Response: Facility meets the residential min/max density requirements for the site, as defined by the R2 zoning. In addition to this the facility also provided a mix of assisted living and memory care units that increases the provided overall resident density of the site.
c) Continue to update applicable codes and regulations to promote energy conservation.

   **Response:** Facility will meet or exceed state and federal codes.

d) Support educational programs on energy conservation and use of renewable energy resources through cooperation with other agencies and energy suppliers.

   **Response:** Not applicable to the scope of this project.

e) Support energy programs that inform senior citizens and low income groups of available local, state, and federal winterization, and energy efficient programs.

   **Response:** Not applicable to the scope of this project.

f) Support state and federal legislation that encourages energy saving design and building practices.

   **Response:** Facility will meet or exceed the Oregon energy code.

g) The City should set an energy efficient example by using best management conservation practices in all of their facilities. Alternatives should be economically beneficial.

   **Response:** Facility will meet or exceed the Oregon energy code, which meets city requirements.

h) The City shall retain and apply regulations requiring consideration of solar energy options in the development process.

   **Response:** No solar options are provided in this facility; policy is not utilized.

8.2.1. **Goal:** Maintain and improve water quality, and protect the beneficial uses, functions and values of water resources.

a) All water resource areas within the City shall be enhanced, restored or protected to the extent practicable.

   **Response:** A small stream, located in the wetland, on the east property line will be maintained and improved by clean water services.

b) The City shall limit development in vegetative corridors along streams through application of the CWS Design and Construction Standards so as to substantially comply with requirements of the Metro Functional Plan Title 3.

   **Response:** A small stream, located in the wetland, on the east property line will be maintained and improved by clean water services.

c) The City shall support the development of education programs aimed at helping citizens understand the importance of good stewardship and the use of non-regulatory tools that will provide additional water quality resource protection.

   **Response:** Not applicable to the scope of this project.

d) Partner with other local jurisdictions and service providers to avoid duplication of efforts and resources.

   **Response:** Not applicable to the scope of this project.

e) Protect investments in the City by managing storm water runoff.
Response: A large portion of the site storm water runoff will be handled on site and used to improve the wetland area.

f) Encourage development in urban environments in ways that promote healthy environments and natural resources.

Response: A small stream, located in the wetland, on the east property line will be maintained and improved by clean water services. The facility and its surrounding parking will maintain a 50’ buffer from the wetland area.

8.3.1. Goal: Maintain and improve Beaverton’s air quality to increase livability and quality of life.

Policies:

a) Support efforts to reduce air pollutant emissions in the City and within the AQMA.

Response: Facility will utilize low VOC and natural materials within the building. Residents and staff will be encouraged to utilize nearby public transportation, reducing green house gas emissions.

b) Comply with the EPA, DEQ, and Metro approved plans to achieve federal, state, and regional air quality standards through the adopted regional control strategies.

Response: Not applicable to the scope of this project.

c) Consider and work to mitigate air quality impacts in the development review process.

Response: A reduction in parking is being sought after through a major modification to the design review III and conditional use permits. This will result in a decrease in greenhouse gas emission and better air quality. Maintaining the adjacent wetland will have an additional positive affect on the air quality on site.

7.6.1 Goal: Protect groundwater in the City from contamination.

Policies:

a) Cooperate with other local water providers and neighboring jurisdictions in preventing pollution in areas around municipal and domestic wells so as to protect groundwater that is a source of potable water for the City from contamination.

Response: A small stream, located in the wetland, on the east property line will be maintained and improved by clean water services. The facility and its surrounding parking will maintain a 50’ buffer from the wetland area.

8.4.1. Goal: Create and protect a healthy acoustical environment within the City.

Policies:

a) Noise impacts shall be considered during development review processes.

Action 1: Adopt and implement appropriate design standards for development permits for all commercial, industrial, high density, mixed use and transportation projects, and others as appropriate. Development applications should be required to demonstrate compliance with
applicable noise level standards. Means of meeting the design standards might include, but are not limited to:

- Use of year-round landscape elements that absorb parking lot and street noise.
- Use of underground parking.
- Use of extra-thick windows.
- Facades constructed of materials that help to absorb sounds.
- Pervious surface landscape and parking lot materials that absorb sounds.
- Use of building materials that aid in the reduction of sound traveling through common floors and walls.
- Dampers on heating and cooling equipment.

**Response:** Landscaping through the use of year-round trees and shrubs will be provided in and around the site to help reduce the noise generated on site. The facility has been pulled away from the property lines to create an additional buffer from adjacent properties. Facades have been articulated to reduce sound transmission.

b) The City shall comply with EPA and DEQ noise standards.

**Response:** Facility will comply with EPA and DEQ noise standards.

### 8.5.1 Goal: Protect life and property from potential earthquake hazards.

**Policies**

a) Limit as much as possible the potential loss of life and property resulting from earthquake

**Response:** Building to be designed by a structural engineer to meet local and state codes, including but not limited to seismic considerations.

b) Ensure that key public, semi-public and private buildings retain structural integrity and remain functional in the event of an earthquake.

**Response:** Building to be designed by a structural engineer to meet local and state codes, including but not limited to seismic considerations.

### 8.6.1 Goal: Protect life and property from geological hazards associated with identified unstable steep slopes, erosion and deposition, and weak foundation soils.

a) Limit or prohibit development in geologically hazardous areas that pose a threat to life and property.

**Response:** Site is primarily flat, with most sloping occurring in the wetland area. Building site is a minimal risk area.

b) The City shall support the reclamation of aggregate sites having a Department of Geology and Mining Industry (DOGAMI) mining permit, to ensure the stability of slopes and prevention of erosion, and to prevent the creation of weak foundation soils.

**Response:** Not applicable to the scope of this project.
8.7.1 Goal: Maintain the functions and values of floodplains, to allow for the storage and conveyance of stream flows and to minimize the loss of life and property.

Policies:

a) Utilize uniform or complementary interjurisdictional floodplain development and management programs to reduce flood hazards, protect natural resources, and permit reasonable development.

Response: Not applicable to the scope of this project.

b) Development shall be prohibited in the floodway, except as necessary for the placement of roadways, utilities, storm water conveyance, bridges, culverts, and grading related to public utility projects as permitted by the appropriate implementing ordinances.

Response: Not applicable to the scope of this project.

c) Construction within the flood range shall be regulated through the City’s implementing ordinances, such as the City’s Engineering Design Manual and Standard Drawings.

Response: Not applicable to the scope of this project.

d) Uncontained areas of hazardous materials, as defined by the DEQ, shall be prohibited in the floodplain.

Response: Not applicable to the scope of this project.

Goal 9.1.1 Maximize efficient use of the city’s employment land

Policies:

a) Create programs and prioritize capital improvements that encourage redevelopment and intensification of developed properties

Response: Not applicable to the scope of this project.

b) Expand the city’s brownfields program and develop new programs and incentives that aid property owners in developing currently underutilized sites

Response: Not applicable to the scope of this project.

c) Support boundary changes that consider the city’s unique geopolitical boundaries and the availability of city and other urban services to help meet the city’s identified employment needs

Response: Not applicable to the scope of this project.

d) Identify and protect the city’s employment areas by adopting regulations that promote an appropriate mix of uses in industrial and other employment zones.

Response: Not applicable to the scope of this project.

e) Attract industries with higher employment densities, especially in areas along transit lines and near restaurants, services, and other urban amenities

Response: Facility will staff 100-120 individuals and is located adjacent to 2 bus routes, complies with policy.

f) Develop strategies to maximize employment within targeted planning areas, including the city’s major employment areas, commercial corridors, and neighborhood business districts

Develop and
market an inventory of vacant and available commercial properties throughout the city and the incentives available for improving and adding jobs to these properties

Response: Facility will staff 100-120 individuals and is located adjacent to 2 bus routes, complies with policy.

h) Encourage home-based businesses that have minimal impacts on neighborhoods

Response: Not applicable to the scope of this project.

i) Maintain the city's supply of flex space, which provides flexibility for changing economic conditions and trends

Response: Not applicable to the scope of this project.

j) Support strategic interim uses that precede larger scale development and contribute to the urban character of the city

Response: Not applicable to the scope of this project.

k) Develop tools that can aid in consolidating small parcels and allow for larger scale redevelopment or facilitate development consistent with the city's economic development strategies

Response: Site will consolidate 3 lots into 1 larger lot, resulting in a larger facility being developed.

l) Support strategies to advance local and regional transportation projects that best combine the most effective greenhouse emissions reduction strategies

Response: Facility is located adjacent to 2 transit stops, allowing residents and staff to commute in a more efficient and sustainable manner.

m) Encourage job creation by identifying employment areas appropriate for development of job generating uses at higher densities and implementing strategies that increase employment density or output per acre

Response: The Beaverton Senior Living facility will host a mix of uses to support the independent living, assisted living, and memory care occupants. It is anticipated that the facility will employ 100-120 staff members, and provide a mix of services including but not limited to dining, salon, fitness, multipurpose gathering areas, etc...

Goal 9.4.1: Position Downtown Beaverton and Surrounding Areas as a Major Employment Center and an Attractive Urban Lifestyle Center

Policies:

a) Encourage increased housing density in downtown Beaverton and surrounding areas to expand the customer base of existing and future businesses and provide housing opportunities to local employees

Response: Site is zoned as an R2 Residential Urban Medium Density District. Beaverton Senior Living Facility will meet the Min/Max residential density required for a site this size. Maximum density allowed is 120 units, facility will provide 100 independent living units meeting the residential density
requirements. The assisted living and memory care units are being reviewed as a conditional use and are not included in the residential density calculations.

b) Market the city’s proximity to transit, its expanding pedestrian and bicycle network, and other urban amenities

**Response:** Facility will utilize the adjacent transit options for residents and staff, connect to bicycle network being upgraded by Washington county, and connect to street adjacent pedestrian sidewalks.

c) Continue to support special events such as Beaverton Third Thursday, First Friday and Night Market that bring more people to the city’s central core

**Response:** Not applicable to the scope of this project.

d) Encourage the development of parking structures and shared parking agreements to reduce the city’s number of surface parking lots and open up additional land for redevelopment

**Response:** Not applicable to the scope of this project.

e) Assist property owners and developers with land assembly to encourage more development downtown

**Response:** Not applicable to the scope of this project.

f) Make targeted improvements to public infrastructure and facilities to improve site readiness and competitiveness and stimulate private investment

**Response:** Not applicable to the scope of this project.

g) Incent new restaurants and other amenities that are attractive to employees and residents seeking a more urban environment and which can contribute to an 18-hour neighborhood in the downtown area

**Response:** Not applicable to the scope of this project.

h) Market development of the Westgate Property and city-owned lots at the Round as catalytic sites that will stimulate further development

**Response:** Not applicable to the scope of this project.

i) Expand the boundaries of the city’s Main Street Program to include nearby commercial corridors

**Response:** Not applicable to the scope of this project.

**Chapter 10:**

**Goals:** Increase access to healthy, fresh, affordable food, especially in underserved neighborhoods.

**Policies:**

1. Support affordable and sustainable local food systems, food hubs and fresh food retailers to increase access to healthy food throughout the city.

**Response:** Not applicable to the scope of this project.

2. Reduce barriers to siting and support of community gardens on private property, vacant public property, and unused rights-of-ways and increase access to fresh, local agricultural products.

**Response:** Not applicable to the scope of this project.
**Goals:** Increase access to safe and convenient opportunities for recreation and physical activity throughout the community.

**Policies:**

1. Provide a comprehensive and integrated system of parks, plazas, playgrounds, trails and open space to promote health and social connectedness through physical activity.
   
   **Response:** Not applicable to the scope of this project.

2. Enhance accessibility and safety to key destinations such as schools, libraries and retail centers for pedestrians, bicyclists and public transit riders.
   
   **Response:** Not applicable to the scope of this project.

3. Promote mixed-use urban streets that balance public transit, walking and bicycling with other modes of travel.
   
   **Response:** Not applicable to the scope of this project.

**Goals:** Improve the quality of the built and natural environments.

**Policies:**

1. Coordinate the development of complete neighborhoods that include neighborhood amenities, such as access to food, multiple modes of transportation (e.g. sidewalks, bike facilities, transit, safe routes to schools, automobile safety), medical care, and schools, for the health, safety, and welfare of all residents.
   
   **Response:** Not applicable to the scope of this project.

2. Encourage universal design in publicly funded new construction, renovation and community planning efforts.
   
   **Response:** Not applicable to the scope of this project.

3. Work with the appropriate local, state, and federal agencies to promote the clean-up and reuse of abandoned or underused sites, such as brownfields, to protect human and environmental health.
   
   **Response:** Not applicable to the scope of this project.

4. Consider creating incentives for improving indoor air quality (e.g. eliminating water leaks, removing mold, and improving ventilation) to property owners providing housing within Medically Underserved Census Tracts.
   
   **Response:** Not applicable to the scope of this project.

5. Partner with the Home Builders’ Association to research demographic changes with regard to disabilities and seniors to encourage members to build new residential units with universal design.
   
   **Response:** Not applicable to the scope of this project.

6. Develop a tracking system of specific complaints and violations of the City’s property maintenance code and other housing condition complaints and violations.
   
   **Response:** Not applicable to the scope of this project.

**Goals:** Improve access to health care for all.

**Policies:**

1. Promote location of medical facilities within Medically Underserved Population Census Tracts.
   
   **Response:** Not applicable to the scope of this project.
Goals: Increase coordination of public and private agencies to promote long-term health and maximize independence among vulnerable populations.

Policies:

1. Encourage coordinated service delivery for food, housing, health care, and other basic necessities of life.
   Response: Not applicable to the scope of this project.

2. Promote access to information and referral to food, housing, healthcare and other resources throughout City departments and in coordination with other public agencies.
   Response: Not applicable to the scope of this project.

3. Encourage public and private efforts that support food pantries and other supplemental nutrition programs, especially to meet the nutritional needs of infants, children and the elderly.
   Response: Not applicable to the scope of this project.

4. Distribute social service funding equitably among organizations providing services to the Beaverton community according to demonstrated areas of need.
   Response: Not applicable to the scope of this project.

Response:

Sincerely,
Ankrom Moisan Architects, Inc.

Gunnar Langhus
Senior Project Manager